

**Comments on  
draft Thimblertown Development Brief Non Statutory Guidance  
Received June 14<sup>th</sup> – July 26<sup>th</sup> 2021**

Summarised comments	Received from	PKC Officer response	Change to be made to Guidance
General Comments (on the principle of development)			
Perth is visually connected to the wider, countryside. More development encloses the town centre.	A member of the public	The principle of development on this site has been established by the <a href="#">Local Development Plan 2</a> (LDP). This location has easy access to city centre facilities and excellent public transport links. The mobility corridors will provide views through the site and there is requirement for a Landscape and Visual impact assessment to support detailed proposals at the planning application stage.	None
Former tenant with outlook over Thimblerow who is happy to see progress.	A member of the public	Noted.	None
General Comments (on the land uses proposed)			
Comments query the primary use being housing, and seek certainty on what will be delivered. There is concern about health of the city centre and its current offering. It is considered that more needs to be done to offer things for young people and families to do. Something new or innovative, and new amenities are sought to attract people into the centre. Leisure facilities	6 members of public	A greater element of commercial uses than currently proposed was Perth and Kinross Council's (PKC's) original intention, but the market did not support the progress of a major commercial development with substantial leisure, office, food and drink, and retail provision.	None

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<p>were mentioned including indoor play area, bowling alley, indoor crazy golf, and indoor climbing. There was also support for the original plan which included a cinema, retail, and the option of new restaurants.</p>		<p>At its meeting of 30 July 2020 (Report No. 20/129) PKC agreed not to grant an extension to York-based Espresso Property to extend the Development Agreement, which was due to expire on 2 August 2020. The Council considered that following the economic impact of the Covid 19 pandemic and its impact on the leisure/retail/office sector in Perth City centre, such an extension was no longer beneficial, and a principally residential development was more desirable. The Council then decided at its meeting of the 16th December 2020 (Report 20/258) that principally residential uses are appropriate if we ensure the commercial connection to the High St and it was requested that the Head of Planning &amp; Development prepare a non-statutory planning brief for this largely council owned site.</p> <p>It is likely that Perth will have a larger retail footprint than the current and projected population can support, and some diversification will be required. We need to support existing amenities. The brief's vision of sustainable urban living is more valid post-Covid as town and city centres urgently need to adapt to being principally places in which to live and socialise.</p>	

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		<p>The Council has a key opportunity here to accelerate its ambition for Perth as a dynamic, sustainable place in which to live life well. Nevertheless, the brief requires the linkages between the retail park and the city centre to be enhanced, and provision of some active commercial and community uses along this.</p> <p>The brief provides guidance on LDP2 planning criteria and interests. At planning application stage the possibilities for development in and around this site will be further informed by environmental review and constraints. The exact scale and mix of the development elements will be arrived at later through the submission of a detailed planning application with associated background supporting information.</p>	
<p>Considers this site should in part be given over to a transport hub with local bus (mostly Mill Street) and country /inter-city bus (mostly Bus Station) to remove most services from the inner city centre. Considers more people to interchange between intercity coaches and local buses than intercity coaches and trains. Most connections are between buses rather than rail to bus. Thimblerow is ideally situated on the ring road</p>	<p>A member of the public</p>	<p>The Council decided at its meeting of the 16<sup>th</sup> December 2020 that the Head of Planning &amp; Development should prepare a non-statutory planning brief for this largely council owned site. The Council (Report 20/258) considered that principally residential uses are appropriate, particularly in a post Covid context. The brief's vision of sustainable urban living is more valid post-Covid as town and city centres urgently</p>	<p>None</p>

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<p>for ease of access of long distance. This would allow major redesign of Mill Street as civic square and free up land at Leonard Street bus station.</p>		<p>need to adapt to being principally places in which to live and socialise. The Council has a key opportunity here to accelerate its ambition for Perth as a dynamic, sustainable place in which to live life well.</p> <p>LDP2 does not identify the site for a bus station as there are no plans to progress a proposal of this nature. Instead Perth and Kinross Council in conjunction with Network Rail and ScotRail have been progressing long-term plans for a major revision to Perth's main rail and bus stations. As well as a review of the railway infrastructure around Perth Station, there is opportunity to offer significant improvements as well as integration with the bus station located nearby. The potential co-location of the bus and rail station would be to the advantage of Perth and the travelling public. The project would provide an integrated transport interchange, better parking, offer an improved passenger experience and a much enhanced visitor arrival in Perth City centre. This would allow the existing bus station to be redeveloped for alternative uses as identified in the LDP2 (see OP9 Bus Station).</p>	

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<p>Public Transport Unit comments that no buses have used Old High Street since the refurbishment works started at St Paul's Church. Now these works are finished there appear to be no plans to reinstate buses down this street. However, PTU consider should the current brief be rejected then we would be happy to discuss other options for creating access for buses/coaches to the Old High Street car park area. In the past there has been discussion around developing a new bus station at this location and this site would be worth considering.</p>	<p>Public Transport Unit, PKC</p>	<p>Note that no buses are using the Old High St and there are no plans to reinstate buses down this street.</p> <p>PKC is currently progressing plans for a major revision to Perth's main rail and bus stations, and has made a decision to progress a principally residential development at Thimblerow. Please see response to Eddie Murie above which provides further explanation.</p>	<p>None</p>
<p>Considers this an appropriate location for a bus station, and proposes ideas for how this could be designed and managed.</p>	<p>A member of the public</p>	<p>PKC is currently progressing plans for a major revision to Perth's main rail and bus stations, and has made a decision to progress a principally residential development at Thimblerow. Please see response to Eddie Murie above which provides further explanation.</p>	<p>None</p>
<p>General comments (structure/design of the document)</p>			
<p>Comments on improving and demonstrating the Council's vision and rooting the project in its</p>	<p>Architecture and</p>	<p>Agree that adding further illustrations will help better communicate the aspirations of the brief.</p>	<p>Amendments to improve the visual content. A city centre analysis map has been added</p>

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<p>wider context. Suggests addition of aspirational images, and good practice examples that are referenced in section 8 up front and interweaving throughout the document - examples of the type of place you are envisaging.</p> <p>Also comments on development of the wider context / analysis to include an understanding of how the site ties into wider links with local services, and wider transport routes.</p>	<p>Design Scotland</p>	<p>Also a City Centre analysis map and additional text to highlight the wider context of the site will better communicate analysis of the wider context particularly in terms of transport facilities and projects and the connection between the city centre retail core and St Catherine's.</p>	<p>on p6 (showing transport links/projects, key retail areas and links between them, the city car parking provision, and the Lower City Mills visitor heritage proposals), with the site existing analysis map p7 amended to focus on site context (so removing the Inner City Ring Road which is now on the City Centre analysis map).</p> <p>To p8 add the following to the Context and Analysis to pick up on themes picked up in the City centre analysis mapping, ‘<b>City Centre car park provision</b> is generous within the city centre and also within the West central city centre. There is scope to reduce car parking provision within Thimble Row if proposed alongside modal shift measures.’</p> <p>‘<b>Dunkeld Road Corridor (DRC)</b> has secured funding and is the first part of the Perth Cycle Network Masterplan. The masterplan outlines a framework for investment, identifying cycle corridors to better link the city centre to its surrounding communities. The DRC will enhance this connection for the communities of Balhousie, Muirton, North Muirton, Tulloch, and Bertha Park. There is a</p>

