

# **SUMMARY OF RESPONSES TO THE CALL FOR SITES AND ISSUES CONSULTATION**

**Note: The sites contained within this appendix were submitted to the Council as part of the Call for Issues and Sites Consultation and have not been given any support from the Council.**

## PERTH HMA

**Aberargie** - New proposals submitted for: a large 12 hectare proposal (Aberargie 1) for mixed use residential, retail, commercial and community development at Nether-ton Farm; and a 1 hectare proposal for residential development south of Ayton Farm (Aberargie 2). A proposal previously considered through the LDP process but not supported for 2.3 hectares of residential development east of Ayton Farm is proposed again (Aberargie 3).



**Abernethy** - Abernethy District Community Council believes that there are infrastructure shortfalls as a result of substantial development in recent years and that in keeping with TAYplan only infill development, open space and employment land should be supported in the LDP. Submission of a new proposal for residential development on 0.7 hectare site (Abernethy 2).

Three proposals previously considered through the LDP process are proposed again as follows: a 2.8 hectares for residential development which was in the Proposed Plan but was removed by the Reporter (Abernethy 1); a large 18 hectare proposal not supported in the LDP (Abernethy 3); and a large 14 hectare residential site also not supported in the LDP (Abernethy 4).





## Almondbank, Pitcaringreen and Cromwell Park summary

Proposal for a change of use from employment to housing on both parts of the allocated site E6 (Almondbank 1) due to inability to find a suitable industrial user. Proposed again is a 1.1 hectare site east of Bridgeton Farm (Pitcaringreen 1) for residential growth which was supported by the Council but the Reporter did not agree.

### Almondbank



### Pitcaringreen



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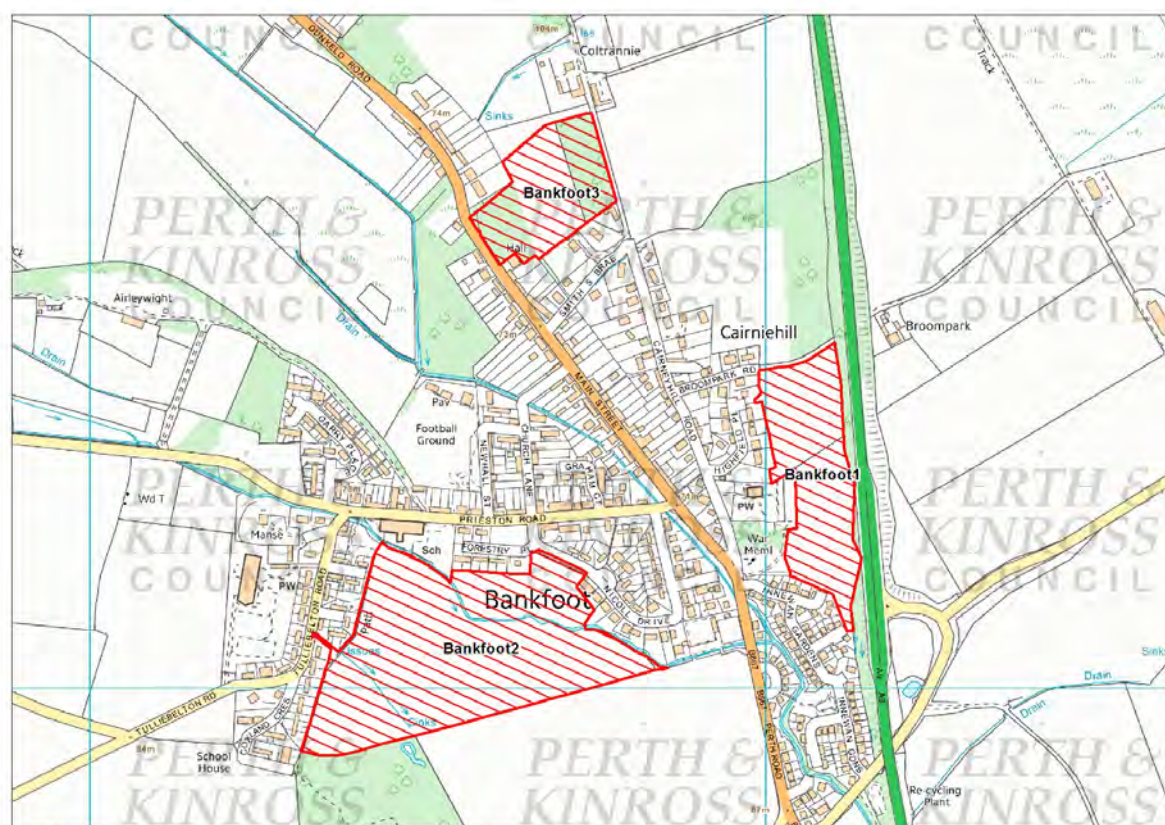


**Balbeggie** – Two new sites proposed for residential development: a 4.3ha site to the north between Burnside Road and Pitskelly House (Balbeggie 1), and the other a 6ha site to the East between the A94 and the B953 (Balbeggie 2).



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**Bankfoot** – Three new sites proposed for residential development. The first is for 30 houses off Dunkeld Road (Bankfoot 3). Part of the site is within the settlement boundary and has In Principle consent; the remainder is outwith the boundary. The second is a 3.6ha site at Highfield Place / Church Field (Bankfoot 1). The third is a 9ha site to the south of Bankfoot (Bankfoot 2) for residential and public open space. It is suggested that the development of this site would help put in place a sustainable solution to flood risk at the south of the village.

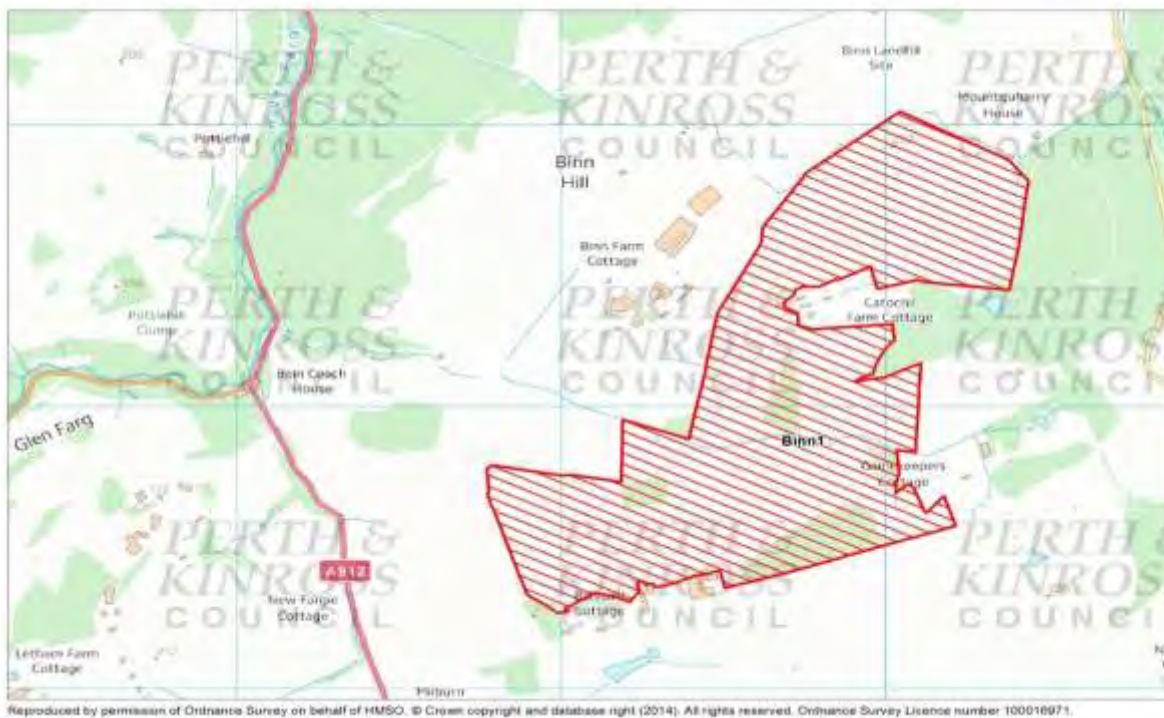


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## Binn summary

Proposal seeking support for site to be expanded from 84 hectares to 209 hectares for an Eco Innovation Park including waste management and recycling and an environmental education and training centre (Binn1). Abernethy & District Community Council seek progression of a masterplan to guide development here.



## Bridge of Earn summary

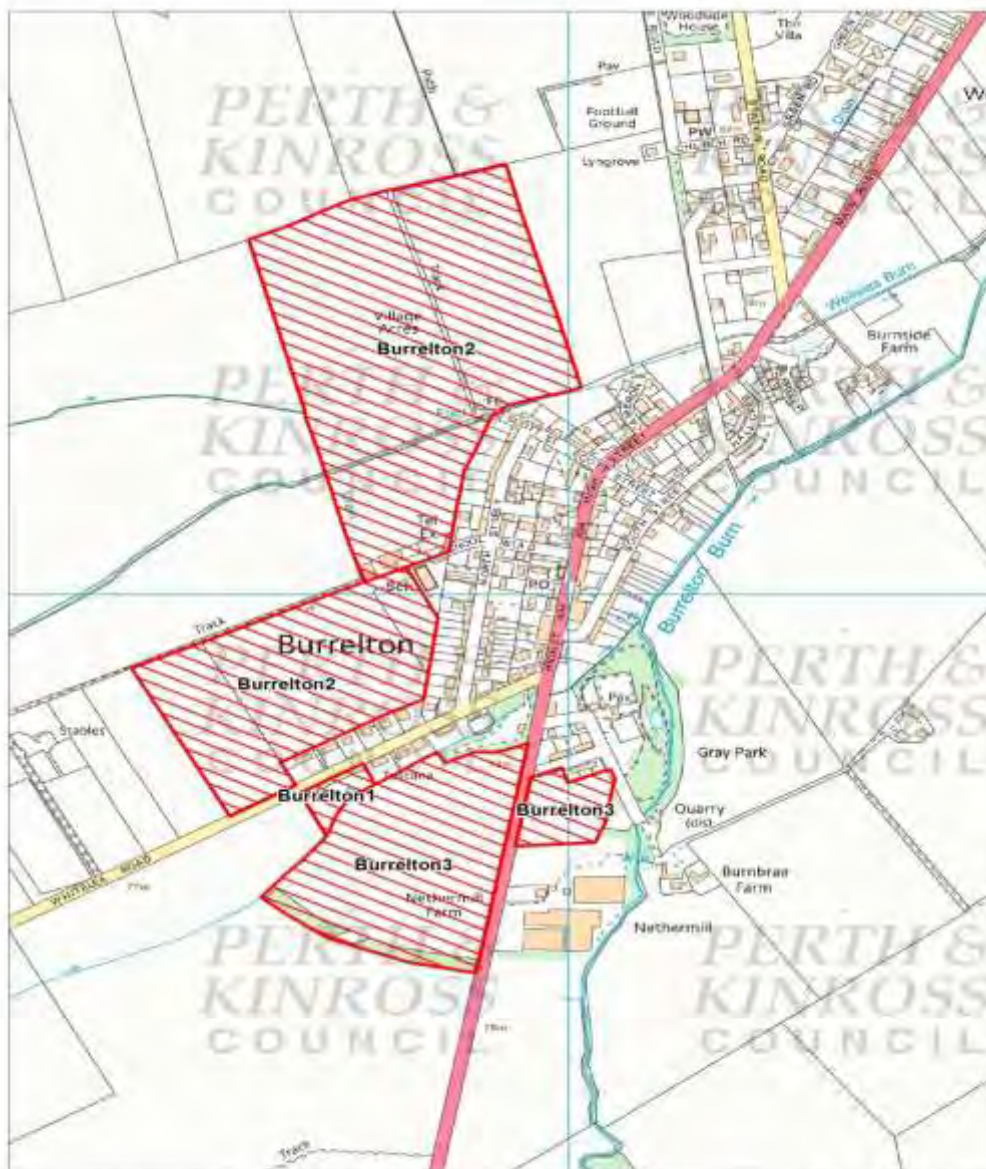
2 previously considered and not supported proposals submitted (Bridge of Earn1) for neighbouring sites of combined 2.2 hectares comprising of amenity land within the grounds of A listed building Kilgraston School proposed for residential development.



**Burrelton** – Resubmission of the site at Whitlea Road (Burrelton 2 – south) for 80 houses and community woodland which was previously included in the Proposed LDP but was deleted by the Reporter. It is also suggested that there is potential for an extension to the primary school in conjunction with a new community hall. The site is largely within the settlement boundary. A site is also proposed for inclusion within the settlement boundary and zoned for housing or commercial use to the south of Whitlea Road (Burrelton 1). This site was unallocated in the Proposed LDP but was included within the settlement boundary but again the Reporter excluded it.

Two new sites are also proposed. One proposed as a longer term extension to the north of Whitlea Road for mixed use possibly including small scale employment (Burrelton 2 – north). The second is a site at Nethermill Farm for housing and community facilities in two phases east and west of the A94 (Burrelton 3). There is also scope for locating a new village hall within the first phase.

A further comment was made that there should be no further windfarm development with a visual impact from the A94 and from Perth to Scone.



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## Clathymore summary

Submission of previously considered proposal for large 8.8 hectare residential development (Clathymore1) which the reporter removed from the LDP.



## Cottown

Two new sites proposed for residential use. The first is a proposed extension to the settlement boundary to the south to include a strip adjacent to the existing boundary for housing and / or to provide road access to the site to the south (Cottown 1). The second is a 1ha site to the south which is proposed as an alternative to the site currently within the settlement boundary to the west (Cottown 2).



**Dunning** - Submission of previously considered proposals: 2.1 hectare residential development (Dunning2); and 1.5 hectare residential development proposing an extra 22 homes to deliver infrastructure and make wider proposal with H20 viable (Dunning1).



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**Errol** – Proposal for 2 new residential sites and a mixed use site. First residential site at Inchoonans Farm (Errol 1) on rural brownfield land (potentially steading conversion?) and the second is for a larger site to the north east of Errol settlement (Errol 2). The proposed mixed use site is at East Inchmichael (Errol 3). Comments were also received focusing on an undeveloped site bound by Preston Watson Street, an extension to the primary school and the LDP should ensure the public park is reserved for community use. There is a request for a village planning exercise to inform regeneration and enhance conservation within the village. The LDP should also state the sustainable travel options Errol has to offer for travel between Perth and Dundee.

