



Economy, Development & Planning
Development Management

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Ref No 25/00016/PREAPM

Date 17 July 2025

Dear Sir/Madam

Town and Country Planning (Scotland) Act, 1997
RE: Proposed solar pv development with 50 MW total capacity plus
accompanying infrastructure at Land 750 Metres South Of Newbigging Farm
Tibbermore Perth PH1 1QH

Please find attached a response to your pre application enquiry.

Yours faithfully

Alan Atkins

Planning Officer (Major)

Pre-Application Service



**PERTH &
KINROSS
COUNCIL**

NON-HOUSEHOLDER PRE-APPLICATION ADVICE

All applicants are advised that Perth & Kinross Council encourages the completion of Processing Agreements with all planning applications. The Agreement will set out timescales for the processing of the application, the submission of additional information if required and a target date for the decision or committee date.

All comments are based on the information submitted and are made without prejudice to any decision Perth & Kinross Council may make in the future. It is not usually possible for an officer to consult on a proposal at the pre-application stage but this is part of the formal planning application process, as is public notification. Additional issues may arise as a result of detailed analysis of any submitted application, associated plans and supporting documentation. A site visit will be carried out during the consideration of the application if the case officer considers it necessary.

Further discussion on a revised proposal will normally require to be the subject of a fresh pre-application enquiry (and incurring a further fee). Clarification of comments contained below can be provided by the case officer but no further discussion will be entered into at this stage as to how the policies are interpreted or applied.

CASE DETAILS	
Reference number of pre-app	25/00016/PREAPM
Site Address/location	Land 750 Metres South Of Newbigging Farm Tibbermore Perth PH1 1QH
Details of Proposal	Proposed solar pv development with 50 MW total capacity plus accompanying infrastructure
Case Officer	Alan Atkins
Date	17 July 2025

SITE DESIGNATIONS AND CONSTRAINTS
Flood risk Core paths A90 road Agricultural land Landscape and Visual Impact

RELEVANT PLANNING POLICIES AND GUIDANCE

The National Planning Framework 4 (NPF4)

<https://www.gov.scot/publications/national-planning-framework-4/documents/>

The National Planning Framework 4 (NPF4) is the Scottish Government's long-term spatial strategy with a comprehensive set of national planning policies. This strategy sets out how to improve people's lives by making sustainable, liveable and productive spaces.

NPF4 was adopted on 13 February 2023. NPF4 has an increased status over previous NPFs and comprises part of the statutory development plan.

The Council's assessment of this application has considered the following policies of NPF4 :

Policy 1: Tackling the Climate and Nature Crises

Policy 2: Climate Mitigation and Adaptation

Policy 3: Biodiversity

Policy 4: Natural Places

Policy 5: Soils

Policy 6: Forestry, Woodland and Trees

Policy 7: Historic Assets and Places

Policy 11: Energy

Policy 22: Flood Risk and Water Management

Policy 29: Rural Development

Perth & Kinross Local Development Plan
Policies

www.pkc.gov.uk/developmentplan

The Local Development Plan 2 is the most recent statement of Council policy and is augmented by Supplementary Guidance.

The principal policies are:

Policy 1A: Placemaking

Policy 1B: Placemaking

Policy 8: Rural Business and Diversification

Policy 15: Public Access

Policy 26A: Scheduled Monuments and Archaeology: Scheduled Monuments

Policy 33A: Renewable and Low Carbon Energy: New Proposals for Renewable and Low-Carbon Energy

Policy 33B: Renewable and Low Carbon Energy: Repowering and Extending Existing Facilities

Policy 35: Electricity Transmission Infrastructure

Policy 39: Landscape

Policy 40A: Forestry, Woodland and Trees: Forest and Woodland Strategy

Policy 40B: Forestry, Woodland and Trees: Trees, Woodland and Development

Policy 41: Biodiversity

Policy 50: Prime Agricultural Land

Policy 51: Soils

Policy 52: New Development and Flooding

Policy 53A: Water Environment and Drainage: Water Environment

Policy 53C: Water Environment and Drainage: Surface Water Drainage

Policy 56: Noise Pollution

Policy 55: Nuisance from Artificial Light and Light Pollution

Policy 60A: Transport Standards and Accessibility Requirements: Existing Infrastructure