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			<p>need to tie this proposal into the DRC to encourage modal shift.'</p> <p><b>'Proximity to Mill St bus stances</b> taken alongside the DRC linkage, and Thimblerow's position on edge of the inner city ring road highlight the opportunity for a mobility hub.'</p> <p>Also there is a proposed amendment and acknowledgment (p9) that the sensitive design sought for heritage purposes also helps support proposals for Lower City Mills as a visitor and heritage attraction. Amending to add the sentence in bold. 'The design response should be sensitive to the historic City Mills context and the setting of the listed buildings, and to the old High St. <b>By doing so this also supports proposals for a visitor heritage attraction at Lower City Mills.</b>'</p> <p>On p10 an additional illustration is proposed to help show elements of the overall vision.</p> <p>On p16 a photo of North Inch mobility corridor is proposed as an existing example</p>



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			<p>of a high amenity corridor which encourages modal shift.</p> <p>On p 17 images are proposed to illustrate elements of a mobility hub.</p> <p>On p30 an illustration for SUDS is proposed which shows above ground treatment as close to source as possible, and on p31 images are proposed to show green roofs.</p> <p>On p38 a photo is proposed showing private communal open space.</p> <p>On p39 an image is proposed to show high amenity balcony provision which provides privacy and shelter.</p>
<p>Considers that the document contains a lot of details, there is repetition, and it is not user-friendly.</p>	<p>A member of the public</p>	<p>The brief is written for a variety of users, principally for the general public, planners, developers, and consultees of a planning application process. It needs to be able to communicate to all, and it is pitched for everyone, and as such it is a compromise between their needs.</p>	<p>The brief has been amended to improve its visual content and communication. See changes proposed above in response to Architecture and Design Scotland's comments.</p>

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		<p>There is repetition between various sections as the brief follows a design process. This repetition is necessary as the thread is that analysis informs the vision, and later guidance sections are informed by the vision. Removing repetition would impact on the communication of this design process. The brief could be more user friendly for the public, but to do this could undermine its role of informing the planning application process. However, improving the visual content of the brief should make it easier to understand the vision.</p>	
General comments (Implementation of the brief)			
<p>Considers that the brief raises some fundamental questions around approach to procurement, delivery, and the role/potential of the Supplementary Planning Guidance (SPG) to set the qualities PKC are trying to achieve.</p> <p>Architecture and Design Scotland (A+DS) were recently involved in the review of a Council led development in the Scottish Borders and some aspects of this could be applicable at Thimblerow. The key recommendations included:</p>	<p>Architecture and Design Scotland</p>	<p>Note the potential support that can be provided, and PKC will seek further discussions with Architecture and Design Scotland (A+DS) so we can determine the scope for possible assistance/input from A+DS on this project.</p> <p>A PKC project group has been formed and its members have guided preparation of this brief and will work with Estates in seeking to deliver the aims of the brief through the sale missives and development agreement to be secured with the selected developer.</p>	<p>Add the following text to the Planning Policies section p43.</p> <p>Housing Mix: At least 10% of the proposed houses should be one or two bedroom in order to meet the needs of smaller households including older people and lower income households. This will be in addition to the affordable housing requirement. There is also a requirement for up to 10% of the development to be designed, or capable of adaption, to meet the needs of</p>

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<ul style="list-style-type: none"> <li>• Further establishing governance to bring the perspectives of Council as landowner and policy maker together and create transformative change (this role goes beyond the terms of the SPG)</li> <li>• The development of a feasibility study, to test and define project objectives, different options and scenarios for the development of the site – ideally as part of a wider masterplan for the site/area</li> <li>• Setting early benchmarks for a quality public realm and ensuring consistency in quality of development over the delivery period – using a Design Code as a tool to set sense of place and manage delivery over time.</li> <li>• Exploration of appropriate housing and care typologies, and procurement models</li> <li>• Setting parameters for built form – urban form, density, building heights, massing</li> <li>• Prioritising a fabric first approach to help achieve low carbon ambitions and placemaking objectives</li> </ul>		<p>These comments principally highlight potential opportunities for the development phases to follow rather than highlighting amendments for the brief itself. However although there is reference to the LDP Housing mix policy some high level guidance in the brief would be beneficial.</p>	<p>households with specific housing needs, for example, wheelchair users. Work is being undertaken to identify where in the Council area there are clusters of households which have specific housing needs. However, the location of this site in the heart of the city centre with close proximity to shops and services means that it is well located to meet the needs of households with a range of needs including wheelchair users. The developer should therefore take this additional requirement into account in the design of the development.</p>

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<p>Given the level of public interest elements involved there may also be benefit in exploring a partnership approach such as the Public Private Partnership vehicle for the Arnott's site in Paisley <a href="https://www.ads.org.uk/ht2040report_towncent_reregeneration/">https://www.ads.org.uk/ht2040report_towncent_reregeneration/</a>. Also here on page 23 <a href="#">Housing to 2040 - The Scottish Government</a>.</p> <p>Perhaps going forward A&amp;DS could offer further support around helping PKC to develop something like a design code, with imagery – to help establish effective procurement and delivery of the site. This could take the form of a sort of implementation workshop, bringing together a cross service group with officers from the Council.</p>			
Relevant section/paragraph of Guidance			
1. Introduction			
No comments			
2. Context and Analysis			
No comments			

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3. Overall Vision			
Supports the concern for the environment and for people.	A member of the public	Noted	None
Excited about opportunity for sustainable lifestyles, less car ownership, possibilities of housing for older people, and supports balcony or communal open space provision.	A member of the public	<p>Noted there are requirements in the brief which largely cover these aspirations whilst the planning application process will further define the exact nature of the proposal.</p> <p>However there was no guidance on housing for older people and this is something that will be further considered at the planning application stage. The brief only referred to Policy 25: Housing Mix. However with its city centre location this is a key policy for this site. It is considered that the brief should provide some guidance on implementation of the housing mix policy.</p>	The brief has been amended to add in some guidance on Housing Mix (p43) providing guidance on meeting the needs of householders with a range of needs.
Supports lade green corridor, but prefers more greenspace, more parking, and less buildings. Considers empty commercial properties within Perth city centre could be developed/restored further before approving newbuilds.	A member of the public	Reuse and repurposing of existing building stock is important however the LDP2 is required to meet housing needs and demands, and this requires the Council to also identify sufficient land for development. The principle of	None

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		<p>development on this site has been established by LDP2.</p> <p>Comments on amount of parking are considered in more detail in the Low Carbon for City Guidance section. However parking areas should not be over generous as this would be an inefficient use of city centre land. This location has easy access to city centre facilities and excellent public transport links. This means that the people living here will not necessarily need or expect to have access to their own car. This site promotes sustainable lifestyles and should be developed as relatively high density combined with high quality public and private open space.</p>	
<p>As private citizen and as a member of ByCycle applauds the fundamental development aims:</p> <ol style="list-style-type: none"> <li>1. Low carbon vision with a modal shift from cars to walking and wheeling and a strong link to the Dunkeld Road Corridor.</li> <li>2. Recognition of health benefits of active travel and of reduced air pollution.</li> </ol>	<p>A member of the public</p>	<p>Noted</p>	<p>None</p>