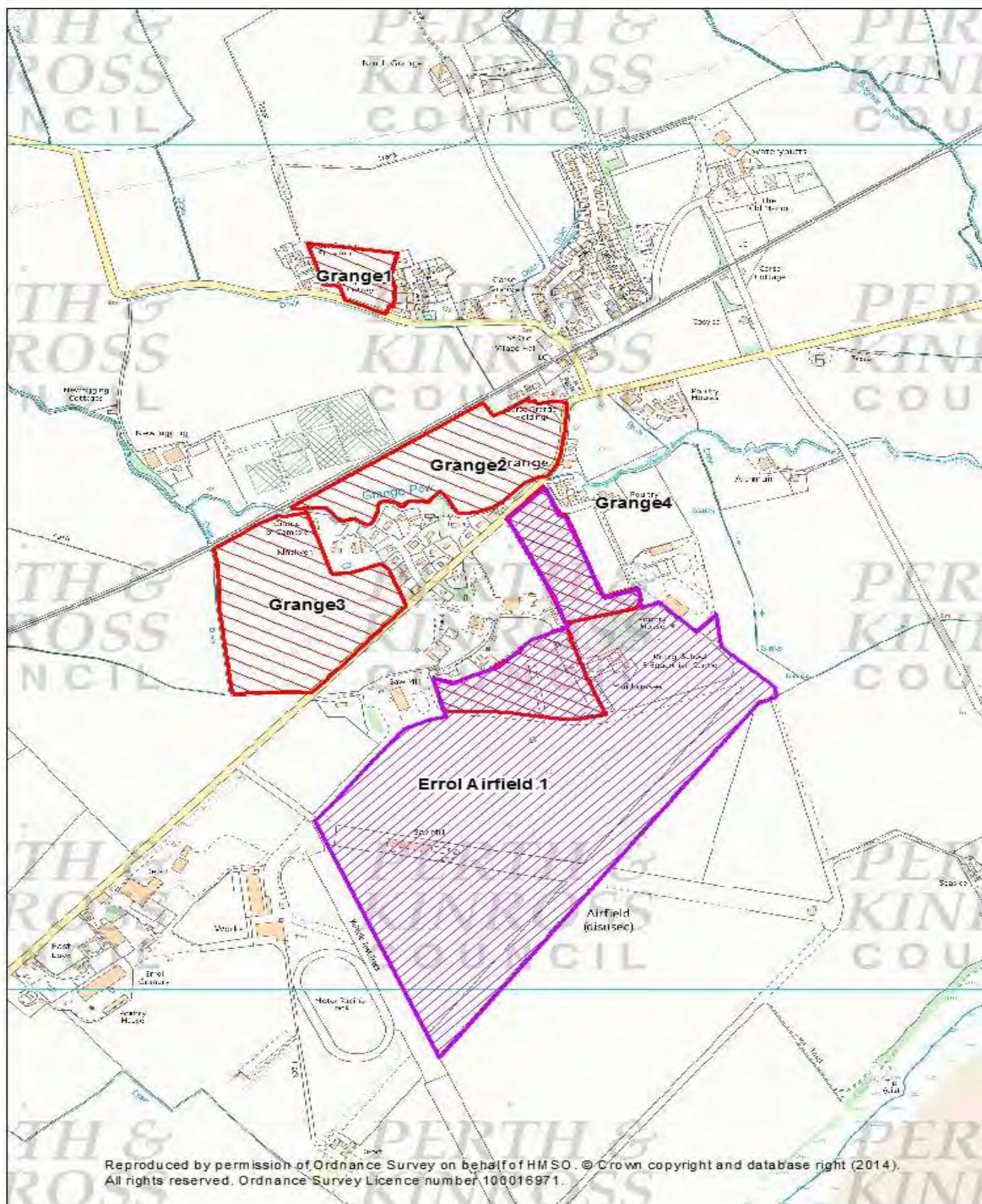


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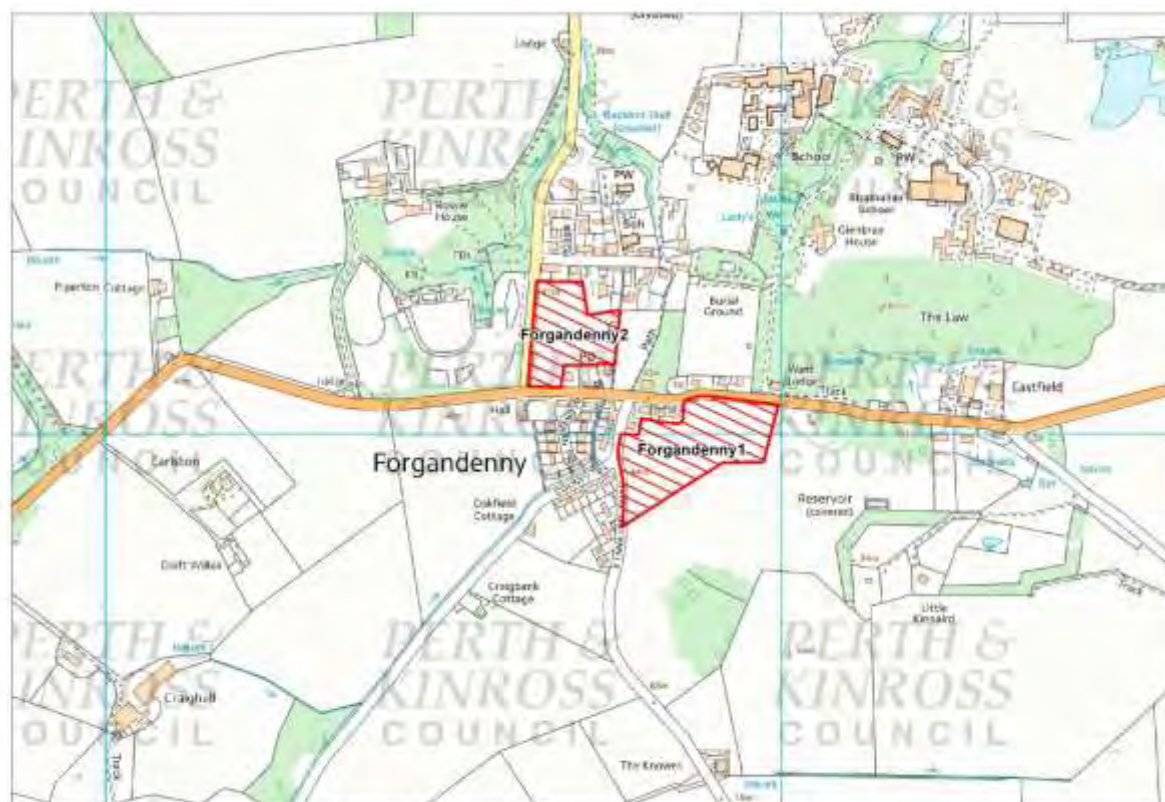
**Errol Airfield / Grange** – Four new sites proposed in Grange. Residential site to the north of the site (Grange 1) providing infill development. Grange 2 and 3 are larger residential proposals which would possibly enable improved community facilities through the development of these sites. Grange 4 is proposed as a mixed use site where part of the site is already zoned as employment – there is demand for more industrial units in the area.

Mixed use proposal and extension to the settlement boundary at Errol Airfield/ Grange (Errol Airfield 1) to include land at Muirhouses Farm. Part of the site is already designated however this should be extended to enable development.



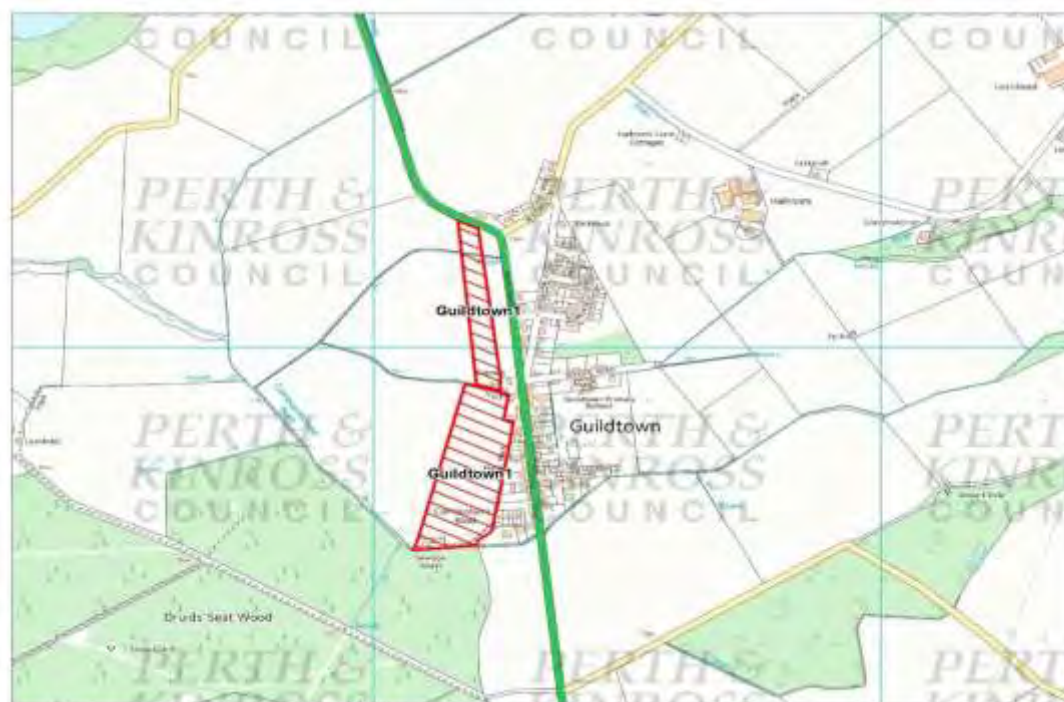


**Forgandenny** - Submission of proposals previously considered: 1.5 hectare low density 12-14 homes development (Forgandenny 2) within Forgandenny conservation area on an open space allocation; and a 2.4 hectare low density 20-25 homes development (Forgandenny 1).



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**Guildtown** – A new 5ha site proposed to the south west (Guildtown 1) within an extended settlement boundary for residential use. It is suggested that there is the potential for Guildtown to form the basis of a longer term expansion in light of the Cross Tay Link Road. It is further proposed that the settlement boundary to the north west be extended to provide a larger deeper site within the boundary which would allow for more growth.



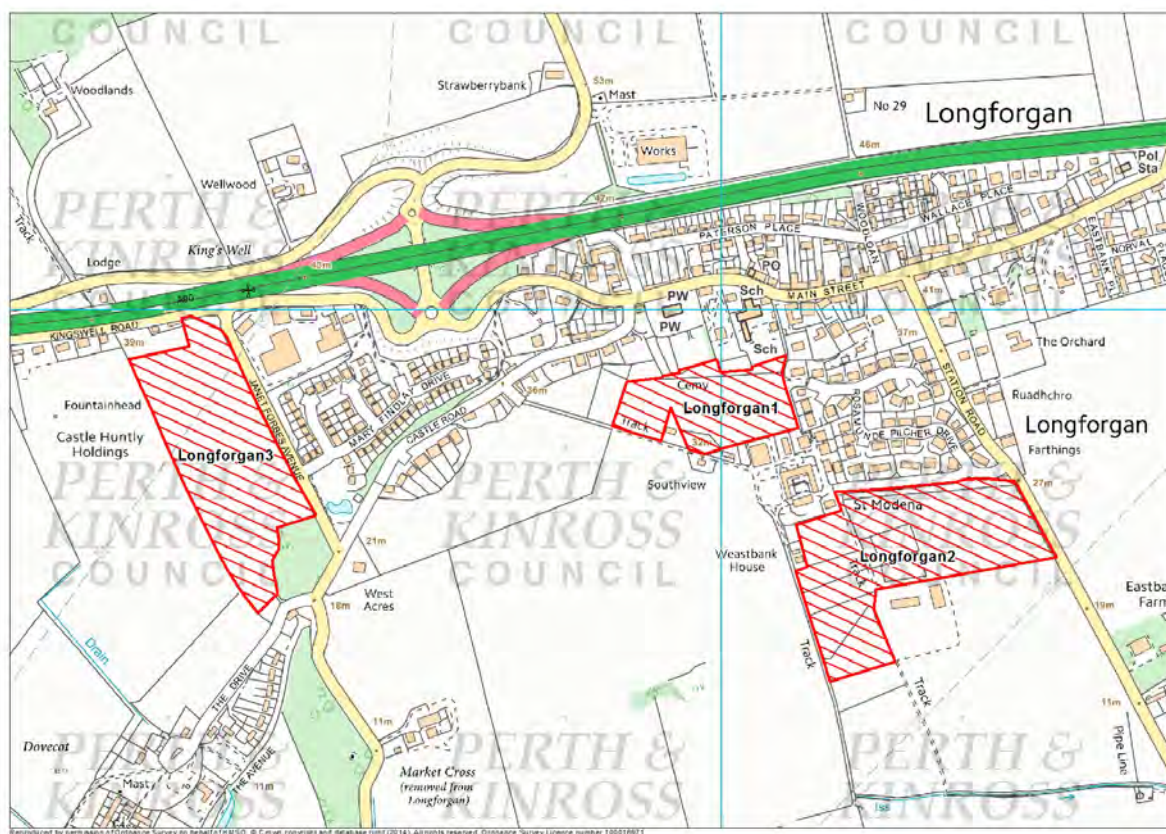
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**Inchtute** – Residential site put forward by same agent, can either be considered as a whole (Inchtute 1 & 2) or as a single site (Inchtute 2). This site was previously put forward. A comment received stating that any further development would be detrimental to the character to the village and be against TAYplan. Consideration should be given to flooding within the area before further development.

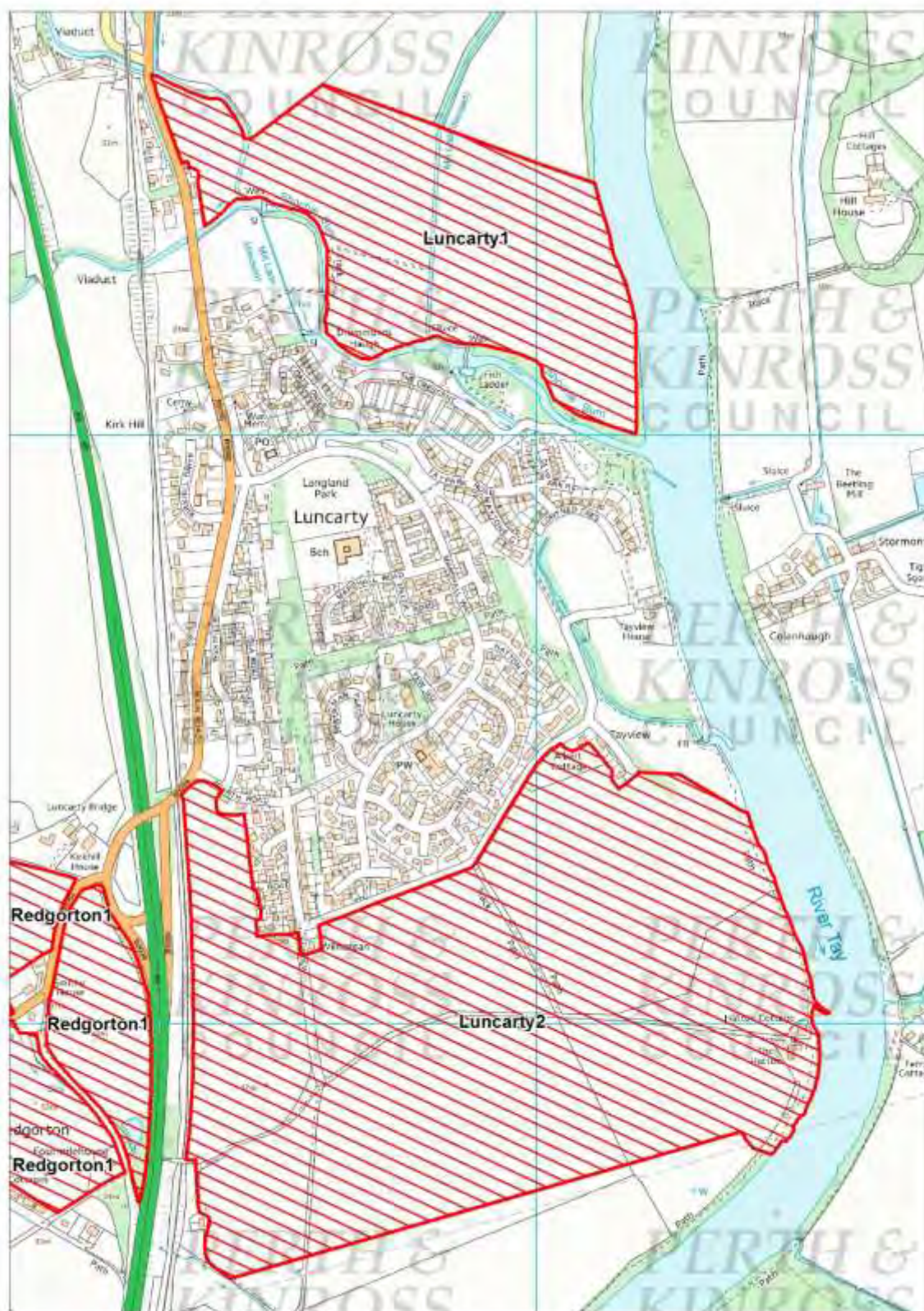


**Longforgan** – Resubmission of both sites (Longforgan 1 & 2) which were included in the Proposed LDP but deleted by the Reporter due to a concern that they would prejudice the delivery of Dundee Western Gateway. It is argued that TAYplan is being reviewed to allow limited development within the Perth & Kinross Part of the Greater Dundee Housing Market Area and these sites are well placed to meet this identified need. A new site is also proposed to the West of Janet Forbes Avenue for 80 houses.





**Luncarty** – A new 23.7ha site is proposed to the North between the River Tay and the B9099 (Luncarty 1). A further submission requests recognition that site H27 Luncarty South (Luncarty 2) could accommodate in excess of 300 houses.