<p>Other Policies and Guidance</p> <p>https://beta.gov.scot/policies/planning-architecture/planning-guidance/</p> <p>https://www.pkc.gov.uk/ldp2guidance</p>	<p><u>National</u></p> <p>National Roads Development Guide 2014</p> <p>Historic Environment Scotland: Legislation and Guidance</p> <p><u>Perth & Kinross Council</u></p> <p><u>National</u></p> <p>Creating Places: A policy statement on architecture and place for Scotland 2013</p> <p>National Roads Development Guide 2014</p> <p>Historic Environment Scotland: Legislation and Guidance</p> <p><u>Perth & Kinross Council</u></p> <p>Supplementary Guidance:</p> <ul style="list-style-type: none"> • Supplementary Guidance - Flood Risk and Flood Risk Assessments (adopted in 2021) • Supplementary Guidance - Forest & Woodland Strategy (adopted in 2020) • (adopted in 2020) • Supplementary Guidance - Landscape (adopted in 2020) • Supplementary Guidance - Placemaking (adopted in 2020) • Supplementary Guidance - Renewable & Low Carbon Energy (draft) <p>Non-Statutory Guidance:</p> <ul style="list-style-type: none"> • Planning Guidance - Loch Leven SPA, the Dunkeld-Blairgowrie Lochs SAC and the River Tay SAC • Planning Guidance - Planning & Biodiversity
<p>LIKELY CONSULTEES</p>	
<p>PKC Internal</p>	<p>Transport Planning</p> <p>Environmental Health</p> <p>Development Negotiations Officer (Contributions)</p> <p>Structures and Flooding</p> <p>Biodiversity</p>

External	Scottish Water Scottish Environmental Protection Agency Scottish Natural Heritage Historic Environment Scotland
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SUMMARY OF CONSIDERATIONS

Planning Principle

The key determining policy issues for this specific proposal at this location include: the principle of the development and its contribution towards renewable generation targets/net zero agenda, (Policies 33 and 35 of the LDP2 and Policies 1 and 11 of the NPF 4), landscape/visual impact and recreational interests/access, (Policies 15 and 39 of the LDP2), impacts on prime agricultural land (Policy 50 of the LDP2 and Policy 5 of the NPF 4)), impacts on/from flooding and the water environment (Policies 52 and 53A of the LDP2 and Policy 22 of the NPF4), residential amenity (Policies 1A and 1B), cultural heritage & historic environment (Policies 26A, 26B, 27A of the LDP2 and Policy 7 of the NPF4), biodiversity/ecological impact (Policies 40 and 11 41 of the LDP2 and Policy 3 of the NPF4), pipeline and airfield safeguarding (Policies 54 and 61 of the LDP2), and transport (Policy 60A of the LDP2 and Policy 13 of the NPF4).

Policy 33 of the LDP2 generally provides support for the development of renewable and low carbon energy and associated infrastructure, subject to detailed assessment against various environmental and other planning issues. This is also reflected in Policies 1 and 11 of the NPF4, however, stronger emphasis is placed over the contribution of the proposal to renewable energy generations targets than to other landscape and or amenity impacts. Notwithstanding any environmental or other planning issues, the proposal would provide a substantial contribution towards renewable energy generation to support national and local objectives in relation to net zero and carbon emission reduction.

Policy 35 of the LDP2 also supports the development of electricity transmission infrastructure, where this is sensitively designed, and suitable mitigation is ensured. In this case it is not considered that the development is sensitively designed or that suitable mitigation is offered.