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<p>3. Recognition that active travel through the city centre is likely to increase footfall in city centre shops.</p> <p>4. Attention to visual impact of city centre living in this historic quarter.</p> <p>5. Attention to environmental impact of retaining trees, creating green spaces and protecting the biodiversity of the Lade.</p> <p>6. Attention to low carbon heating solutions.</p>			
<p>NatureScot support the overall vision which includes proposals for low carbon living; a shift in emphasis from cars to people; improving the public realm through creating more space for people post covid-19 and making it more greener; plus protecting and enhancing the Lade biodiversity and other important trees. Both biodiversity loss and climate change are interlinked and as such, are being addressed as a twin-crisis. NatureScot seek opportunities for improving biodiversity throughout the whole development brief area, and NatureScot therefore suggest that opportunities for improving biodiversity is a cross cutting theme of the document. For example, including landscaping and planting for providing green corridors and enhancing biodiversity should be</p>	NatureScot	<p>Note support for overall vision. Agree that biodiversity is a cross cutting theme and as such it is picked up in various parts of the brief. It is noted that further NatureScot comments have suggested amendments to better clarify the biodiversity requirements. Specific amendments have been identified to support this in their other comments.</p>	<p>Please see responses to other NatureScot comments to see the biodiversity amendments proposed.</p>

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central to the design process for each element of the brief. This approach can help provide nature-based solutions for climate change, as well as connect people with nature which can help to improve people's health and wellbeing.			
4. Low Carbon Vision			
Supports the commitment to safer, more extensive cycle path provision, but expresses concerns about suitability of the wider network within the city centre.	A member of the public	Note support for the cycle path provision within the brief area. The Council acknowledges and addresses through the Perth Cycle Network Masterplan the scale of the task in relation to the wider network.	None
As a cyclist the proposed changes makes cycling in Perth more appealing and safer.	A member of the public	Noted	None
SEPA (Scottish Environment Protection Agency) support the focus on sustainable and low carbon mobility, particularly the positive impacts that they can deliver, for example reductions to impacts on air quality in the Thimblerow area. SEPA also support the inclusion of the Low Carbon Vision relating to mobility. References to Mobility provides a more inclusive approach to all	SEPA	Noted	None



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types of mobility and requirements for space and access needs.			
4. Low Carbon for City Guidance			
Express concern about proposed loss of parking opportunities. Consider the loss of public carparking provision will adversely impact the public and businesses within the city centre.	5 Members of the public	<p>A public carparking analysis was carried out and this establishes there would be sufficient capacity in surrounding car parks (see Appendix 2 City Centre Analysis map p6) to accommodate the displaced parking demand of vehicles that currently use Thimblerow car park if we enhance accessibility and encourage modal shift. This analysis considers local provision within West central Perth as well as the overall Perth provision.</p> <p>There is residential permit parking within PKC public carparks. In terms of existing resident parking, we have 0 resident permits specific to Thimblerow itself. We do have around 30 Residents who have permits in the surrounding area (High Street/Milne Street). PKC offer Canal Street Multi-Storey in the first instance to a resident as their choice of long stay car park, and the number of Resident Permit holders with access to Thimblerow should be in the low single</p>	None

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		<p>figures. It should be noted nobody has a dedicated right to park at Thimblerow.</p> <p>This brief and the Perth Cycle Network Masterplan (of which the DRC is the first stage of) are ambitious in their vision and scope and will encourage modal shift. However, the modal shift measures are being proposed alongside retention of Paul St and Mill Wynd public car parks to ensure a balanced pragmatic approach as we manage that transition.</p> <p>Active travel is healthy, accessible and inclusive and pedestrians are the lifeblood of town centre businesses. The reasoning behind our approach to focus on accessibility thinking about people rather than cars is more fully explained in the brief (Appendix 2 particularly p15). However, in summary, there are health and wellbeing reasons for prioritising sustainable travel and sound evidence from elsewhere of business benefits.</p> <p>Alternative accessibility solution/s are proposed alongside the reduction of public car parking. A shift from private car to active travel is emphasised through the required connection to</p>	

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		<p>the DRC (pedestrian/cycle corridor) and provision of a mobility hub (including cycle parking, shower, lockers, and changing facility) which should also be delivered to support the development and to achieve modal shift targets. Investment in additional sustainable modes beyond these will be established at the planning application stage. This should be based on quantified trips generated by the development and the proposed reduction of the public and residential car parking with appropriate mode share targets and measures identified for the development that help achieve the agreed objectives.</p> <p>There also needs to be further local public/business engagement to ensure the retained Paul Street and Mill Wynd car parks are best managed to support their needs. The brief acknowledges there will be a requirement to establish length of stay for these spaces, again further assessment and consultation will be required, however shorter stay limits of less than 4 hours should be considered to limit/mitigate commuter use and maximise turnover to aid local business and people visiting for shopping/leisure uses.</p>	

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<p>Supports mobility corridors and wide pavements for people/tables/benches/cycles and the one-way system which will avoid congestion. Also supports bike storage and provision for bike maintenance, cyclists' toilets and showers.</p> <p>Comments on difficulties for resident parking, and suggests areas should be reserved for resident parking within public parking and there should be an increase in charging facilities.</p>	<p>A member of the public</p>	<p>Comments of support for the modal shift measures are noted.</p> <p>There is residential permit parking within PKC public car parks. In terms of existing resident parking we have 0 resident permits specific to Thimble row itself. We do have around 30 Residents who have permits in the surrounding area (High Street/Milne Street). PKC offer Canal Street Multi-Storey in the first instance to a resident as their choice of long stay car park, and the number of Resident Permit holders with access to Thimble row should be in the low single figures. It should be noted nobody has a dedicated right to park at Thimble row.</p> <p>It is agreed that there should be an increase in charging facilities. In terms of public parking charging facilities, the brief requires, 'In terms of the Electric Vehicle (EV) requirements for the public car parking, there is requirement for provision of two semi-rapid chargers (22Kw) and two rapid chargers (50Kw)'. In terms of residential parking the brief requires 'For any townhouse with frontage private parking,</p>	<p>None</p>

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		<p>passive provision for future installation of home chargers should be provided. In terms of communal private car park provision, 10% of parking provision should be provided with slow chargers (7Kw) with the preference of use given to residential EV owners. If there are proposed to be car club spaces this EV provision is required in addition to the 10%.'</p>	
<p>Considers reduced car parking facilities may reduce house prices. Also considers potential buyers may be put off by lack of nearby spaces.</p>	<p>A member of the public</p>	<p>PKC haven't required a zero car proposal associated to the new residential development but the amount of residential carparking required is lower than normal to take into account its location within the city centre with good access to services and amenities and public transport. The Council encourages further reduction/zero car parking if this is proposed alongside further modal shift measures (p19). House prices are not a planning consideration however the developer has flexibility on how far to pursue lowering car parking spaces acknowledging they are in better position to assess marketability and demand and acknowledging that we are in a period of transition with regard to modal shift.</p>	<p>None</p>