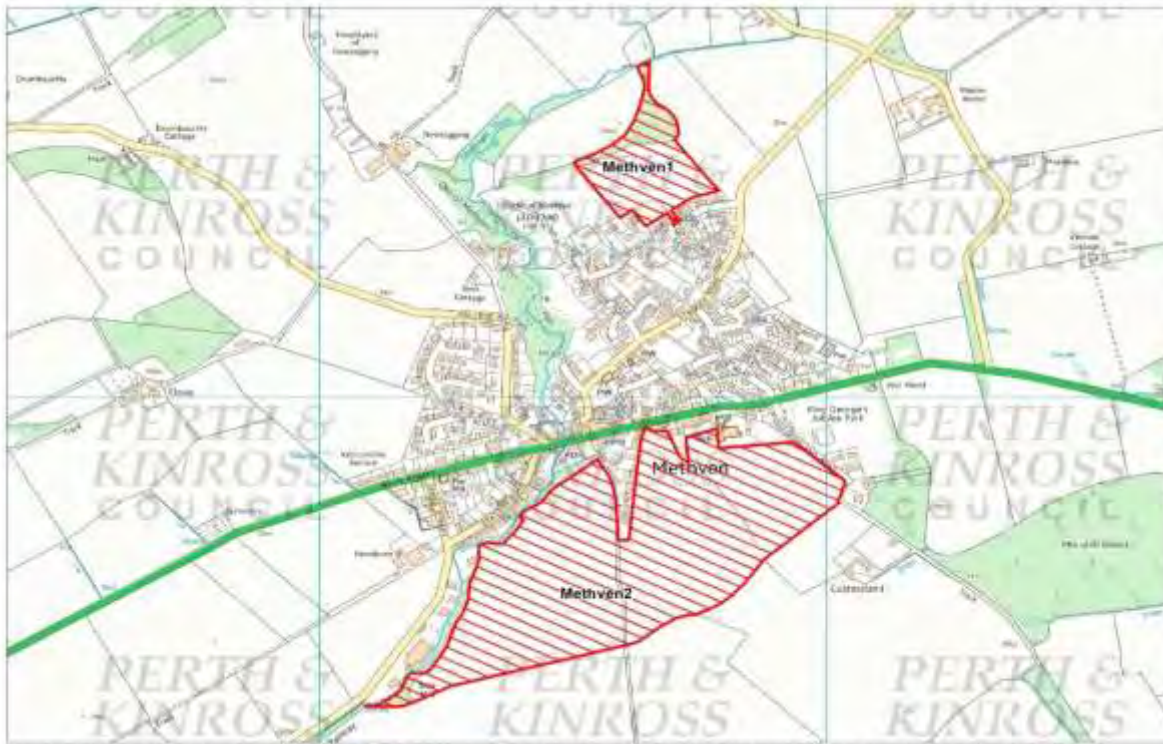


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**Methven** - New proposal for 2.9 hectares of residential development and community woodland linking to existing woodland (and wider access networks) to north of Methven (Methven1).

Proposal previously considered for large 23.5 hectare approximately 400 homes mixed use development (Methven2).



## Perth

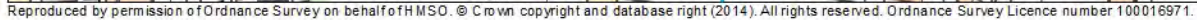
Methven and District Community Council request a re-examination of the scale and timing of new residential developments, seek a phased programme of land releases compatible with realistic building programmes and infrastructure provision, and that Perth West should be supported and Almond Valley refused. If development does go ahead the recreational value/landscape/lade/ and industrial heritage of Almond Valley Village require special attention as do the future needs of the existing places adjoining the site.

New proposals are submitted as follows: 1.3 hectares of currently designated open space north of Burghmuir reservoir (Perth 4 ) as residential development; 0.9 hectares at Mount Tabor Road (Perth 8) also currently designated open space for residential development; for the former auction mart site (Perth 18) as a mixed residential/commercial development accommodating 200 homes and 45,000 sq ft retail/commercial floorspace; and 0.6 hectare residential development south of Huntingtower house (Perth 9) on land currently outwith the settlement boundary (75% of this field will be used to facilitate new roads infrastructure and this proposal is for the remainder of this field); 1.5 hectare residential development on land north of Huntingtower House and south of the Mill Lade (Perth 17); and a small scale around 4 home proposal at Rhynd Road (Perth 5); and for an 8.2 hectare extension to the north of Berthapark H7 (Perth 6) within the green belt for employment uses for a potential Park and Ride taking account of any standoff zone for the overhead pylons.

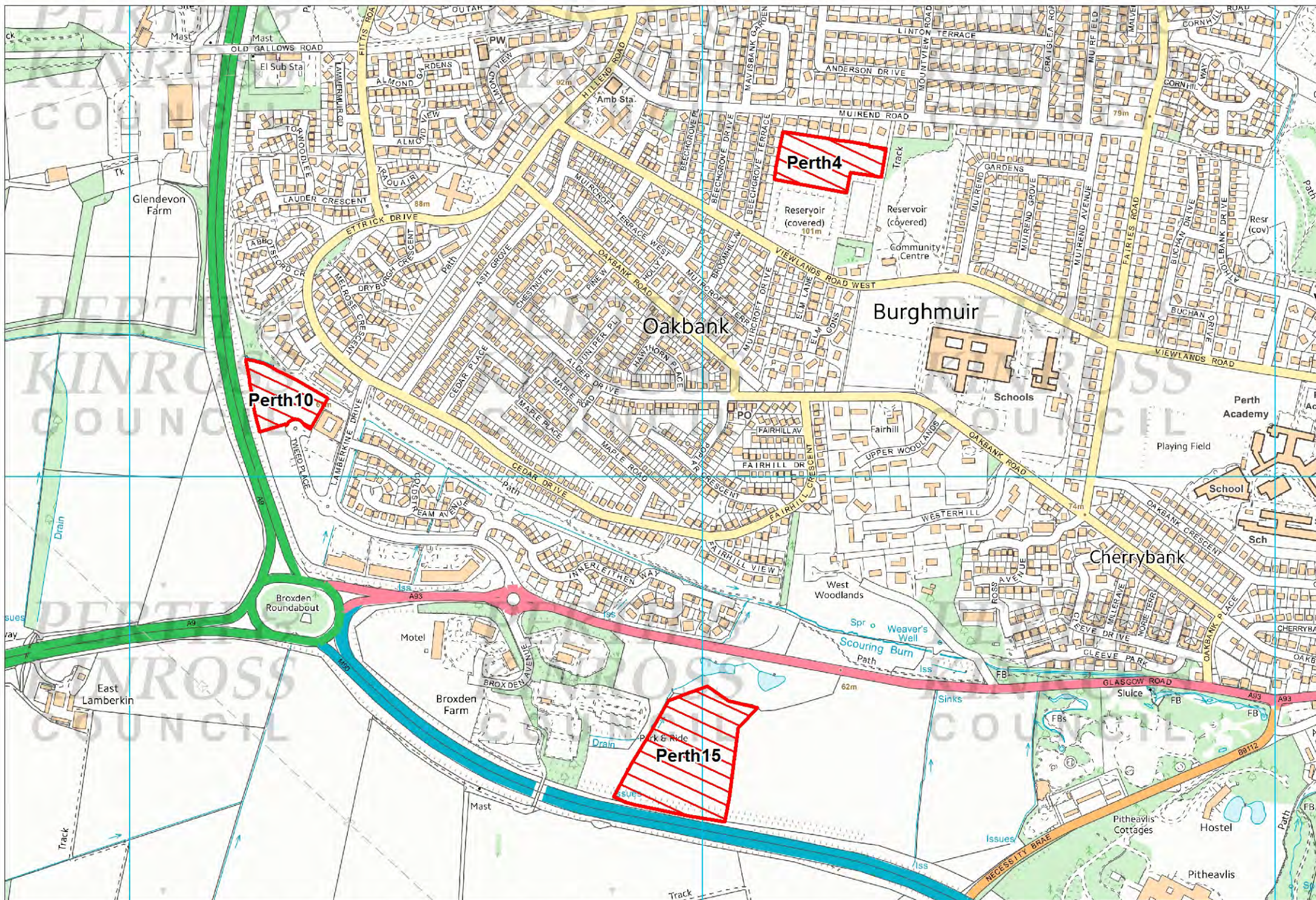
Proposals for sites in the current Local Development Plan as follows: land at Newton Farm H71 (Perth 3) proposed for mixed use residential and retail (food store) referencing the Perth and Kinross Retail Study and City and Town Centre Review 2014 which they believe to show further capacity for convenience floor space; proposal at MU1 and employment allocation to its west (Perth 15) for reallocation of 7 acres gross from employment to residential use for 50 homes citing its lack of roadside visibility and the ability to better integrate residential homes than pavilion style offices within the landscape; proposal for land at Broxden to be continued as an allocation for employment but for this to support classes 2 and 4 (Perth 10); maintain existing 1,500 home allocation for Almond Valley Village (Perth 12); proposal for reallocation of land to the west of the new link road within E38 to residential as part of the Almond Valley Village H73 to support a further 120 homes (Perth 1); to maintain existing 0.5 hectare employment allocation at Inveralmond (Perth 13); for designation of half a hectare site within the commercial centre at Crieff Road as a town and neighbourhood centre to allow this site to provide for local shopping facilities and services (Perth 14); Perth West H70 supporting the current H70 allocation for housing led mixed use development (Perth 2); and on behalf of Muirs Group supporting a wider site at Perth West which includes land within the settlement boundary (proposed boundary TBC).

Proposals that were previously considered and resisted in the current Local Development Plan as follows: proposal for reallocation of employment land at the Ice Factory on Shore Road as residential (Perth 19); 4 hectares of land at Corsiehill (Perth 16) proposed for housing; 21 hectares of land at Friarton Quarry (Perth 11) proposed as mixed use residential, care village, and leisure uses development; John Dewar Lamberkin Trust propose that land west of the current settlement boundary within the green belt (Perth 7) should be as part of a larger Perth West development site which involves a new replacement A9 junction south west of Broxden (potentially providing a location for a future western bypass) and a new robust long term outer green belt boundary.