Principle of development is supported through LDP2 Policy 33 Renewable and Low-Carbon Energy which states that proposals for the utilisation, distribution, and development of renewable and low-carbon sources of energy will be supported if it contributes towards carbon reduction and renewable energy targets; provides socio-economic benefits and does not adversely affect the function and safety of the road network. The following factors must be taken into account with any planning application including potential mitigation:

- biodiversity and natural heritage assets in area
- trees and nearby woodland
 - landscape and visual impact
- archaeology
- drainage
- residential amenity (visual impact, noise, lighting and glint and glare)
- road safety
- soils
- core paths and public road

Other relevant considerations

Consultation Responses

External

SEPA

Based on the information provided, it appears that this application falls below the thresholds for which SEPA provides site specific advice.

Historic Environment Scotland (HES)

The proposed development lies partially within the Battle of Tippermuir. We are aware that a Battlefield Conservation Plan for Battle of Tippermuir was produced in relation to the unconnected planning application [20/00667/IPM](#). This useful document provides a detailed summary of our understanding of the events of the battle, and the relative sensitivities of the battlefield landscape today. We note that the area of the proposed development contains extant remains of 17th-century field enclosures and field systems, forming part of the landscape which shaped the events of the battle. The NW area of the proposed development has the potential to affect key landscape characteristics, physical remains and special qualities of the Battle of Tippermuir. This should be fully assessed and mitigated through design where required. HES guidance note "[Managing Change in the Historic Environment – Historic Battlefields](#)" provides further information on appropriate assessment and mitigation.

There are a significant number of scheduled monuments in the vicinity of the proposed development, including a concentration of Roman military remains known as the Gask Ridge. The proposed development has the potential to impact on the settings of these assets. A bare earth ZTV should be produced to assess the likely visibility of the proposed development in views to and from the scheduled monuments. Impacts on the setting of the scheduled monuments should be assessed in line with our Managing Change guidance: [Managing Change in the Historic Environment: Setting](#)

Decisions that affect the historic environment should take the [Historic Environment Policy for Scotland](#) (HEPS) into account as a material consideration. Our series of [Managing Change in the Historic Environment Guidance Notes](#) supports national policy on the historic environment, including HEPS, and explains how it should be applied. Technical advice is available through our Technical Conservation website at www.engineshed.org.

Internal

PKC Floods Team

- SEPA maps indicate a small/medium size watercourse running through the Northeast of the site. Localised flooding is shown along its extent.
- The developer must provide a buffer strip (exclusion zone) of a minimum of 6m on each side of the watercourse. If the watercourse is deemed to be a ditch, the strip could be reduced to a minimum of 3m, depending on the requirements for access for maintenance.
- PKC discourages the culverting of watercourses unless absolutely necessary. The approach aligns with national guidance and environmental best practices, emphasising flood risk reduction, ecological protection, and sustainable development. Any proposal to culvert a watercourse must comply with the Flood Risk Management (Scotland) Act 2009.
- Drainage Strategy - It is recommended that the applicant produce a site Drainage Strategy that considers the existing drainage and site modifications. The Drainage Strategy shall outline how the development will manage surface water, including stormwater runoff, groundwater management, and flood prevention. The plan should involve developing and positioning drainage systems while implementing sustainable drainage techniques.

PKC Environmental Health Team

Glint & Glare

The applicant would need to submit a Glint and Glare Assessment in accordance with 'The PagerPower Solar Photovoltaic and Building Development Fourth Edition - Glint and Glare 2022 Guidance which', recommends that residential properties within 1km that have a view of the PV panels should be assessed.

Noise

A Noise Impact Assessment (NIA) for operational and construction noise. Plant associated with the proposed facility in accordance with the methodology contained within BS 4142:2014+A1:2019 Methods for Rating and Assessing Industrial and Commercial Sound, in areas of low background we will either condition it as +5dB above background or as an absolute level. Also, an assessment in terms of NR internal criteria which should not exceed NR35 daytime period and NR25/20 nighttime period depending on background level.

The NIA should be undertaken by a qualified Noise Consultant. The NIA should also take into consideration the cumulative operational noise from any adjacent Substation/BESS, wind turbine and /or solar array farm etc.