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<p>Considers that bus service improvement is needed.</p>	<p>A member of the public</p>	<p>The brief has identified some definite interventions which are active travel/mobility based improvements (DRC extension and mobility hub) and other improvements may also be required. Further interventions will be determined later in the process when there is a detailed proposal and a planning application. This process of identifying Potential Additional Objectives (and interventions) is outlined in the brief.</p> <p>The brief acknowledges that, ‘The Scottish Government has committed to achieving a 20% reduction of vehicle kms by 2030 and the council are also committed to achieving ambitious climate change, carbon reduction and air quality targets. To achieve these outcomes the Council will set high level objectives for modal shift, reflecting on the degree to which the proposal seeks to reduce the 200 space public parking requirement from LDP2, and reduce the residential car parking standards from the maximum standard identified. Based on these details the Council will identify the number of trips that need to be accommodated on sustainable transport and how this will be achieved will need to be demonstrated through</p>	<p>None</p>

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		the Transport Assessment and associated travel plan.'	
<p>Considers the proposals are not bold enough given the current state of cycling infrastructure and routes in Perth. Supports the idea of a mobility hub. Considers the brief has retained carparking and has not really defined how the users will share this space. Considers that cars are still at the top of the hierarchy in Perth.</p>	<p>A member of the public</p>	<p>There is a culture change happening and the brief and the Perth Cycle Network Masterplan will help facilitate modal shift, but we are on a journey. At this point PKC do not feel it is appropriate to restrict the market entirely by insisting on zero car parking for residents, or removing all public parking from the site due to potential impacts. This type of change is likely to be more painful, and have negative impacts for the public and for businesses. We are looking to manage the transition.</p> <p>This brief and the Perth Cycle Network Masterplan (of which the DRC is the first stage of) are ambitious in their vision and scope. PKC would like to improve alternative facilities to promote the modal shift and reduce rather than remove all the provision for car users within the site.</p> <p>Retention of Paul St and Mill Wynd Car parks (retaining 52 spaces) for shoppers and visitors is a significant shift (as PKC is no longer asking for</p>	<p>None</p>

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		<p>the development to incorporate 200 minimum public car parking). Based on the parking review it isn't desirable to remove all public parking. PKC also haven't required a zero car proposal associated to the new residential development but the amount of residential carparking required is lower than normal to take into account its location within the city centre and the Council encourages further reduction if this is proposed alongside further modal shift measures (p19).</p> <p>Please see Amenity Vision for Residents map p36 where significant space is devoted to the mobility corridors (for pedestrians and cyclists) along the Lade, and from the roundabout on Caledonian Road to Paul St/ West Mill St, and also along the Green Street/High St (which proposes a reduction to 1 way for vehicles and more space for pedestrians and cyclists is required). The brief seeks limited vehicle access/penetration within the site (see shared surface areas p36). The primary focus for shared surface areas is a high place space which is designed with a user hierarchy which favours pedestrians and is designed for low speeds and high amenity. These principles are set out in the</p>	



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		brief and further details of how this will be taken forward will be considered at the planning application stage.	
Expresses concern that there is not sufficient emphasis on the safety of pedestrians with increased cycles. Also concerned about the management and safety of the cycle hub, especially in the evenings/overnight.	A member of the public	<p>The specification of the mobility corridors minor (3m) and major (4m) is to ensure there is sufficient space for accommodating both pedestrians and cyclists in a safe way.</p> <p>With regard to the mobility hub the location chosen at the junction of the High St and Paul Street is a highly visible location on the junction of key routes. This makes it the best location for natural surveillance and safety. The detailed design proposed at the planning application stage will consider how design can help promote safety whilst management arrangements will be determined by the operator.</p>	None
Public Transport Unit consider it would be helpful to provide a large Real Time Passenger Information screen at the Mobility Hub or junction of Paul Street/West Mill Street where the Major and Minor Mobility Corridors meet. The exact location could be discussed in due course.	Public Transport Unit	Agree this should be added to the Additional Guidance for the specification for the mobility hub. It currently refers to developing appropriate signage.	Amend Additional Guidance for the specification for the mobility hub (p17) to refer to signage (including a large real time passenger information screen).

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<p>NatureScot support the proposed low carbon measures for both visitors and residents, such as the provision of a mobility hub with cycle parking; changing and showering facilities to promote and encourage active travel options; plus EV provision. NatureScot also support the aim to provide key pedestrian and cyclist routes along the Lade and to improve access to the city centre as well as focussing on high amenity space. There are significant opportunities to extend and include the Lade as part of the wider green network throughout the development brief area, by including it in the design for the proposed road and mobility corridors as well as other new access routes throughout.</p> <p>There is mention of the requirement for landscaping and planting, however, NatureScot would recommend replacing this with the requirement for biodiverse green corridors which can provide many benefits including improving air quality and helping to make active travel options attractive options, plus encouraging people to stay longer on shopping trips and helping to improve the local economy. Green networks can also provide nature-based solutions to address climate change and help work towards</p>	<p>NatureScot</p>	<p>Note support for low carbon measures.</p> <p>There is mention of the requirement for landscaping and planting along the mobility corridors and it is considered that this should refer to biodiverse green corridor. The Amenity Vision mapping (p24) shows the mobility corridors as green corridors. It was the intention that the proposed landscaping and planting here would function as green biodiverse corridors. Amendments are proposed to clarify this. Also the information on nature-based solutions that Nature Scot refer to would be helpful within the Good Practice Library.</p>	<p>Amend the text (p16) which requires landscaping and planting to refer to this providing biodiverse green corridors, and also amend Amenity Vision for City (p24) and Amenity Vision for Residents mapping (p36) to refer to biodiverse green corridors.</p> <p>Add link to guidance on nature based solutions to the Good Practice Library (p46).</p>

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<p>zero carbon emissions. More information on Nature-Based Solutions can be found at the following link: -  <a href="https://www.nature.scot/climate-change/nature-based-solutions/nature-based-solutions-urban">https://www.nature.scot/climate-change/nature-based-solutions/nature-based-solutions-urban</a></p>			
<p>Perth and Kinross Heritage Trust (PKHT) welcome the emphasis on a low carbon development but believe the focus solely on low carbon in-use may be too narrow. The brief could, for example, also require minimising the embodied carbon footprint through prioritising the use of low carbon materials and low-carbon life-cycle, in accordance with current best practice among local authorities and other public bodies.</p>	<p>Perth and Kinross Heritage Trust (as a heritage charity and neighbour rather than as PKC consultee to support planning application process)</p>	<p>It is agreed that the brief could better pick up on the use of low carbon materials and low carbon life cycles. There was some text within the Waste guidance which would now be better included alongside this new requirement.</p>	<p>On p17 add an additional requirement as follows, 'Requirement: Seek to minimise the embodied carbon footprint in construction through prioritising the use of low carbon materials and low-carbon life cycle. 'and move and amend the following guidance around minimising waste local sourcing of materials which was previously in the Waste guidance 'Additional Guidance: The developer will be required to prepare a statement to clarify how they have sought to minimise the embodied carbon footprint. This statement should also consider the use of recycled construction materials and locally sourced sustainable materials and minimise onsite waste levels.'</p>
<p>5. Low Carbon for Residents Guidance</p>			