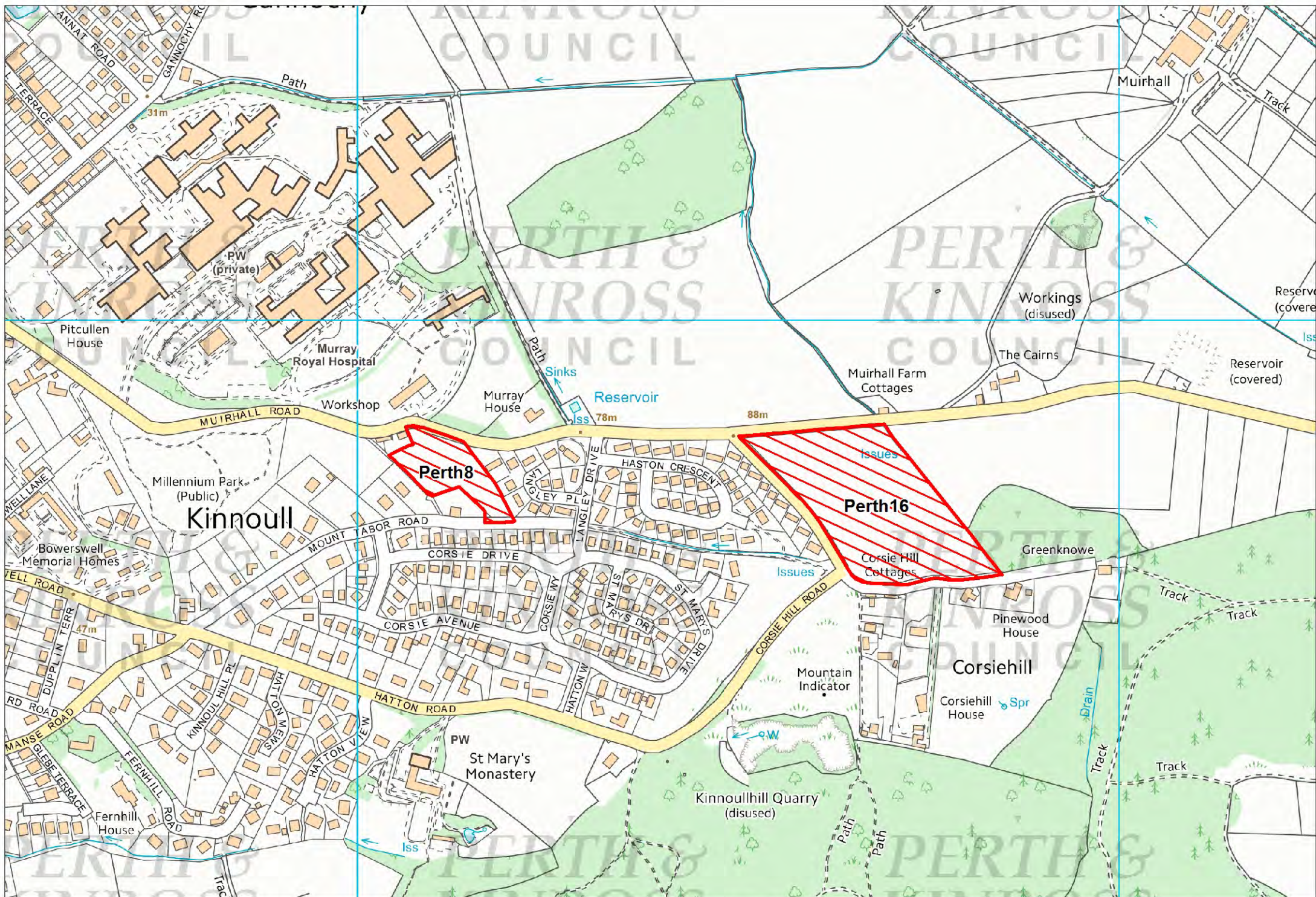




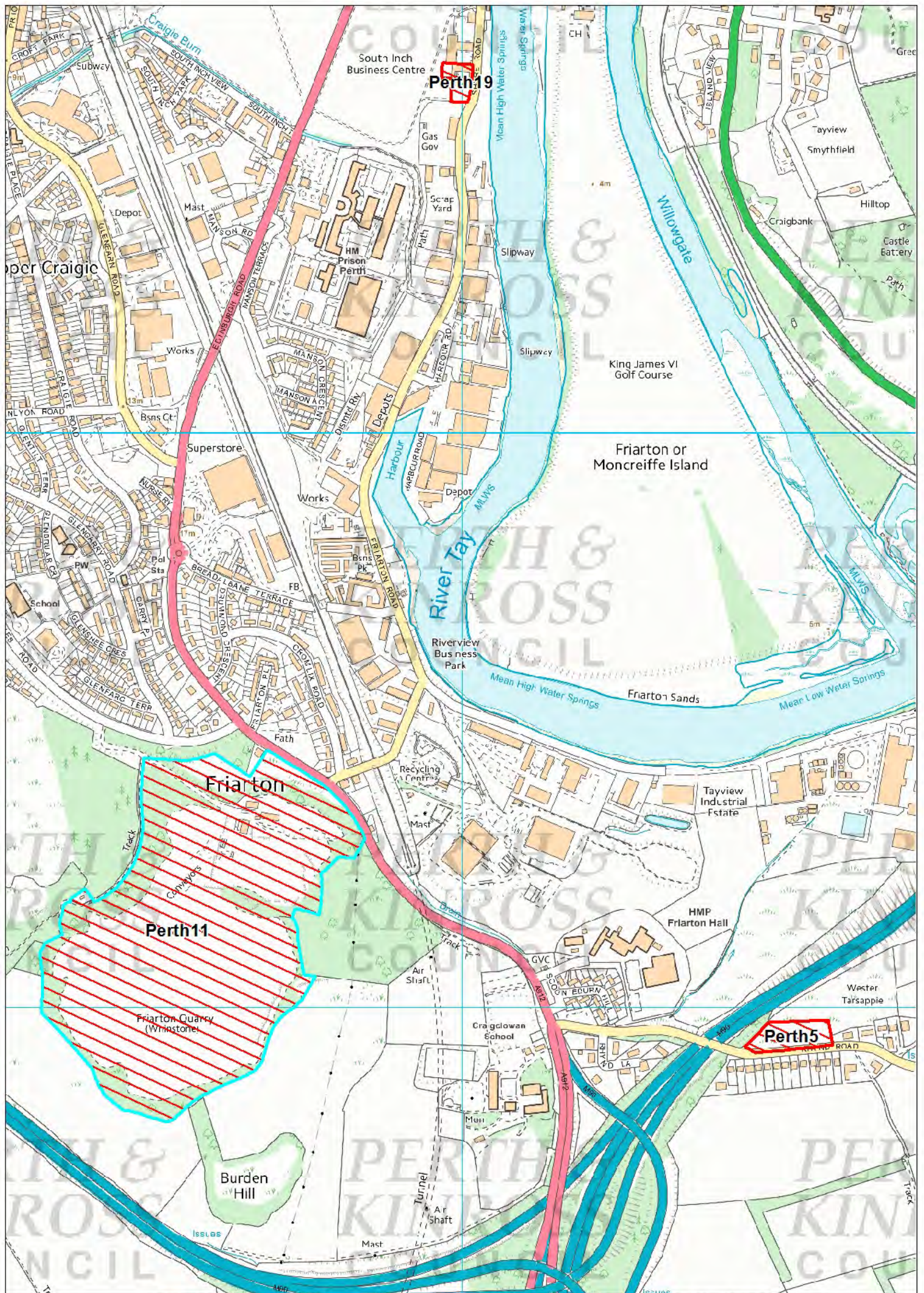




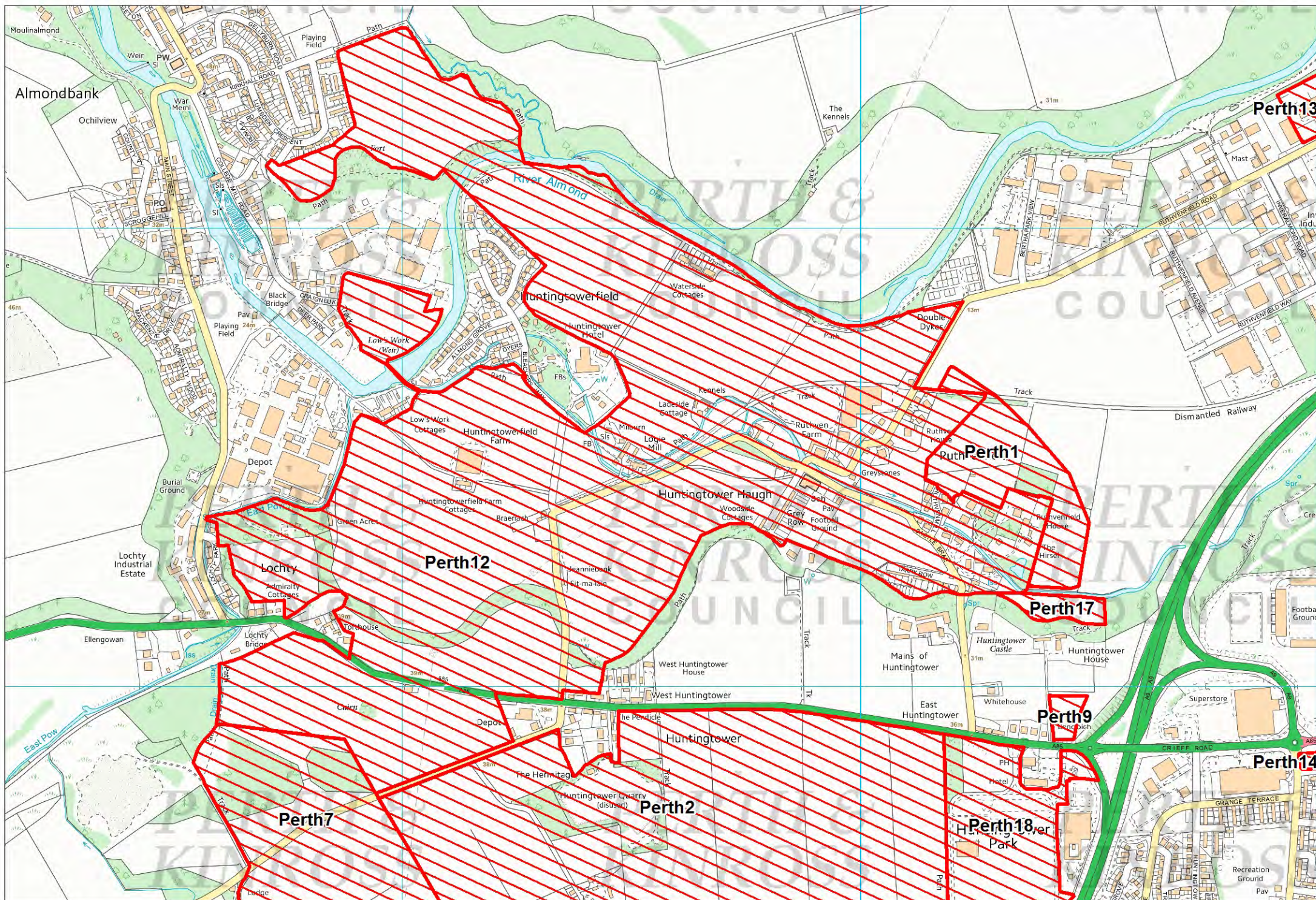




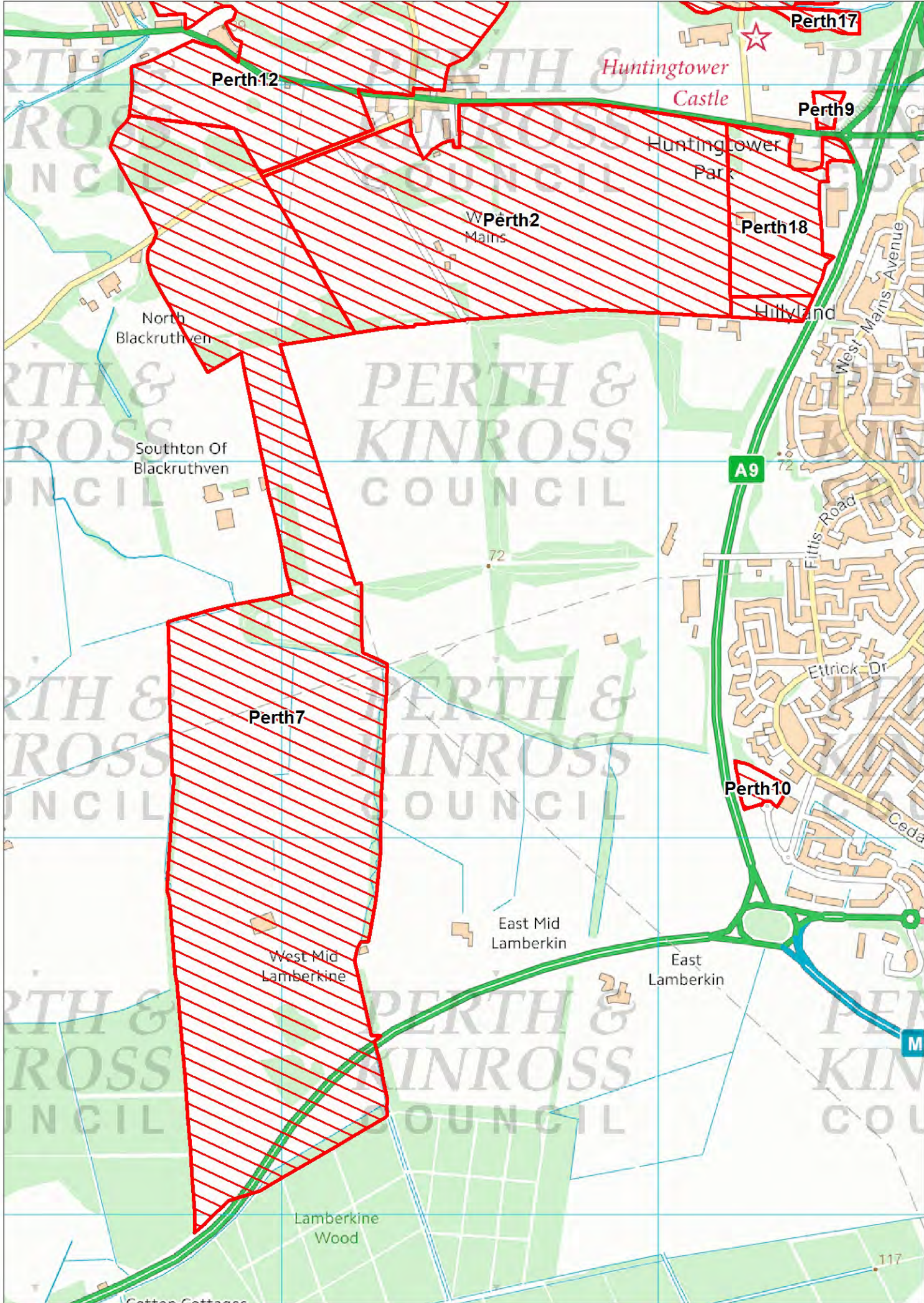












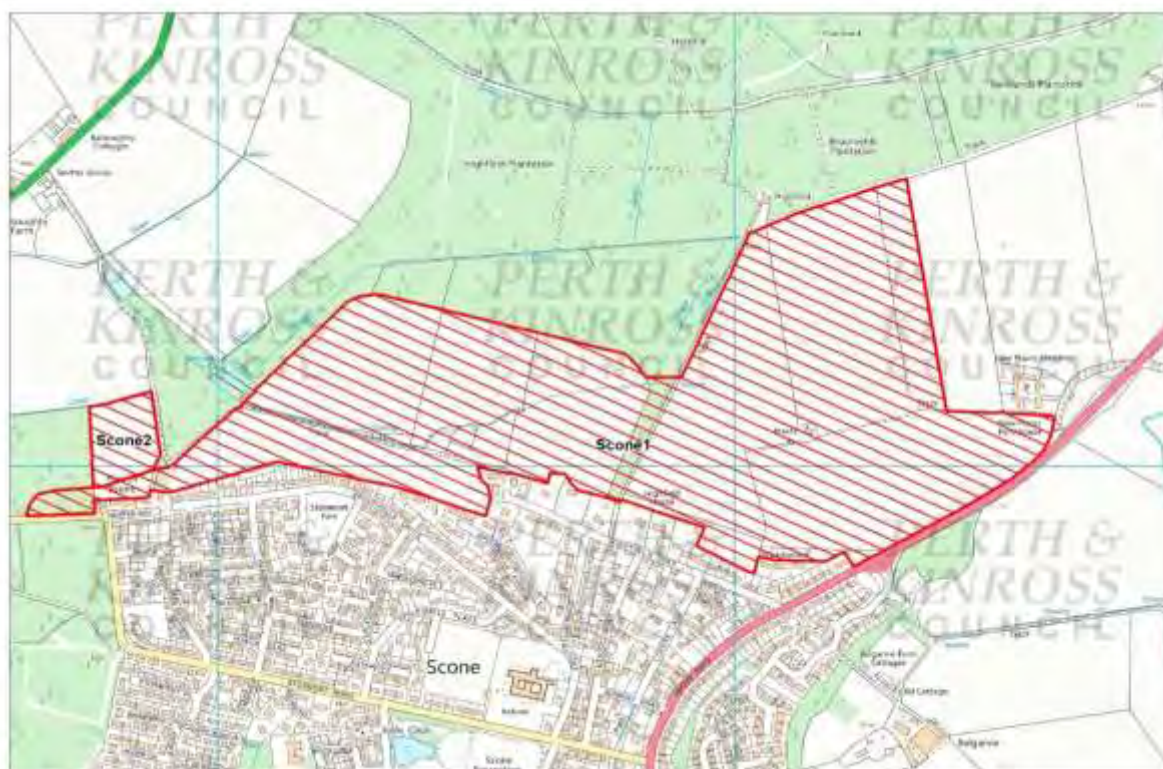


**Rait** – Two new sites proposed for residential use, one to the south (Rait 1), and one infill site to the East of Flawcraigs Farm (Rait 2). A further submission welcomes the designation as a conservation area but considers that an up to date assessment of the area is needed.



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**Scone** – New residential proposal to the west of current designation H29 (Scone 2). Comments received to increase the current density for Scone North H29 (Scone 1) as the site is capable of accommodating 1000 units (currently designated for 700 units). Request to remove greenbelt designation at a site to the east of Balcraig Farm to allow previously granted consent to be reinstated. Request to remove part of the greenbelt at land to the west of H29 to use as access (previously considered and dismissed by Reporter). Comment received on the need to develop a strategic plan for the long term development of Scone and building to the east is not the best solution.



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**St Madoes** – Proposal for residential site east of Pitfour Castle (St Madoes1). Site previously considered and reached finalised Local Plan stage although removed due to Historic Scotland concerns. Site has been revised to reflect HS comments. Not directly adjacent to settlement boundary.



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**Stanley** – Proposed extension to H31 (Stanley1), currently designated as indicative landscaping.

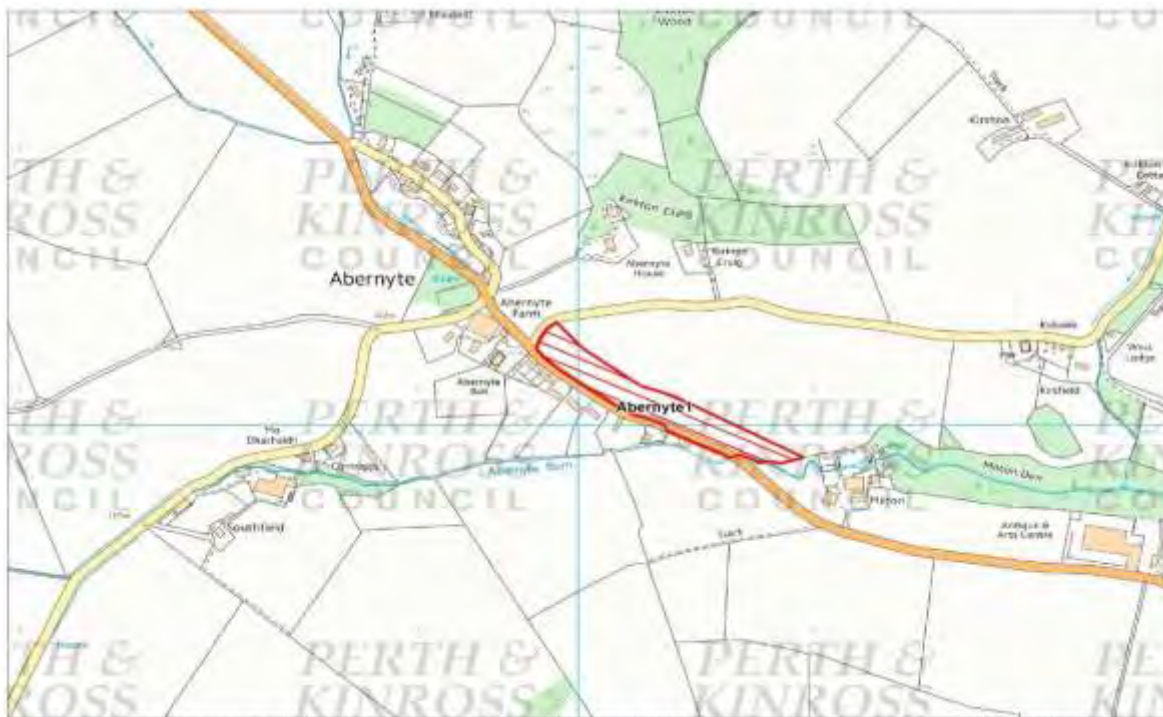


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**Perth Landward Area** - The following proposals / comments have been put forward for specific settlements / areas within the landward area:

**Abernyte** – Specific comments made on a number of the previous site assessments. A new site proposed at Milton Farm, East of Abernyte (Abernyte1) for residential development; any future settlement boundary for Abernyte should include this site.



**Airntully** – Two submissions requesting that a settlement boundary be identified incorporating two new sites for residential expansion; one to the South (Airntully 1) and one to the North (Airntully 2).





**Balboughty Steading** – Proposal for housing (Balboughty 1) including conversion of listed buildings and new development on surrounding brownfield land together with amendment to the Green Belt boundary previously considered through the LDP inquiry. PKC supported boundary amendment but Reporter did not agree. The same submission seeks an amendment to the Green Belt boundary to allow the development of the brownfield land at this site for residential use.



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**Ballindean** – Three new sites proposed to the South-east for residential development (Ballindean 1). A further submission seeks rigorous enforcement of policy RD3 around Ballindean or, if a settlement boundary is identified this should be tightly drawn allowing limited scope for further development. Specific comments made on previous site assessments. This same submission requests that consideration is given to designating Ballindean with conservation status.