PKC Roads and Transportation Team

The applicant had submitted a pre-application for the formation of a major solar pv development with 50 MW total capacity plus accompanying infrastructure at Tibbermore Perth.

The vehicle access to the public road network for the development will be via C411 and U47 public roads. It is not clear where is the access to the site.

On submission of a detailed planning application, the applicant shall consider:

Trip Generation and Transport Network

A full transport assessment is required, detailing the transport issues relating to the proposed development site, baseline transport data, and how predicted trip generation will be distributed on the surrounding transport network. Proposed measures to mitigate adverse impacts on the transport network, and measures to encourage sustainable mode choice shall also be outlined. Guidance on Transport Assessments is available at this [link](#) and full guidance from Transport Scotland is available at this [link](#).

Vehicular Access

The developers need to prove that cars and trucks can safely enter and exit the site from the C411 and U47. They must show that drivers have a clear view of oncoming traffic when pulling out of the access road. This means calculating and drawing visibility splays to the left and right of the access point which measured from a point 2.4 meters back from the road's edge and 1.05 meters above the road and must meet standards set by the government (specifically, the Design Manual for Roads and Bridges - CD 109).

If the visibility splays don't meet the required standards, the developers will have to conduct a speed survey to figure out how fast cars typically drive on the C411 and U47, especially when it's wet. This will help determine if changes to the road or access point are necessary.

The design of the access road itself must follow guidelines from the Perth & Kinross Council [guidance](#). The road should be able to handle the biggest vehicles expected to use it, and these vehicles should be able to drive in and out without having to reverse. The slope of the access road shouldn't be too steep (no more than a 3% incline) for the first 5 meters from the main road. The access road must be built so that rainwater doesn't flow from it onto the C411 and U47. To make sure the slope is okay, the developers will need to do a level survey of the land.

PKC Biodiversity Officer

NPF4 Policy 4 Natural Places

- f) Development proposals that are likely to have an adverse effect on species protected by legislation will only be supported where the proposal meets the relevant statutory tests.

Detailed ecological survey is required in the form of an Ecological Impact Assessment (EclA). Impact assessments are required for habitats, species, and existing trees on site including the impact of new artificial lighting. Submissions must include evidence of the application of the mitigation hierarchy of avoid, reduce, compensate for losses, and enhance. All developments should aim to avoid adverse impacts in the first instance, see the PKC Planning for Nature Guidance section 5.1. [Planning Guidance - Planning & Biodiversity - Perth & Kinross Council \(pkc.gov.uk\)](http://pkc.gov.uk)

NPF4 Policy 3 Biodiversity

b) Development proposals for national or major development will only

be supported where it can be demonstrated that:

iv. significant biodiversity enhancements are provided, in addition to any proposed mitigation. This should include nature networks, linking to and strengthening habitat connectivity within and beyond the development, secured within a reasonable timescale and with reasonable certainty. Management arrangements for their long-term retention and monitoring should be included, wherever appropriate.

Conclusions from the EclA and requirements detailed in the PKC Planning for Nature Supplementary Guidance should be used to create a Site Biodiversity Action Plan. It should contain quantity, locations, techniques, timescales, and monitoring arrangements. Submitting records of species found during survey to the NBN Gateway would be a positive contribution towards biodiversity and including this measure in the Site Biodiversity Action Plan is requested.

NPF4 Policy 6 Forestry, Woodland and Trees

b) Development proposals will not be supported where they will result in:

- i.** Any loss of ancient woodlands, ancient and veteran trees, or adverse impact on their ecological condition Adverse impacts on native woodlands, hedgerows and individual trees of high biodiversity value, or identified for protection in the Forestry and Woodland Strategy.