Summarised comments	Received from	PKC Officer response	Change to be made to Guidance
<p>Notes it is suggested there will be an underground car-park, for instance. If so, this doesn't really address the whole 'put the car at the bottom of the hierarchy' plan.</p>	<p>A member of the public</p>	<p>PKC haven't required a zero car proposal associated to the new residential development but the amount of residential carparking required is lower than normal to take into account its location within the city centre and the Council encourages further reduction/zero car if this is proposed alongside further modal shift measures (p19). There is a culture change happening and the brief and the Perth Cycle Network Masterplan will help facilitate this, but we are on a journey. At this point PKC did not feel it is appropriate to restrict the market entirely and insist on zero car parking.</p>	<p>None</p>
<p>Considers the parking provision for new householders to be insufficient</p>	<p>A member of the public</p>	<p>PKC haven't required a zero car proposal associated to the new residential development but the amount of residential carparking required is lower than normal to take into account its location within the city centre. This location has easy access to city centre facilities and excellent public transport links. This means that the people living here will not necessarily need or expect to have access to their own car. This location promotes sustainable lifestyles and allows promotion of a low car or zero car</p>	<p>None</p>

Summarised comments	Received from	PKC Officer response	Change to be made to Guidance
		proposal where alongside sufficient measures to promote modal shift.	
<p>There is a need for service and delivery vehicles to have 24/7 access to properties.</p>	<p>A member of the public</p>	<p>The brief requires a swept path analysis to show that no complicated manoeuvres are required for service vehicles, and it highlights emergency vehicles need to be able to get to within 45 m of all points within a dwelling. The brief also requires the access for the parking courts to be suitably controlled. Further details will be provided when there is a detailed proposal at the planning application stage.</p>	<p>None</p>
<p>SEPA support the “Vision for low/zero carbon affordable heating solutions” and the position that has been taken in line with the Scottish Government’s New Build Heat Standards and the role that low/zero carbon heating systems can play in delivering the Scottish Government’s targets to reduce carbon emissions and meet climate change targets.</p> <p>The desk top survey outlined in the Development Brief will be useful for future applications, and we support the explicit identification for an Energy</p>	<p>SEPA</p>	<p>Noted</p>	<p>None</p>

Summarised comments	Received from	PKC Officer response	Change to be made to Guidance
<p>Statement to inform possibilities for future development. Considering heat and energy demands, and the options to minimise these and supply remaining demands through low/zero carbon means is essential in order to support the delivery of the Scottish Government's target of net-zero greenhouse gas emissions by 2045.</p>			
<p>PKC are currently involved in two projects (being led by external partners) that are about to formally commence that will be exploring the potential techno-economic feasibility and thereby opportunities for heat networks in Perth City Centre and the surrounding area. Thimblerow development is a project that has been specifically flagged for consideration given the development interest, Council land ownership and location within the city centre close to other key buildings in terms of heat demand. This techno-economic heat network feasibility work will explore a range of parameters (building heat demand, building ownership i.e. public sector, anchor loads, linear heat density, future developments, social housing/fuel poverty, phasing, routing, etc) and provide detailed outputs in terms of potentially</p>	<p>Andrew Ballantine (Development Plans officer)</p>	<p>Noted, the timescales for finalising this brief is before these two projects are completed but it is noted that their outcomes can inform the planning application process, and preparation of an energy statement which is a LDP2 requirement for the site.</p>	<p>None</p>

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<p>viable options that are costed and phased, and could support investment decisions for decarbonised heat transition in the city.</p> <p>In terms of the timescales for this work, the projects are likely to produce outputs in Autumn 2021 (subject to successful completion of each project). Depending on the timescales for adopting the development brief the outputs from this work should provide a basis from which the low carbon vision for the site can be considered through the planning application process. Specifically the outputs from this work will inform the preparation of an energy statement as a LDP requirement for the site.</p>			
5. Amenity Vision for City			
None			
5. Amenity Vision for City Guidance			
<p>Expresses concern about the proposed height of the buildings and prefers under 3 storeys to allow more light into the street.</p>	A member of the public	Placemaking commits us to producing sustainable, well-designed places and homes which meet people’s needs by harnessing the distinct characteristics and strengths of each	None

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		<p>place to improve the overall quality of life for people.</p> <p>This location has easy access to city centre facilities and excellent public transport links. The existing characteristics of the High St and Caledonian road require a suitable height of development to provide for appropriate enclosure of the street, and to reflect street hierarchy and building heights. This site should therefore be developed as relatively high density residential combined with high quality public and private open space. The guidance acknowledges the different character zones, and the City Mills zone should be maximum 3 stories, whilst the Caledonian Road (3-5 stories) and High St zones (3-5) require greater height. It proposes that any parking areas are located in southern and eastern areas within courtyard to give car free space and garden space within sunniest less overshadowed areas.</p>	
Notes requirement for some properties fronting the Old High Street to be for a mixture of commercial and community use. Considers that priority be given to organisations which offer	A member of the public	Noted, this is an interesting idea. It is agreed that investment in people is important and there is some interest from an equality organisation in finding premises within Perth.	None



Summarised comments	Received from	PKC Officer response	Change to be made to Guidance
<p>support and training to families and young people, crime prevention and drug-use prevention. Considers investment in giving people of all backgrounds hope and life skills to thrive is of the utmost importance in regenerating our cities and building healthy communities so request that this is considered in the way that Thimblelow is used.</p>		<p>This interest may be progressed within Thimblelow, but alternatively it could be better met elsewhere. At this stage there is no detailed proposal and we do not know yet what size of unit/s will be available, or what the community needs and demand are. This will be established alongside the selected developer's preparation of a detailed proposal and this is when the Council will further define its landownership requirements through the sale/development agreement with a selected developer.</p>	
<p>Supports Thimblelow Green Street proposal. Considers a logical addition would be to incorporate the cafe culture and pedestrian theme to the St. Paul's square area (reflecting the considerable investment in the church project). Seeks upgrade of the surrounding pavements/road to a pedestrian area where the small businesses can flourish and provide event space.</p>	<p>A member of the public</p>	<p>Note support for phase 1 of the Green St which is part of the brief area (see location plan p5). PKC is also interested in tie in of this Thimblelow development with the wider area and so it identifies Phase 2 Green St which seeks to continue this focus on improving pedestrian/business space further along the Old High St as far as South Methven St (see Amenity vision p24). There is a need to look at the funding opportunities for the implementation of Phase 2 Green street. The Council will look to the implementation of phase 2 Green street later but not as part of this proposal.</p>	<p>None</p>