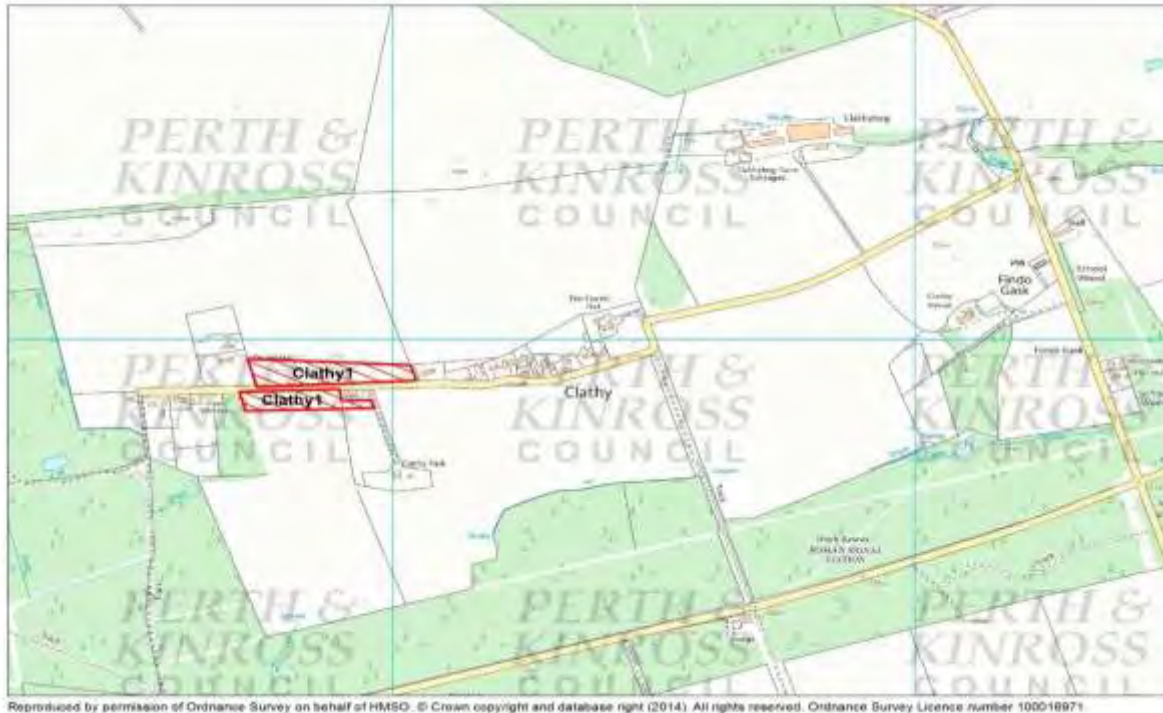
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**Bandirran** – Concern regarding windfarm application as this would have a significant adverse impact on landscape character.

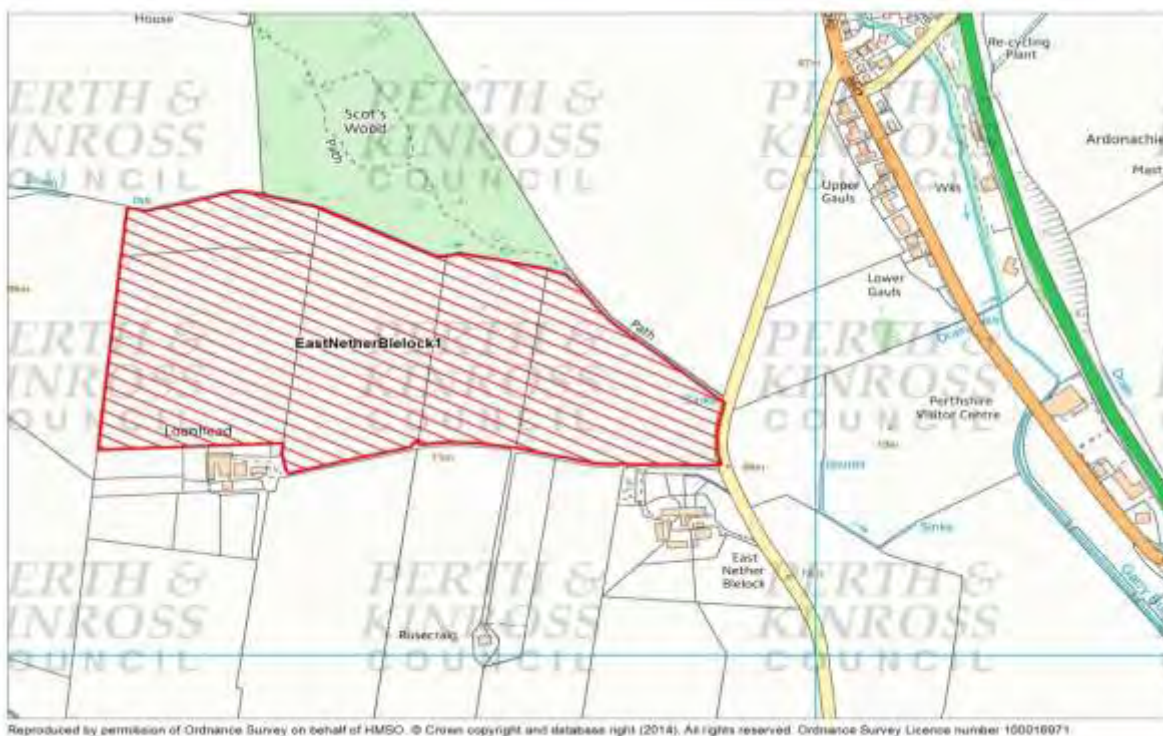
No map needed



**Clathy** - A site of around 2 ha (Clathy 1) to the north and south of the road through the village, this split site was previously considered at MIR but not included in the Proposed LDP.



**Easter Nether Blelock** – New site proposed for residential development (Easter Nether Blelock1).

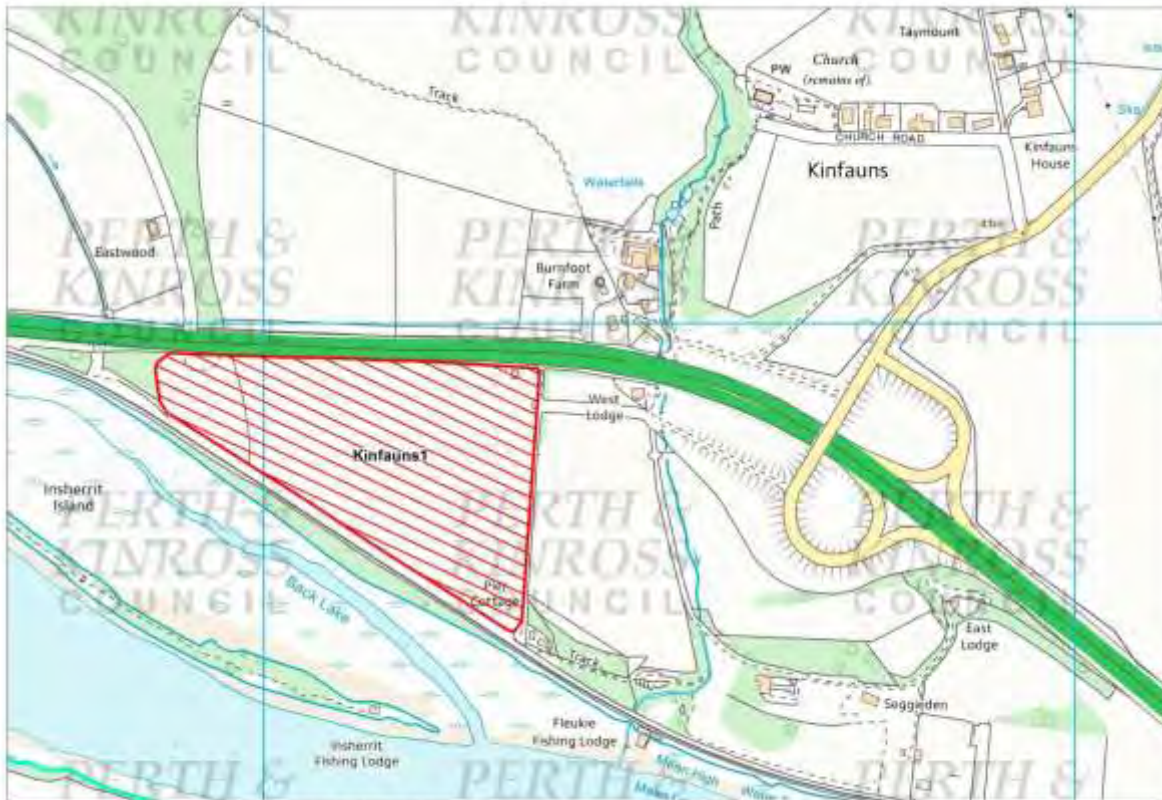


**Flawcraig** – Support for the previous MIR site assessments for sites in Flawcraig as development of these would not comply with policy RD3.

No map submitted



**Kinfauns** – New site proposed south of Burnfoot (Kinfauns 1) for 5 start hotel. Site is within Green Belt but has planning consent and so should be an LDP allocation.



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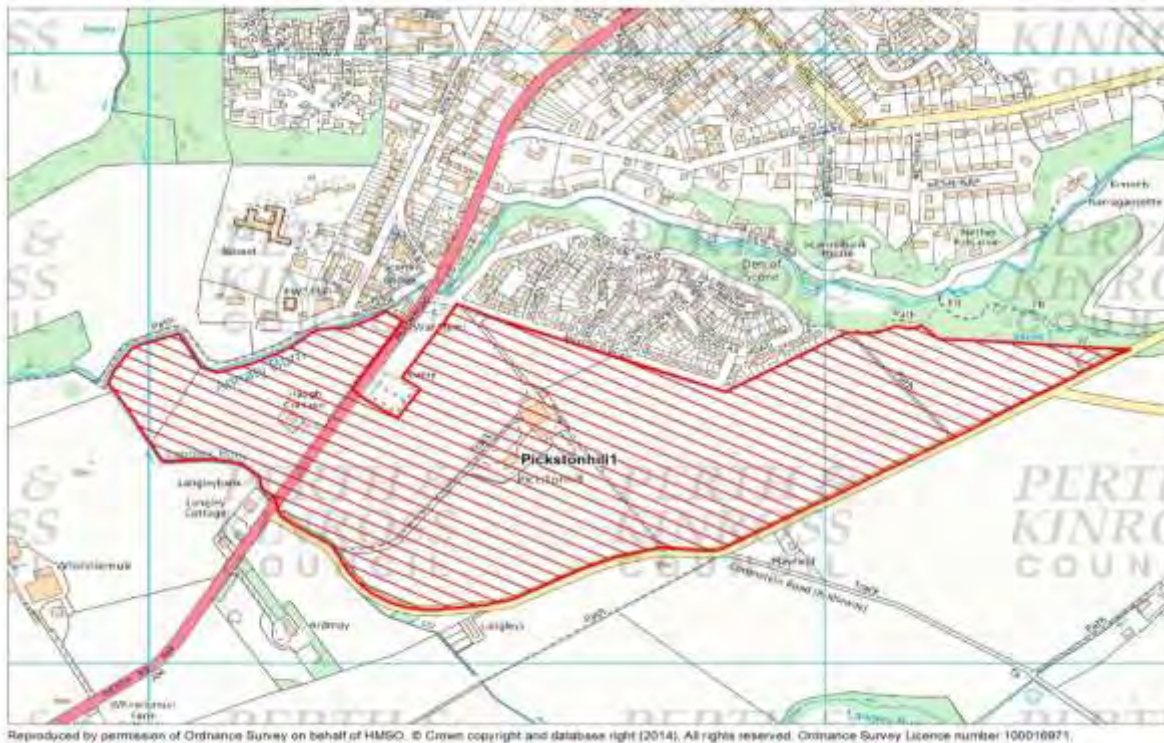
**Newbigging** – A settlement boundary should be identified. Three new sites proposed for residential development (Newbigging 1) which would provide infill opportunities within the proposed settlement boundary.



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**Pickstonhill** – Site proposed for housing (Pickstonhill 1) together with amendment to the Green Belt boundary previously considered through the LDP inquiry. PKC supported boundary amendment but Reporter did not agree. The same submission requests the that the Green Belt boundary be amended in this area to allow for the creation of a better settlement edge to the South

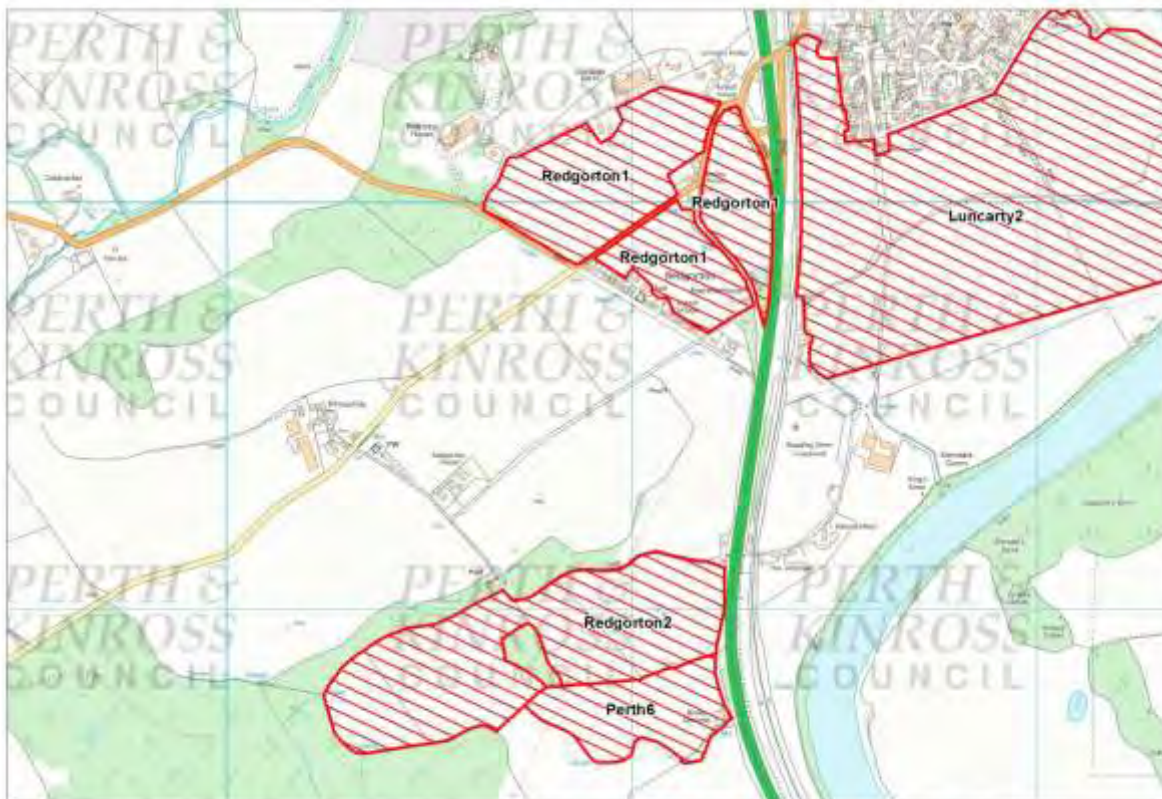


**Rait** – Two new sites proposed for residential use, one to the south (Rait 1), and one infill site to the East of Flawcraigs Farm (Rait 2). A further submission welcomes the designation as a conservation area but considers that an up to date assessment of the area is needed.