There are areas of ancient woodland located to the east and west of the proposed development site. NPF4 doesn't support development that will result in loss of ancient woodlands or adverse impact on their ecological condition. Trees and woodland should be included in the submitted survey information. Submissions must include a clear impact assessment of the proposed development on trees, woodland and hedgerows, and application of the mitigation hierarchy. Compensatory tree planting is required on a ratio of 1:3 for every tree lost, see PKC Planning for Nature Guidance Annex 1.

A checklist of information required to inform a planning application regarding biodiversity is provided in Annex 4 of the PKC Planning for Nature Supplementary Guidance. Applicants are encouraged to ensure information is submitted in accordance with the checklist to reduce future information requests and delays [Planning Guidance - Planning & Biodiversity - Perth &](http://pkc.gov.uk)

PKC Development Plan Team

Only the outline of the site has been provided with no further information on what the accompanying infrastructure might be. Advice is limited therefore to the principle of a ground mounted solar installation without battery storage or substation/grid infrastructure. Note that installations of 50MW or more are determined by the Energy Consents Unit.

The site is immediately adjacent to the north of the A9 south of Tibbermore with plantation woodland to the east and west and slopes gently down towards the north-east. The greenbelt runs along the south and east of the site.

Due to the size of the proposal and potential visibility from Methven, the A9, Tibbermore, and surrounding properties and historic features should be addressed in a Landscape and Visual Impact Assessment. This must include a cumulative assessment taking into account other proposals in the area. Note that while there is an overhead line through the site this should not be taken as an industrialisation of the Local Character Area given the main impact of the proposal is on the planar nature of the landscape rather than the vertical. Screening from the A9 will be essential. While not a permanent use, effects should be assessed as of long-term duration. Reference should be made to both Policy 11 and LDP2 Policy 39. Note there is a proposed local geodiversity site formed of the cutting wall of the A9 through this location. The proposal is unlikely to have any detrimental effect.

The site is entirely on 3.1 Prime Agricultural Land. NPF4 requires that sites are only supported where there is a specific locational need and no other suitable site AND there is secure provision for restoration AND the layout and design minimises the amount of protected land that is required. Each of these matters must be demonstrated in a proposal. The cumulative loss of Prime Agricultural Land must also be assessed and quantified, again as a long-term impact. This will be taken into account in the assessment of whether the impact is acceptable in accordance with NPF Policy 4(a). Associated battery energy storage (BESS) will be supported but must be taken into account in the assessments above. Any BESS plans must set out

Conclusion

Principle of the proposal is acceptable and supported by current LDP especially by Policy 33 and NPF4. Mitigation, in particular visual impact from public viewpoints will be required. Further investigation on scope of required studies mentioned above is also recommended

PLANS AND DOCUMENTS REQUIRED WITH PLANNING APPLICATION SUBMISSION

- Site Location Plan
- Site Layout Plan

- Cross Section Plans
- Finished Levels Plan
- Elevation Plans
- 3D Visualisations including from selected Viewpoints
- Landscape and Screening Plan
- Grid Connection Plan
- Phase 1 Habitat Survey including Protected Species Survey
- Tree Survey if any trees within site that are proposed to be felled
- Transport Assessment/Statement including Construction Traffic Management Plan (CTMP)
- Flood Risk Assessment
- Landscape and Visual Impact Assessment
- Cultural Heritage Assessment – Archaeology
- Construction Environment Management Plan (CEMP)
- Noise Assessment/Data
- Glint and Glare Assessment
- Supporting Planning Statement
- Design & Access Statement

For information on what you will need to submit with your application please see our [application checklists](#) which can be found on our website at www.pkc.gov.uk/planning . The document [Additional Supporting Information Guidance](#) identifies the circumstances where further information will be required to allow us and consultees to fully consider your planning application. Failure to provide this information at the time of submission may delay the consideration of your application. You should also submit photographs of the site with your application as this may speed up the assessment.

PLEASE NOTE THAT THIS RESPONSE IS THE CONSIDERED OPINION OF A PLANNING OFFICER. NO FURTHER DISCUSSION WILL BE ENTERED INTO AS TO HOW THE POLICIES ARE INTERPRETED OR APPLIED.