Summarised comments	Received from	PKC Officer response	Change to be made to Guidance
<p>Considers smaller businesses should be encouraged to take the commercial spaces. Considers the area around St Paul's should be developed into an arts and crafts area, with appropriate incentives. Concerned about the health of the High Street in Perth. Does not want pubs or predominance of coffee shops and charity shops, instead seeking diversity to encourage shoppers.</p>	<p>A member of the public</p>	<p>There are a lot of smaller units available within Perth City centre. However the type of units available for commercial or community purposes within this site will typically be small, being ground floor units beneath flatted development.</p> <p>The planning authority will not be able to control the specific types of shops or businesses just the type of uses that would be appropriate such as retail, leisure, professional services, and food and drink, and will welcome active commercial uses which generate significant footfall. With regard to pubs there is a presumption against the siting of these in the midst of other (particularly residential) uses where problems of noise or disturbance cannot be satisfactorily addressed.</p> <p>The ideas for an arts and craft area are interesting and are something which should be considered as a detailed proposal is progressed. At this stage there is no detailed proposal and we do not know yet what size of unit/s will be available, or what the market demand is and what is feasible. This will be established</p>	<p>None</p>

Summarised comments	Received from	PKC Officer response	Change to be made to Guidance
		<p>alongside the selected developer's preparation of a detailed proposal and this is when the Council will further define its landownership requirements through the sale/development agreement with a selected developer.</p>	
<p>Comments on lack of timeline for Phase 1 and Phase 2.</p>	<p>A member of the public</p>	<p>Timescales cannot be specified. The Green St Phase 1 will be delivered alongside the proposed development and will depend on the private sector developer. Phase 2 is identified as an aspiration for the Council and will depend on funding opportunities.</p>	<p>None</p>
<p>Queries who will manage the public parkland area and how dogs will be managed throughout the area, but particularly in the public parkland.</p>	<p>A member of the public</p>	<p>Maintenance will be a matter considered further at the planning application stage. The brief requires that 'The proposal should clearly identify the function and proposed maintenance arrangements for each open space area. Further guidance is provided in Open Space Provision for New Developments Supplementary Guidance and Maintenance Options for Public Open Spaces in New Residential Developments Policy 2020 guidance. Although developers can opt for private arrangements for some areas, Council adoption of all Public Open Space within a</p>	<p>None</p>

Summarised comments	Received from	PKC Officer response	Change to be made to Guidance
		development is preferred as it is a simpler process.' It will depend on the details and function of the spaces but at the planning application stage if it is considered that this public park will function as priority open space then the Council will require that this is adopted and maintained by the Council.	
Concerned about safety and seeks a police presence	A member of the public	The brief and the planning application process that follows cannot control the future policing of the area. However they can ensure a development which promotes safety. The brief requires fronting of development onto public open spaces and mobility routes to increase natural surveillance. Also the brief notes, 'Blank walls in the public realm should be avoided as they are visually unappealing and can cause problems with the lack of passive surveillance, and can become a focus of antisocial behaviour'.	None
Queries how will each user be accommodated on the street with the extension of businesses into the public realm, the fact that the high street will still be used for cars as well as provisions for cyclist and pedestrians?	A member of the public	The brief identifies the principles, 'The gained space from reducing a car lane should be used to increase pavement provision to 3m, providing landscaping, possibly cycle parking shelters for the mobility hub, and for improving the public	None

Summarised comments	Received from	PKC Officer response	Change to be made to Guidance
		<p>realm with consideration given to including outdoor seating space for businesses. This is a bid to create more space for people post-pandemic, as well as encourage a greener, accessible and more pedestrianised version of the city. The developer should contact the Place Development Team to consider how they might integrate outdoor seating space for businesses within their proposal.'</p> <p>When a planning application proposal comes forward the developer will develop a detailed design. Space for businesses will not be along the full length but there may be a requirement for some discrete areas to be created. In the meantime the brief sets out the principles which will inform this design process, and highlights that the PKC Place Development Team should be involved in the process.</p>	
SEPA support the requirement for integral above ground multifunctional Sustainable Urban Drainage systems (SUDS) as a component of landscape design from inception and note this accords with an infrastructure first approach.	SEPA	Noted	None

Summarised comments	Received from	PKC Officer response	Change to be made to Guidance
<p>NatureScot note that for Section 5. 'Amenity for City Guidance' on page 27 states that landscaping and planting 'should look to provide biodiversity benefits' and so on, however, this can be interpreted as optional, and NatureScot would suggest that landscaping and planting that provides biodiversity benefits are key to placemaking priorities throughout the brief. The additional guidance on page 27 should also note how increasing biodiversity can benefit people through connecting them more with nature as well as improving quality of life.</p>	<p>NatureScot</p>	<p>Agree that the draft guidance could be interpreted as identifying that biodiversity benefits are optional. This was not the intention and amendments are proposed to clarify this, replacing 'should look to' with 'will be required to' provide biodiversity benefits. Also it is agreed that it would be useful to highlight the health benefits of connecting people with nature so an additional sentence has been proposed to cover this.</p>	<p>Amend guidance on p27 to (amended text in bold) 'Requirements: Landscaping and planting <b>will be required</b> to provide biodiversity benefits. Plans should avoid tree loss by incorporating trees into design where possible. Where tree loss is unavoidable, mitigation in the form of compensatory planting will be required. Additional guidance: Enhancement measures should be provided. Landscaping and planting <b>will be required to</b> provide biodiversity benefits particularly for bats, birds and pollinators. Provision for swift nesting would be sought in buildings 2 storeys or more and additional swift tower provision is encouraged. Provision would also be required for bats, particularly along the edge with the lade. <b>Increasing biodiversity can benefit people through connecting them more with nature as well as improving quality of life.'</b></p>
<p>NatureScot welcome the integration of SUDS and the need for them to be multi-functional. Section 5, page 31 provides more detail on design which is welcomed. NatureScot also note biodiversity included in one of the diagrams p30.</p>	<p>NatureScot</p>	<p>Welcome NatureScot support for the integration of SUDS and the brief's requirement for them to be multi-functional. Whilst the diagram highlights biodiversity as part of this it is agreed</p>	<p>Amend guidance on (p31) to (amended text in bold) 'Drainage and Flood Risk (surface water and river) infrastructure should consider grey to green approach and design</p>

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<p>NatureScot recommend including the need for biodiversity benefits to be included in the main text to ensure that the importance of these measures are highlighted. With good design principals including working with nature, measures for enhanced biodiversity should be included to help increase the multi-functionality of the SUDS as well as minimising the need for maintenance.</p> <p>Opportunities should also be sought to identify how landscaping and soil can help to capture and manage rain and storm water. Some examples include, incorporating green walls, rain gardens and impervious surfaces with planting and street trees.</p>		<p>that the text could be amended to highlight the need for biodiversity benefits.</p> <p>Some examples/opportunities to retain water (bioretention areas, channels, rills, bioretention areas and green roofs) are already referred to p31 and a cross section of a bio retention feature is shown p30. The principle of all greenspace being designed to be multifunctional and part of the SUDS network is also mentioned and this should maximise the opportunities to manage rain and storm water above ground.</p>	<p>in mitigation measures which also create an attractive and <b>biodiversity rich</b> environment.</p>
<p>With regards to Green Streets, NatureScot note section 5, page 34 provides more detail on the design, where focus is on a one way system, creating more space including more pavements and landscaping. NatureScot would suggest that part of the aim of the Green Street would be to demonstrate how nature-based solutions can be an integral part of the design. The focus on landscaping for both visitors and residents should</p>	<p>NatureScot</p>	<p>Agree that there is potential for new landscaping within the High St to have biodiversity benefits and this should be made a requirement.</p>	<p>On p34 amend the guidance to add reference to biodiversity benefits sought (amendment in bold), 'The proposed Green Street involves change to a one way system combined with <b>biodiverse</b> landscaping and pedestrian/cyclist lane requirements which should allow for greater privacy and amenity through increasing separation from vehicular traffic.</p>