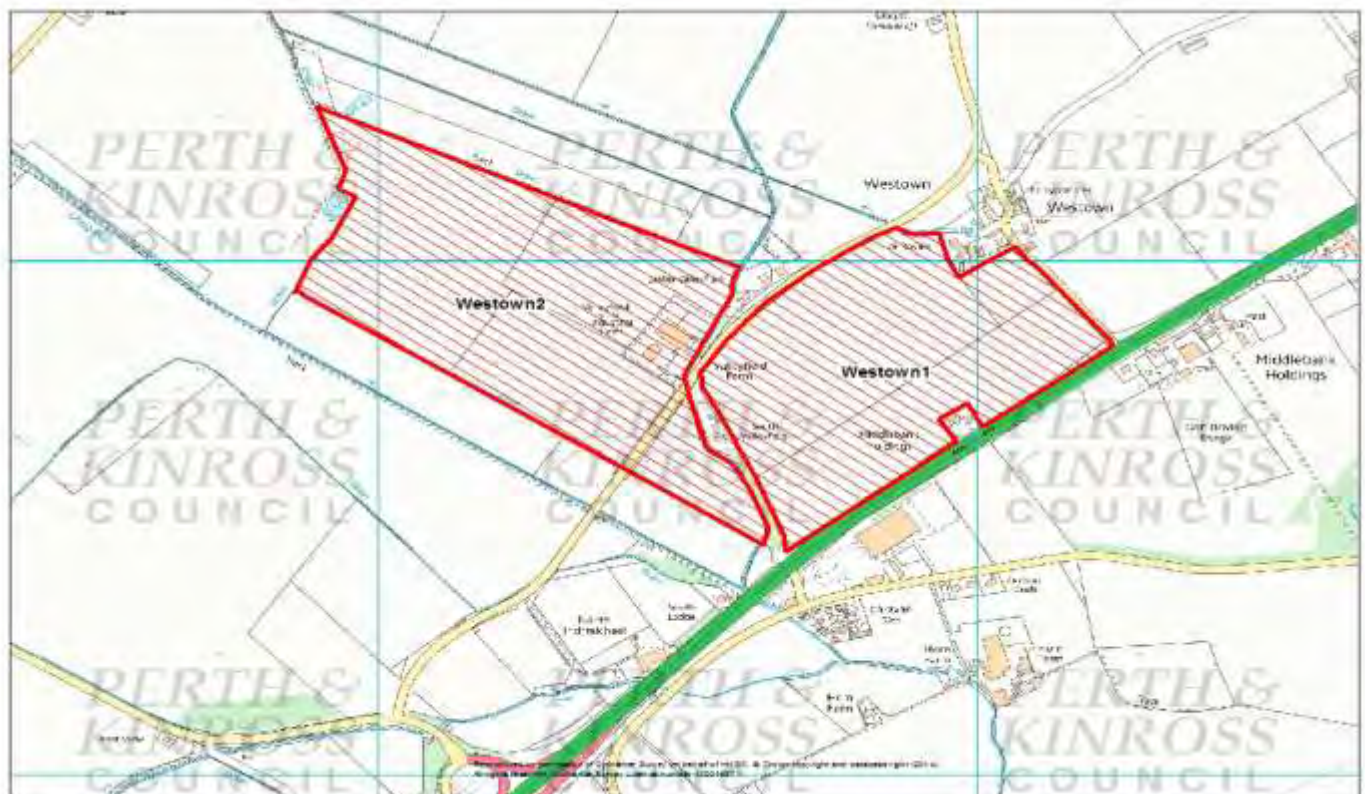


**Redgorton** – A large site proposed comprising three parcels immediately North of Redgorton (Redgorton1) for mixed use development. No indication as to the mix of uses other than the proposal will provide locally based employment opportunities. A further submission to the south of Redgorton (Redgorton2) seeks removal of this area from the Green Belt; the proposed site sits adjacent to the CTRLR band of search and H7 Bertha Park and may be designated for further housing.



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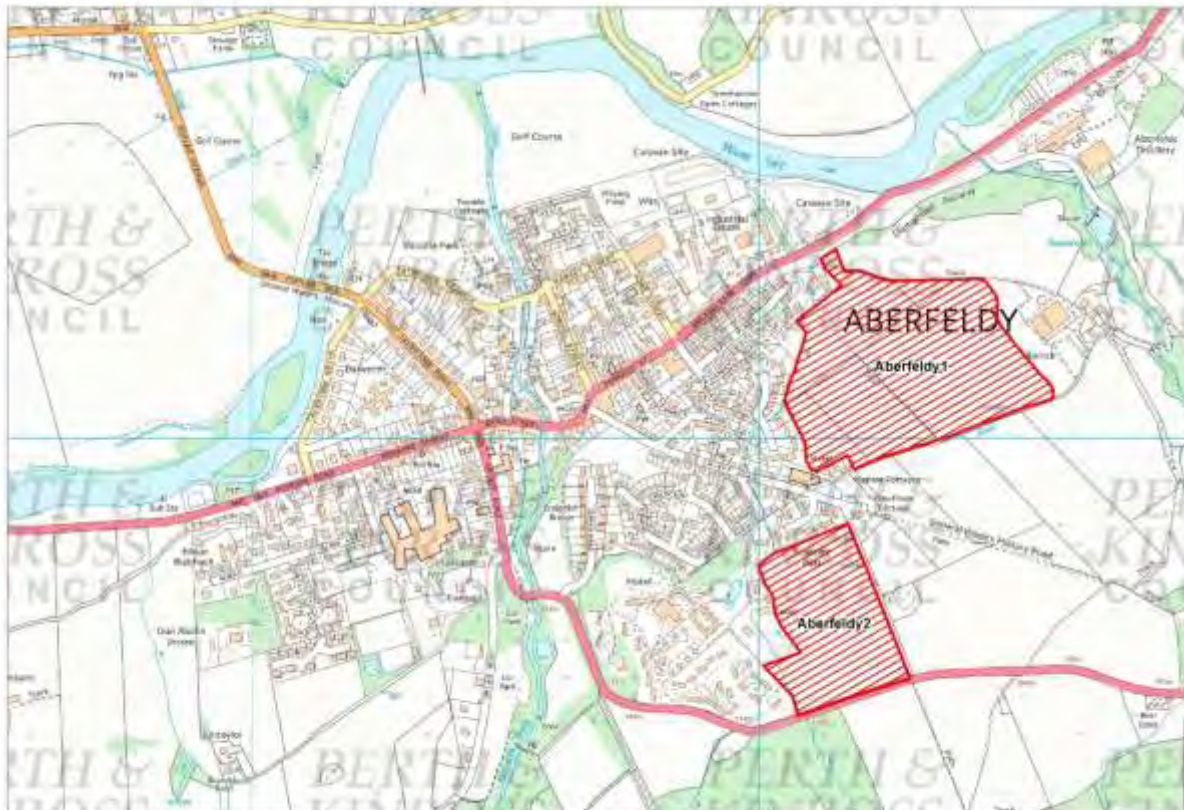
**Westtown** – Concern at any future large scale development (previous MIR sites 805 (Westtown 1) and 806 (Westtown 2) for mart, car auction site, hotel and housing).





## HIGHLAND HMA

**Aberfeldy** – One new site (Aberfeldy 2) proposed at Amulree Road for housing, leisure and community facilities which would provide for longer term growth of the town. Amendment requested to the site specific developer requirements for existing LDP site H36 (Aberfeldy 1) to allow for an alternative secondary access.



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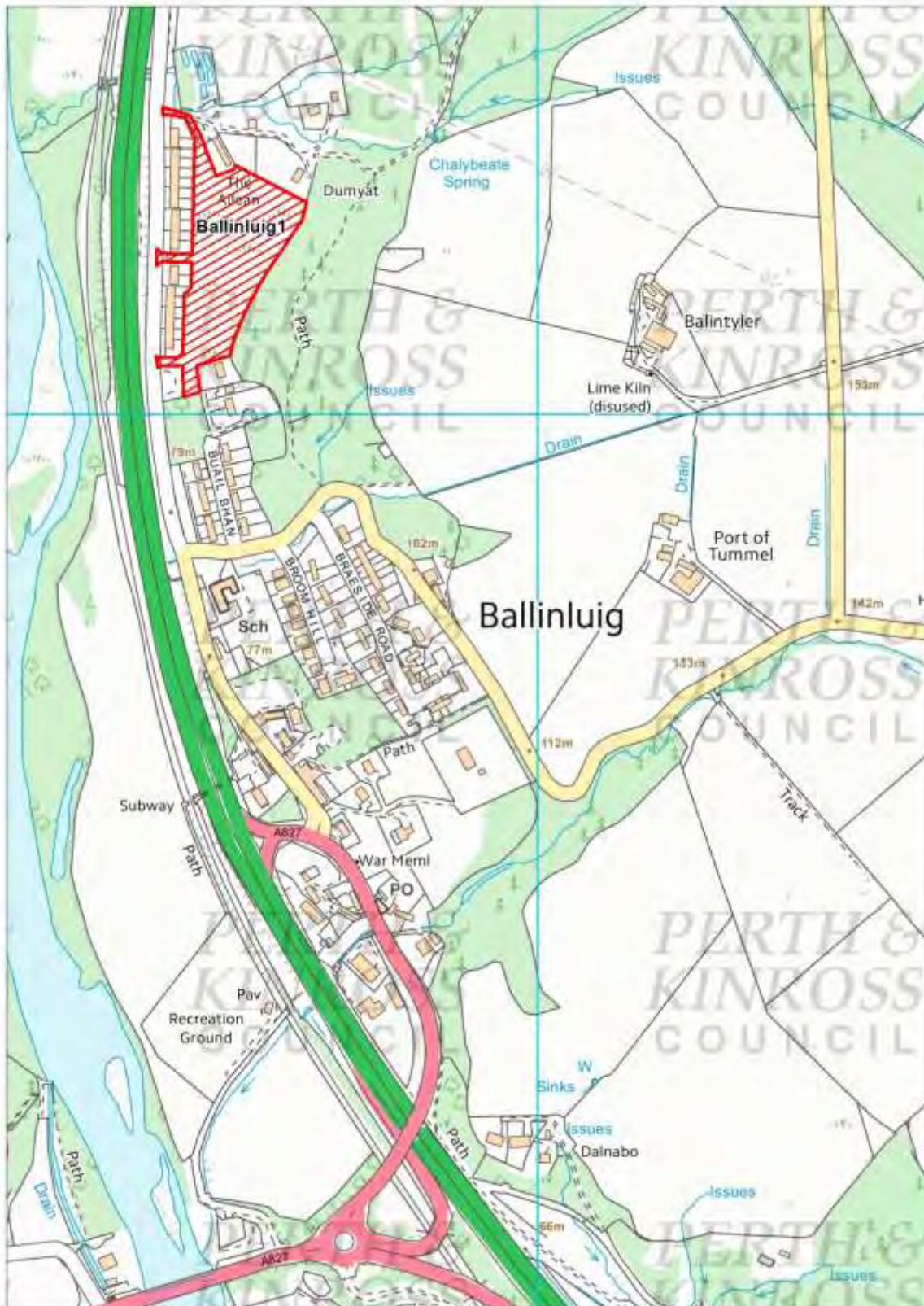
**Acharn** – One new site (Acharn 1) proposed to the North West as an extension area for the existing workshop allowing the existing old workshop to be replaced by a small modern business complex. Support expressed for the inclusion of Greenfield sites within the settlement boundary.



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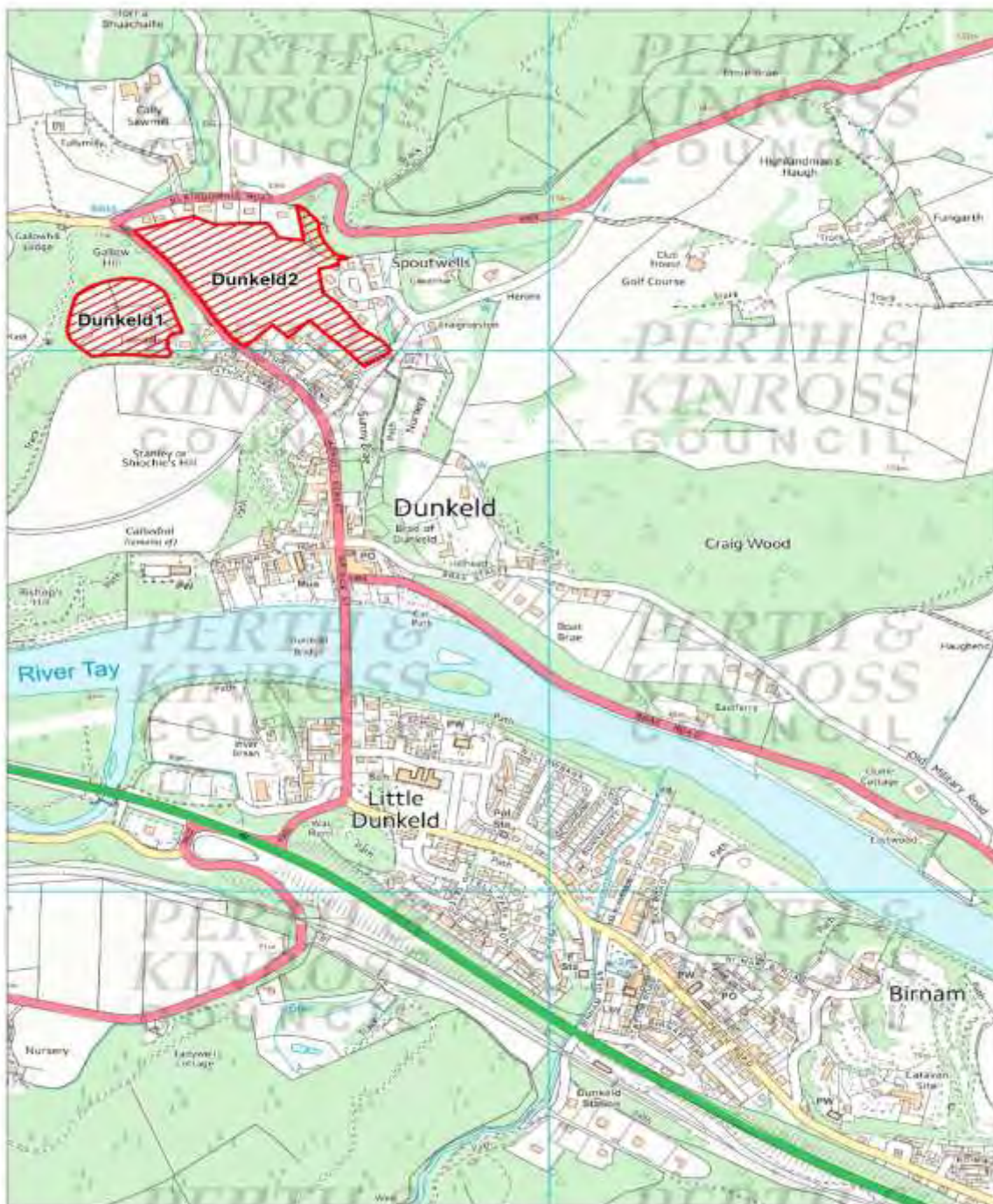
**Ballinluig** – Support for the continued LDP allocation of H40 Ballinluig North (Ballinluig 1). Traffic and congestion concerns were raised in one submission.



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**Birnam & Dunkeld** – Three new sites / areas proposed for residential development: a site for 15 units at the A923 / Blairgowrie Road (Dunkeld 2); an area to the north east (site not mapped as no boundary provided); and one site within the Designed Landscape (Dunkeld 1). Concern was also raised that the existing LDP identifies no development opportunities for new housing despite Birnam / Dunkeld being a principal settlement in TAYplan.



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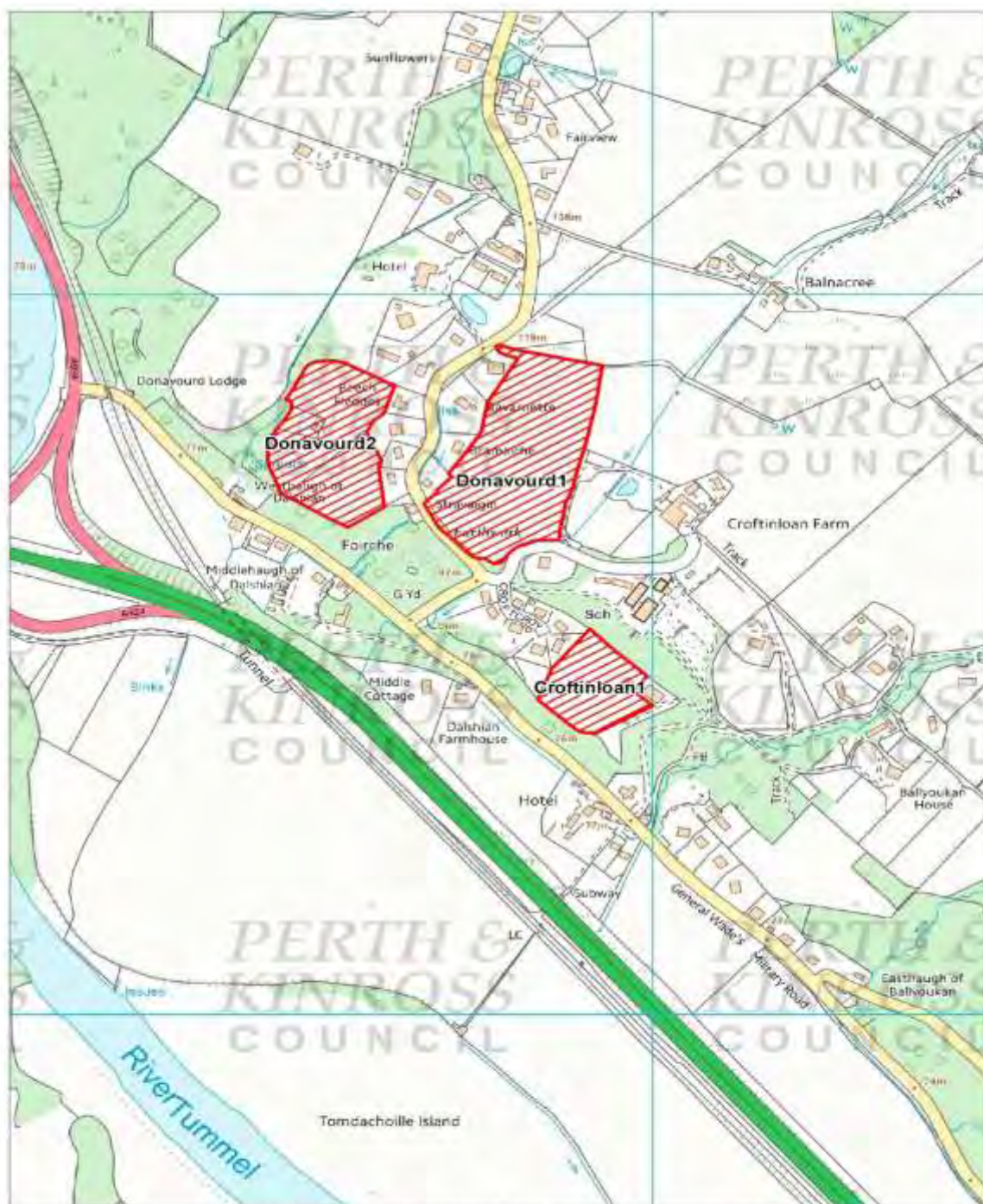
**Camserney** – A new 0.14ha site (Camserney 1) to the south east proposed for residential development.



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**Croftinloan & Donavoured** – Three new sites proposed, one within the grounds of the former Croftinloan School (Croftinloan 1) within the existing settlement boundary. The other two at Donavoured; one 2.3ha site to the west (Donavoured 2) and a 3.7ha site to the east (Donavoured 1) for 10 houses including a number of self-build plots.



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**Dull** – One new site (Dull 1) proposed for residential development at the south eastern corner.



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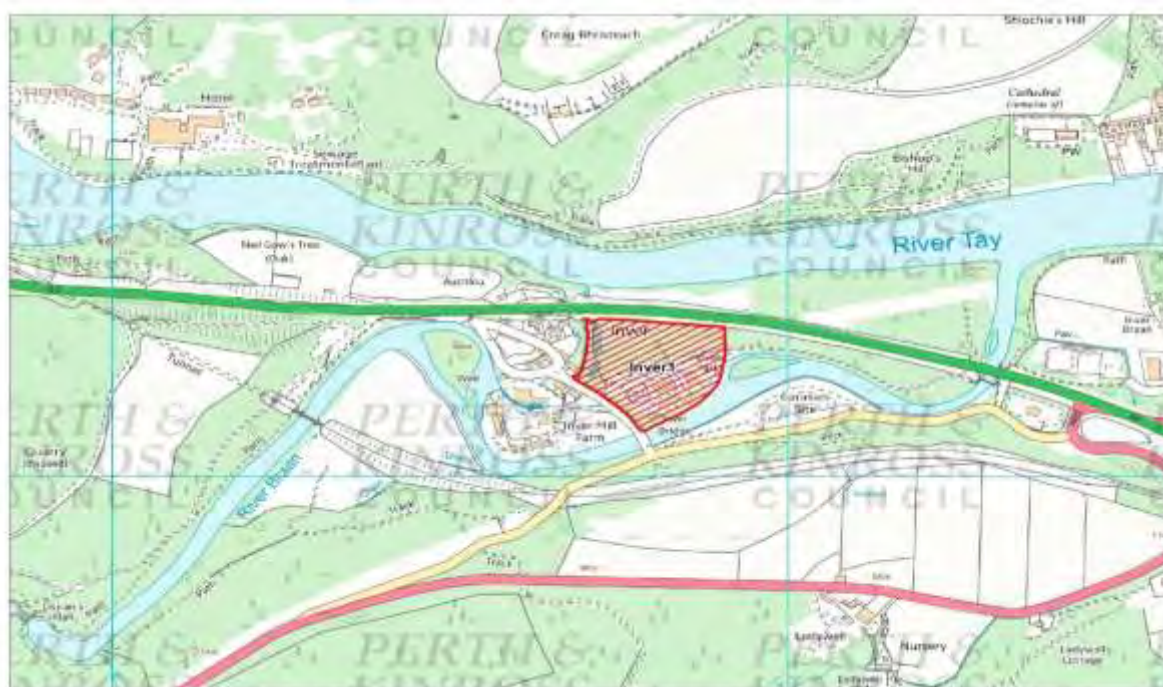


**Fearnan** – Three sites proposed for residential development. The first is a site to the east of Boreland Farm (Fearnan 1) for 30 houses. This site was considered in the previous Main Issues Report for 15 units. A second site is proposed to the east of Boreland Farm (Fearnan 2) for a further 30 houses. This site was also considered in the previous MIR for 20 units. Lastly a proposal for individual house plots (Fearnan 3). A request was also submitted for an extension of the settlement boundary at 'The Croft' where the landholding is current split in two by the boundary (site not mapped as no boundary provided).



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**Inver** – One submission for the retention of the existing employment land designation at site E14 (Inver 1).



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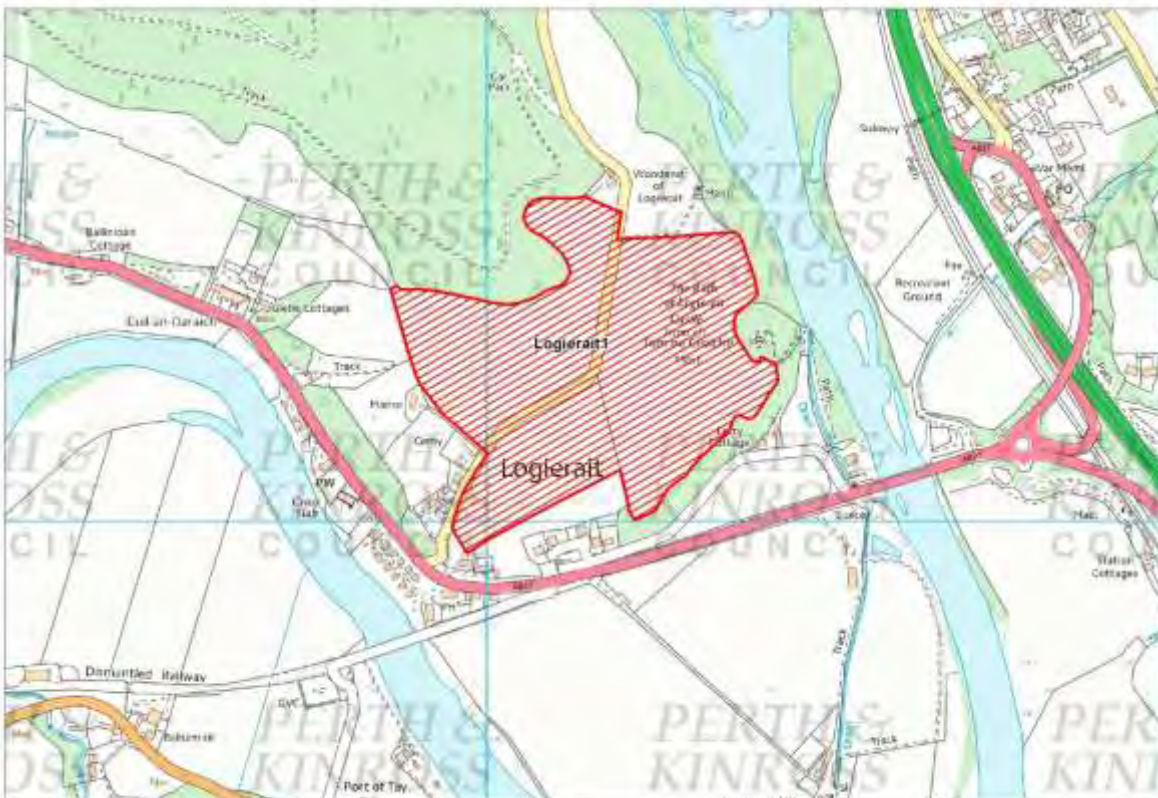


**Little Ballinluig** – One new site (Little Ballinluig 1) proposed for residential development at the former quarry to the South West. A comment was also submitted suggesting that sites should be identified in settlements other than Little Ballinluig which has almost doubled in size recently.



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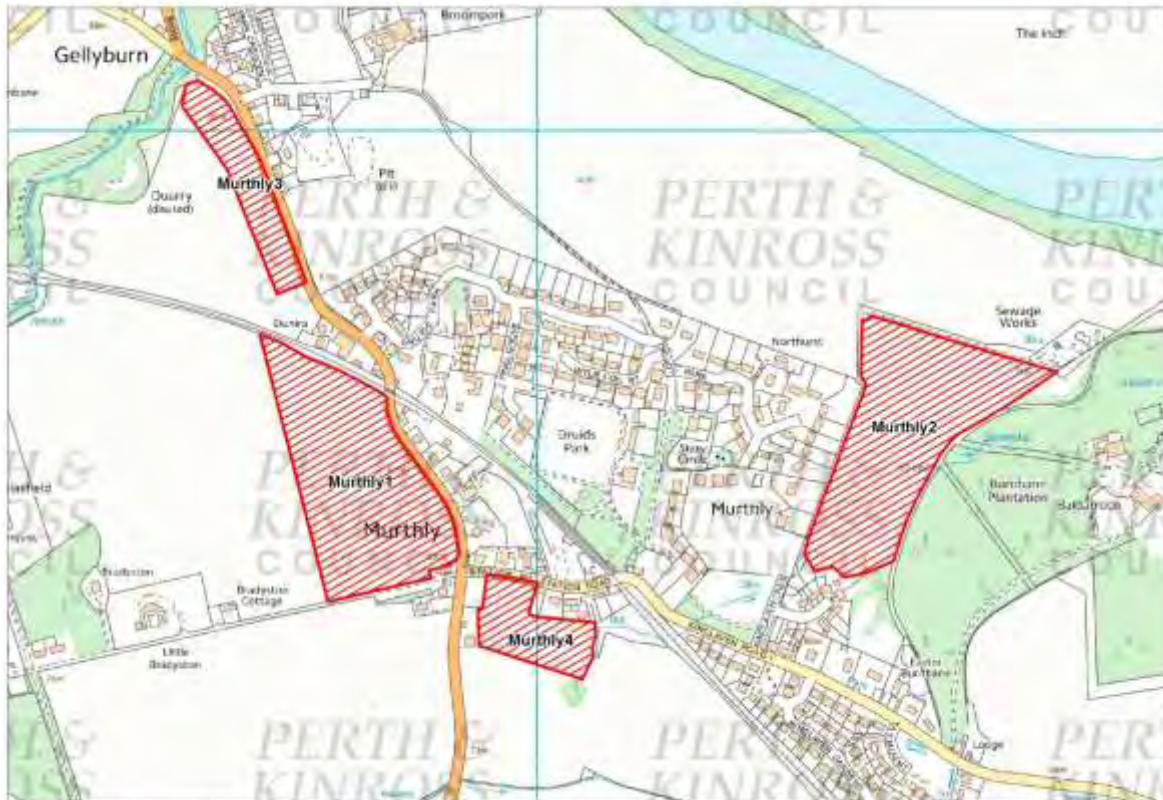
**Logierait** – A new 16.8ha site (Logierait 1) proposed for mixed use residential-led development to the north.



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**Murthly** – Three new sites proposed for residential development: a 5.75ha site behind Druids Park (Murthly 2); a 1.7ha site at Gellyburn Field (Murthly 3); and a 1.42ha site at Station Road (Murthly 4). An extension to the allocated site at H45 (Murthly 1) is also proposed. This site was promoted through the previous Proposed LDP but only part of it was included in the adopted Plan. Increasing the site depth will allow the opportunity to create a focal point for Murthly.



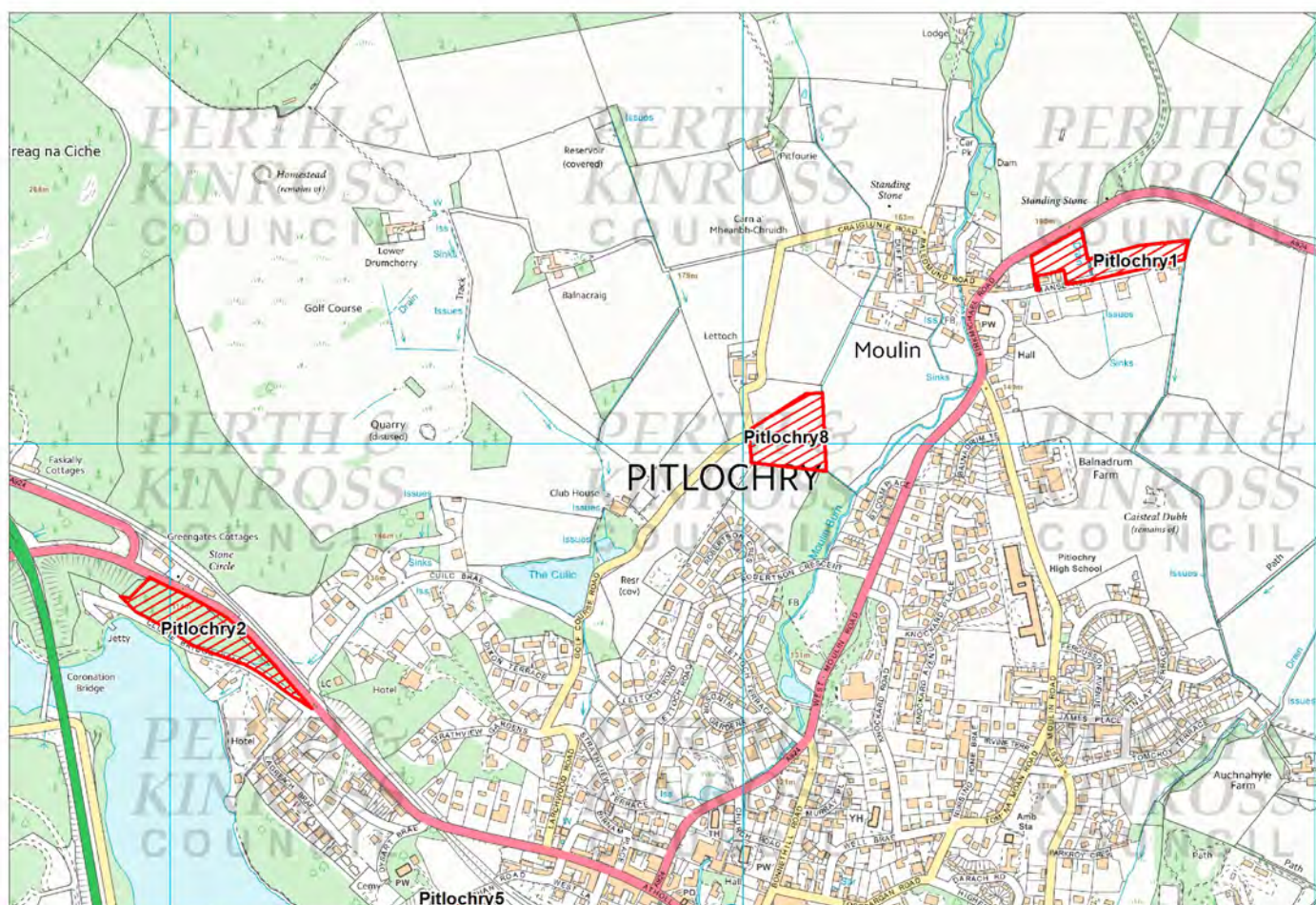
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**Pitlochry** – Five new sites proposed all for residential development, three of which for affordable housing. Sites proposed at the Armoury Woods / Armoury Stables (Pitlochry 4), Bobbin Mill (Pitlochry 6) and Burnbane (Pitlochry 7) for affordable housing possibly in conjunction with the existing allocated site at H39 Robertson Crescent. A fourth site is proposed at the former amusements car park (Pitlochry 5). All of these sites are within the settlement boundary. A fifth site outwith the settlement boundary is proposed at Clunie Bridge Road (Pitlochry 2).