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<p>be on providing multi-functioning benefits, including using planting that increases biodiversity, helps to tackle climate change as well as providing a greener and more pleasant amenity space which connects people to nature, whilst benefiting health and wellbeing.</p>			
<p>NatureScot support the aim on page 9 to protect the natural heritage of the Lade and to use the outcomes of the ecological/tree surveys to inform good design principles which will help to protect and enhance biodiversity at the Lade. Even if minimum measures are proposed to help protect the trees and ecology of the Lade, NatureScot would recommend that the Lade forms part of the wider green network, and that the proposals help meet the aims of the Perth Lade Green Corridor Management Plan 2022-25.</p>	<p>NatureScot</p>	<p>NatureScot support is noted. There is some uncertainty as to what may prove to be appropriate as ecological survey work will be required at the planning application stage to clarify the appropriate response and proposal.</p> <p>The brief acknowledges p28 that if after ecological survey some development here proves suitable the Lade development frontage should be set back from the footway and green corridor. Also the brief identifies a green network along the Lade in its amenity mapping and states, 'Where/if development proves acceptable then there would be requirement to retain a green network corridor alongside the Lade and for a no net loss of overall Lade biodiversity.'</p> <p>It is also acknowledged that the planning balance will need to be found between</p>	<p>None</p>



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		placemaking/planning objectives at the planning application stage and this will consider impact on biodiversity and includes consideration of what contribution is proposed towards wider Lade Management Plan biodiversity actions.	
Perth and Kinross Heritage Trust (PKHT) broadly welcome the approach of a mixed-use development referencing the traditional street pattern, building massing and plot footprints; similarly, the emphasis on the potential ecological importance of the Lade and the retention of established walking and cycling routes into the city centre. PKHT feel the implied move towards smaller scale non-residential units within the development is a good one which fits better with the existing character and use of this part of the city.	PKHT (as a heritage charity and neighbour rather than as PKC consultee to support planning application process)	Noted	None
PKHT feel the brief could do more to reference in detail the value of the Perth Central Conservation Area Character Appraisal <a href="https://www.pkc.gov.uk/media/3796/Perth-Central-CA-Appraisal/pdf/Perth_Central_CA_Appraisal.pdf?m=636491935413270000">https://www.pkc.gov.uk/media/3796/Perth-Central-CA-Appraisal/pdf/Perth_Central_CA_Appraisal.pdf?m=636491935413270000</a> and use this to guide	PKHT (as a heritage charity and neighbour rather than as PKC consultee	Agree the brief would benefit from including reference to the Perth Central Conservation Area Character Appraisal, and the Historic Environment Scotland's New Design in Historic Settings in the Planning Policies and Guidance section. Further consideration to its guidance will be required at the planning application stage	Add reference to Perth Central Conservation Area Character Appraisal, and the Historic Environment Scotland's New Design in Historic Settings in the Planning Policies and Guidance section along with other relevant supplementary guidance documents (p41)

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<p>both design and quality. While we agree that there is a place for the introduction of good quality modern design in Conservation Areas (p30), we also note that modern design frequently leads to a loss of local distinctiveness and increase in generic buildings, detailing and materials.</p> <p>PKHT consider the document should also reference Historic Environment Scotland's New Design in Historic Settings:  <a href="https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationid=9b50b83c-1e60-4831-bc81-a60500ac5b29">https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationid=9b50b83c-1e60-4831-bc81-a60500ac5b29</a></p>	<p>to support planning application process)</p>	<p>when the developer is required to prepare a Design and Access statement.</p> <p>PKC agrees with and already refers to within the brief to the Scottish Government's New Design in Historic Settings guidance. This states that, 'in general we believe that new interventions in historic settings do not need to look 'old' in order to create a harmonious relationship with their surroundings. Some of the best recent examples are contemporary design responses.' However the brief also refers to another quote from Scottish Government's New Design in Historic Settings guidance that, 'A modern building which disregards its setting is very likely to be regarded as unsuccessful both now and in the future.' The Brief highlights these two quotes, as this reflects and indicates the balanced approach sought within this brief.</p> <p>In terms of ensuring local distinctiveness the brief states, 'In terms of general advice for all zones, the Council seeks deep window and door reveals and generally a strong vertical emphasis.' It also acknowledges that 'There also needs to be an appropriate individual response to the different character zones.' There are 3 zones,</p>	

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		<p>the Caledonian Road, High St and City Mills zones. The City Mills zone is the most sensitive with regard to its historic setting. The guidance picks up historic cues for the City Mills Zone as follows, 'The City Mills are large buildings but the historic street pattern in this area was a finer urban grain with some smaller buildings and plots. A rich urban grain including broken frontages is sought. Variation in roof shapes and use of dormers is also a strong characteristic of the Lower City Mills Area. Also generally the facades of blocks/large buildings are of one material. Materials and colour in this zone should reflect the stone colours of the City Mills. This could partly be achieved by use of stone and/or brick. Surface materials need to achieve a high quality public realm, should have a small unit size, and reflect the palette of materials here.' The brief also states that this zone should be a maximum of 3 stories.</p> <p>The brief provides an appropriate level of guidance highlighting the potential for a contemporary response, whilst clarifying the historic and contextual cues which should be picked up. The brief also balances between providing guidance but allowing the developer</p>	

Summarised comments	Received from	PKC Officer response	Change to be made to Guidance
		<p>varying degrees of flexibility depending on sensitivity/characteristics of the area when developing their proposal.</p>	
<p>The PKHT is currently developing a Regeneration through Conservation project at the Lower City Mills, and in terms of the development brief and the City Mills and Lade, we note:</p> <ul style="list-style-type: none"> <li>We feel the development should note the special character created by the setts on West Mill Street and at Mill Wynd through to High Street, and retain these, and in addition consider adding a new section at the west end of West Mill Street to High Street in the new design. Loss of the setts around the City Mills will deteriorate the setting of these A-listed buildings.</li> <li>Enhancement of the lade in this stretch could be beneficial for its use as a heritage amenity, shown recently in the short stretch of Lade to the west of Lower City Mills where the Trust has repointed in lime mortar to match recent work to</li> </ul>	<p>PKHT (as a heritage charity and neighbour rather than as PKC consultee to support planning application process)</p>	<p>It is agreed these setts around the City Mills are important however the brief area does not cover West Mill St or Mill Wynd (please see allocated site p5). The brief shows no proposals for this area and seeks to retain the adjacent existing car parking at Mill Wynd and Paul Street. This is beyond the scope of the brief and there is no proposal within the brief which should affect them.</p> <p>The proposed new section of setts at the west end of Mill Street to High St is within the brief area and is identified as part of the Green St (Phase 1). This area was not identified within any of the character zones, but the City Mills character zone should be extended and applied here as it is an important part of its setting/approach. The City Mills zone has the following guidance, 'Materials and colour in this zone should reflect the stone colours of the City Mills. This could partly be achieved by use of stone and/or brick. Surface materials need to</p>	<p>Amend the City Mills character zone on the Amenity Vision for City map p24 to include Paul St within it.</p> <p>Also there is a proposed amendment and acknowledgment (p9) that the sensitive design sought for heritage purposes also helps support proposals for Lower City Mills as a visitor and heritage attraction. Amending to add the sentence in bold. 'The design response should be sensitive to the historic City Mills context and the setting of the listed buildings, and to the old High St. <b>By doing so this also supports proposals for a visitor heritage attraction at Lower City Mills.'</b></p>

Summarised comments	Received from	PKC Officer response	Change to be made to Guidance
<p>the A-Listed Upper City Mills (Mercure Hotel).</p>		<p>achieve a high quality public realm, should have a small unit size, and reflect the palette of materials here.'</p> <p>This is considered to be appropriate guidance. The developer should propose appropriate materials that meet this guidance. This will be considered further at the planning application stage.</p>	
<p>The PKHT considers that:</p> <ul style="list-style-type: none"> <li>• tree growth along this section of the Lade should be rationalised rather than simply retained. It is heavily overgrown and contains dead and self-seeded trees.</li> <li>• clearing of debris, glass, and vegetation growth in the lade will improve drainage, thus lessen flooding risk. Again, this process has been tested recently at the Lade directly to the west of Lower City Mills.</li> <li>• efforts should include improving signage/use of lade path to North of Lade through the City Mills to West Mill street.</li> <li>• a new footbridge across the lade, directly to the west of the Mercure might be</li> </ul>	<p>PKHT (as a heritage charity and neighbour rather than as PKC consultee to support planning application process)</p>	<p>The details of a proposal will be available at the planning application stage however the brief's guidance will ensure an appropriate approach to the lade taking account of an Ecological Impact Assessment and tree survey.</p> <p>With regard to the suggested improvement of the signage of the lade path through the City Mills the brief area does not cover this area (please see allocated site p5). However the Council independently of this project is considering signage improvements.</p> <p>With regard to the consideration of a new footbridge across the Lade, directly west of the Mercure, this is a possibility. At the planning</p>	<p>Amend guidance p16 which acknowledges the specification of the mobility corridor could be varied from the preferred 3m width depending on the outcome of the ecological assessment to add 'If this specification needs to be varied a more informal path combined with a footbridge immediately west of the Mercure Hotel should be considered'.'</p>

Summarised comments	Received from	PKC Officer response	Change to be made to Guidance
<p>considered as this would link footpath to North of Lade to the City Mills and West Mill street, by-passing currently complex route through residential development to the North of the Granary block.</p>		<p>application stage depending on the nature of the proposal that is identified for the Lade area (which depends on outcome of the Ecological Impact Assessment and tree survey) and the width and nature of the mobility corridor that can be provided along the Lade it could be that a footbridge and a more informal path proves to be a better option than a 3m width adoptable standard footway along the lade corridor. This will be considered based on information which will be available at the planning application stage. It is considered that the guidance should be amended to acknowledge this option.</p>	
<p>5. Amenity Vision for Residents</p>			
<p>Supports community gardens, as lack of access to a garden has hit many city centre residents harder than usual. Additionally, spaces for community food growing or allotments, whether this is part of the city centre development or another project would be welcomed.</p>	<p>A member of the public</p>	<p>Agree it is important to provide residents with outdoor space. The brief allows for the overall scheme to provide a mix of private open space for some properties and communal space for others. The brief clarifies communal space may include food growing opportunities.</p> <p>Also wider potential for food growing and allotments is being considered through preparation of a food growing strategy. In early</p>	<p>None</p>

Summarised comments	Received from	PKC Officer response	Change to be made to Guidance
		<p>2021, we engaged further with communities and we are currently in the process of analysing the feedback we received on the draft (over 50 comments). Soon we will finalise the Food Growing Strategy based on comments and identify where we require additional resources to deliver the action plan, then report our findings and finalised strategy back to Committee.</p>	
<p>NatureScot support the aim of limiting residential areas which can be accessed by car to provide car free areas. We also support the options to include green roofs and roof terraces, along with providing seating, trees and planting and potentially food growing areas. Given that ground standards are reduced due to the edge of city centre location, it will be more important to ensure that green spaces that are provided are quality green spaces. This can be achieved through using suitable planting that can increase biodiversity, manage rain and storm water, and ensuring that small food growing areas are provided to help contribute to health and wellbeing, and a good quality of life.</p>	<p>NatureScot</p>	<p>Note the support for the green space requirements for both public and private communal garden areas. As mentioned by NatureScot in addition to biodiversity benefits there are multi-functional water management and health and wellbeing benefits associated with this approach.</p>	<p>None</p>

Summarised comments	Received from	PKC Officer response	Change to be made to Guidance
5. Amenity Vision for Residents Guidance			
None			
6. Planning Policies and Guidance			
<p>Seeks enhanced opportunities for city centre residents to reduce waste and recycle more locally. The new bin hubs are great, but these are often overflowing close to uptake days. Adding recycling bins to the new bin hubs, or food waste disposal points may allow more city centre residents to do their bit in building a greener society.</p>	<p>A member of the public</p>	<p>Agree the brief seeks to provide enhanced opportunities and requires, 'Communal bins storage should accommodate space for general waste bins and dry mixed recycling bins. Perth &amp; Kinross Council have signed up to the Charter for Householder Recycling. This along with upcoming legislation could see changes to kerbside collection services, including making food waste collections from domestic properties mandatory. The developer should include appropriate provision to accommodate upcoming changes. The proposed Deposit Return Scheme for Scotland will look to capture beverage containers, however the developer should look to include a mini glass point within this development for glass not included in the scheme.'</p>	<p>None</p>
<p>Expresses concern about the impact on drainage in the area.</p>	<p>A member of the public</p>	<p>This will be considered in detail and appropriate solutions proposed at the planning application stage. The brief requires, 'The foul and surface</p>	<p>None</p>



Summarised comments	Received from	PKC Officer response	Change to be made to Guidance
		water drainage of the site will require detailed consideration and assessment, in consultation with Scottish Water, SEPA and the Council's Structure and Flood Team. Flood Risk Assessment and a Drainage Impact Assessment will be required.'	
NatureScot note the need for an ecological survey has not been included and recommend that an ecological survey is included in your list of required supporting information. With regards to the River Tay (Special Areas of Conservation) SAC, NatureScot would also recommend referring to the advice to developers when considering new projects which could affect the River Tay SAC, and can be found at the following link: - <a href="https://www.nature.scot/river-tay-sac-advice-developers-when-considering-new-projects-which-could-affect-river-tay-sac">https://www.nature.scot/river-tay-sac-advice-developers-when-considering-new-projects-which-could-affect-river-tay-sac</a>	NatureScot	Agreed the ecological assessment is mentioned elsewhere in the brief but should also be listed in this section as well. Also the River TAY SAC guidance should be added to the Perth and Kinross Guidance that a developer should refer to.	Amend the list of assessments required p44 to include ecological assessment.  Add to the list of Other National Policies and Guidance (p41) to include the River TAY SAC guidance.
7. Next Steps			
None			
8 Good Practice Library			
None			