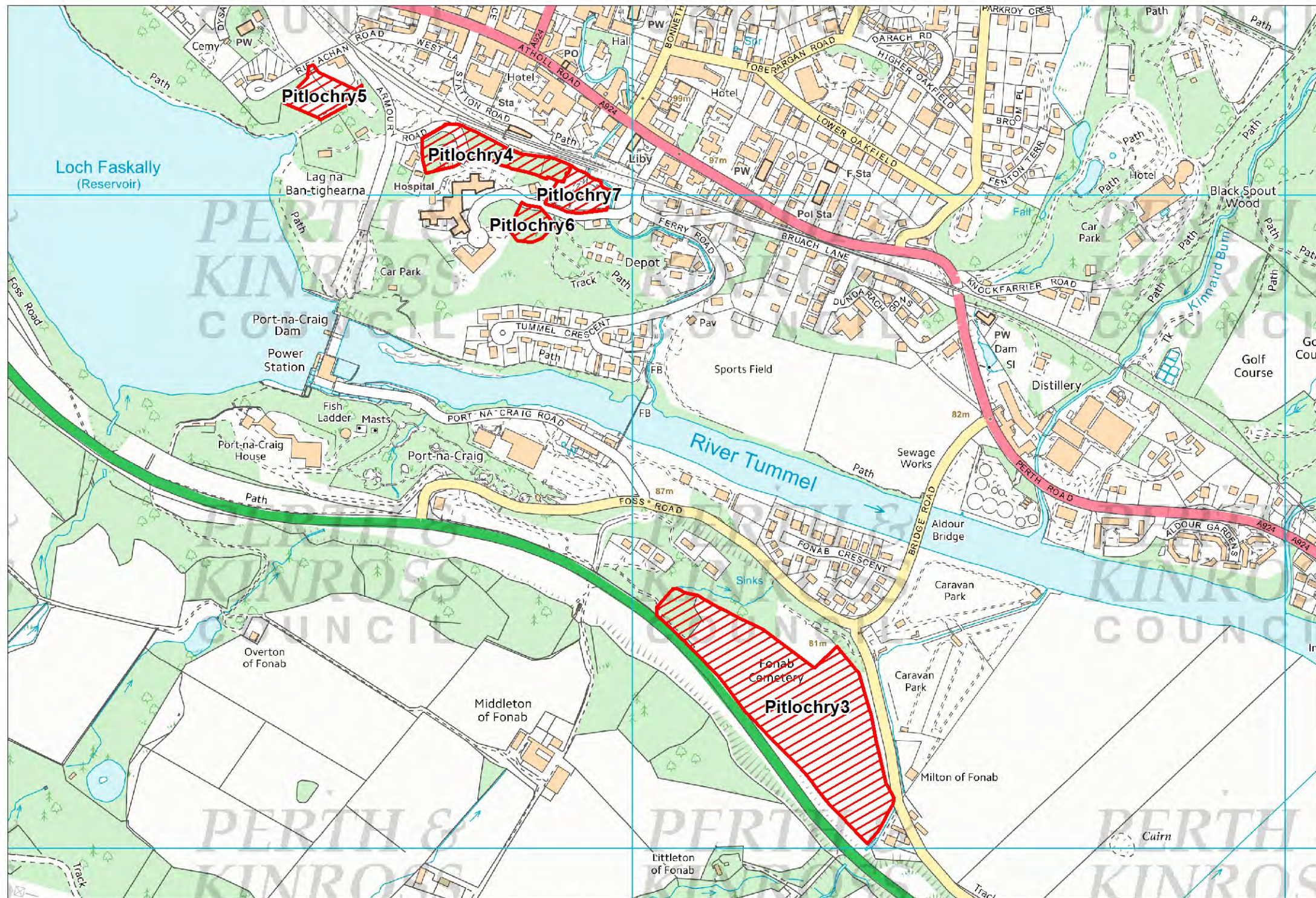
The previously considered site at Manse Road, Moulin (Pitlochry 1) is proposed for 11 houses. The site proposed is only part of the site previously considered through the last Main Issues Report.

An extension is sought to the existing LDP allocation at H39 Robertson Crescent (Pitlochry 8) to facilitate appropriate access to the site. The overall house numbers would not change. A minor extension is also sought to the existing allocation H38 Middleton of Fonab (Pitlochry 3) to increase viability of development on the site. An extension is also sought to the settlement boundary at Culic Brae although no particular land allocation is proposed (site not mapped as no boundary provided).

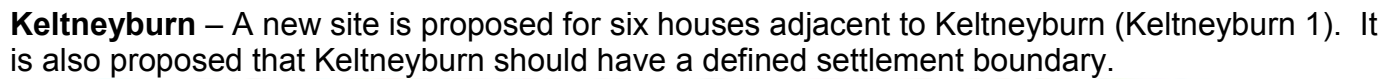


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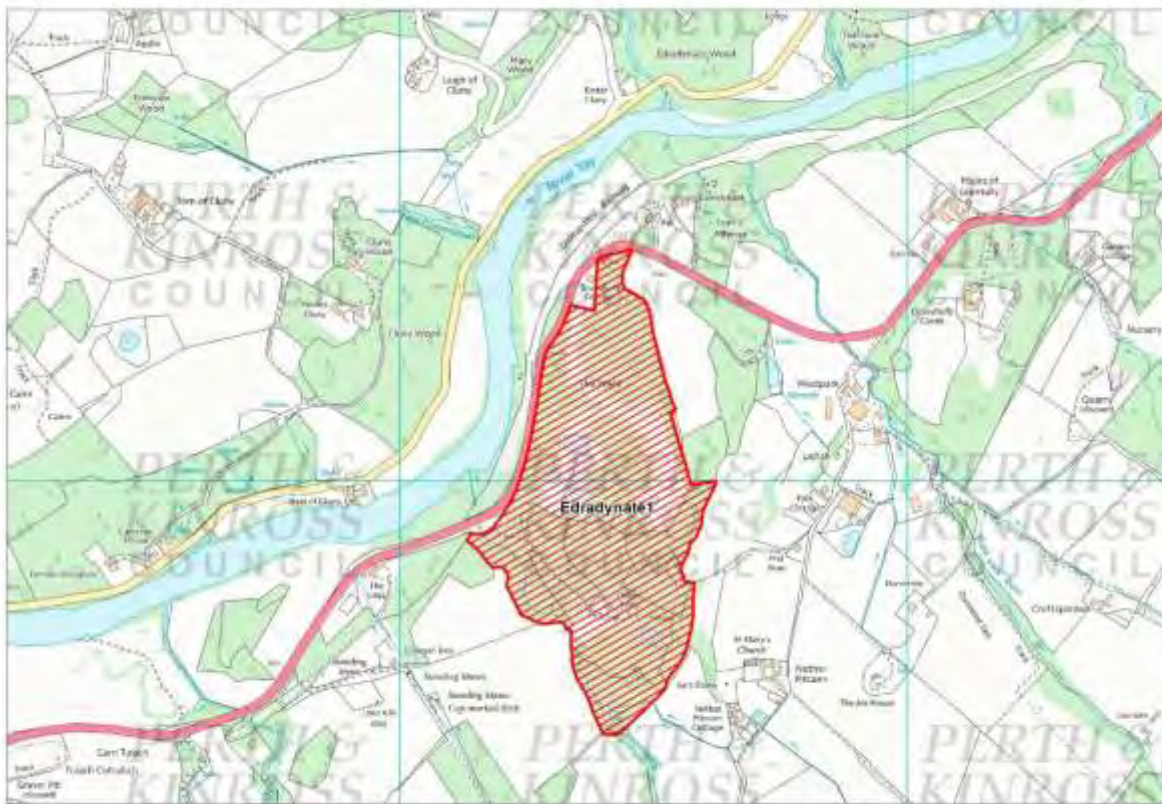






**Rannoch Station** – A new site is proposed for two infill houses (site not mapped as no boundary provided). It is also proposed that Rannoch Station should have a defined settlement boundary.

**Strathtay** – A new 23.5ha site (Edradynate 1) is proposed for leisure / tourism comprising high quality holiday accommodation at Ward Wood, Edradynate Estate.

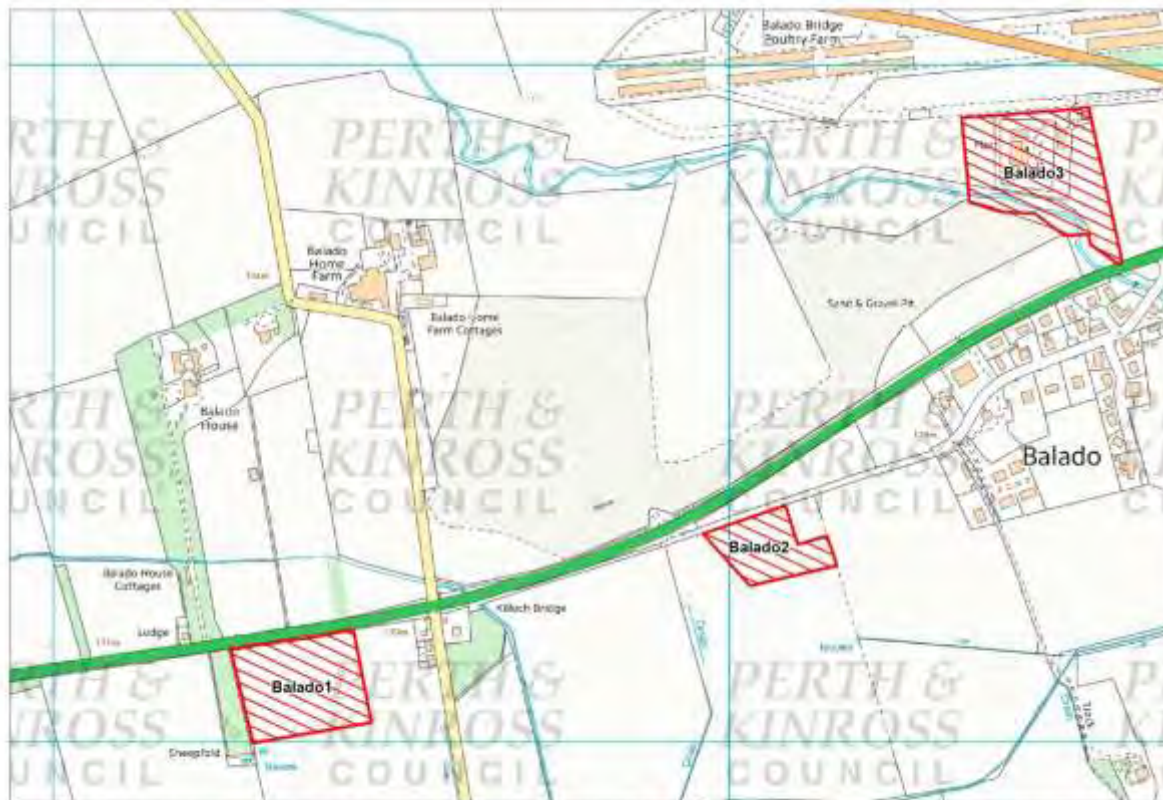


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# KINROSS-SHIRE HMA

**Balado** - 3 proposals put forward in Balado: one is the 3.4 hectare mixed use residential/tourism development proposal (Balado 3) on the former MOD site (residential use here was resisted in the current LDP); another for 1.8 hectare residential site (Balado 2) west of H51 (resisted in current LDP), whilst there is a new 2.7 hectare residential site (Balado 1) proposal at Balado junction (suggesting that this level of development may facilitate adoption by Scottish Water of an independent sewerage plant).



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**Blairingone** - New 10.5 hectare proposal (Blairingone 1) for a wider residential allocation including land south of the A977 (beyond the current LDP H74 allocation for 30 homes) suggesting opportunity to consider and identify solutions to local transport issues including traffic calming, and support of local services. Also a request for a bypass.



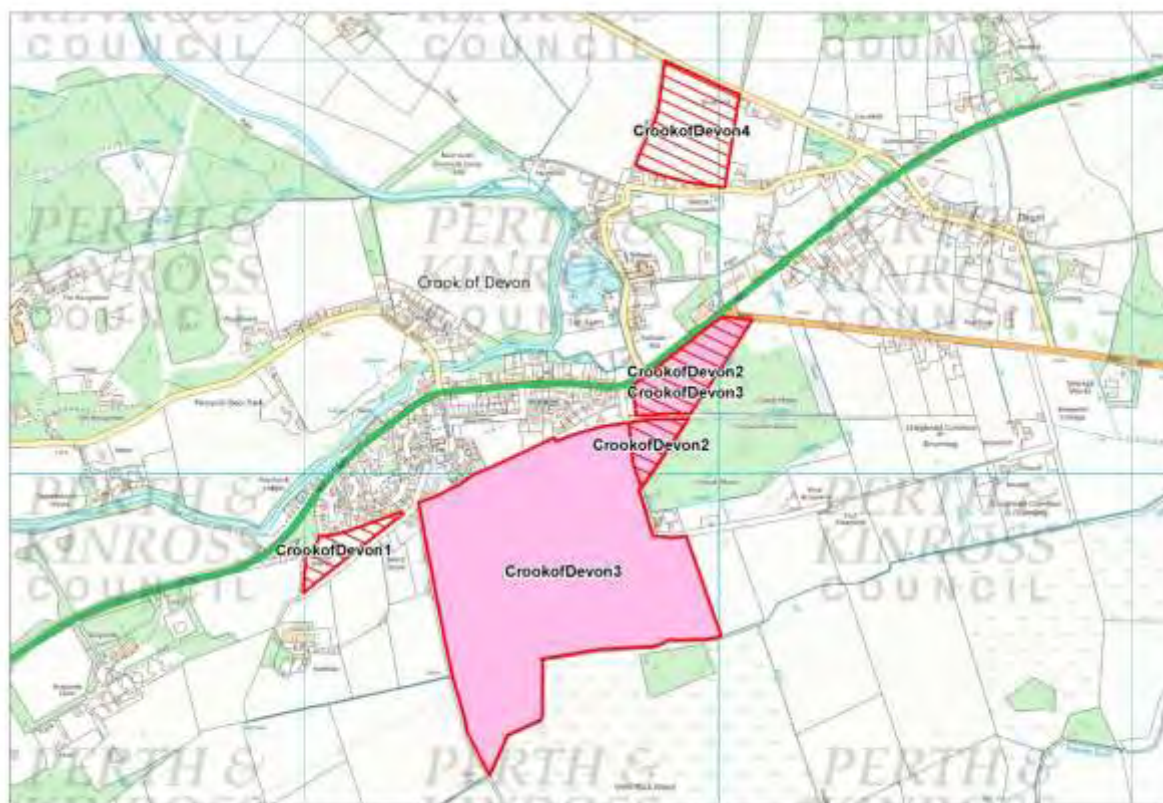
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**Crook of Devon** - 2 proposals (Crook of Devon 1) submitted for the 1.2 hectares of Church of Scotland glebe land south of West Crook Way, one for a replacement of the manse and offering land for PKC to provide 6 car parking spaces, and the other for residential development which would support improvements to the primary school and off-site public space.

A previously considered proposal at Harelaw Farm is put forward, either as a larger expansion site of 36 hectares (Crook of Devon 3) possibly including by-pass, or as a smaller site (Crook of Devon 2) on next to the village hall that could incorporate traffic calming measures on the A977 A977 eg a new roundabout, and a footpath and pedestrian crossing to improve the amenity and safety of the village.

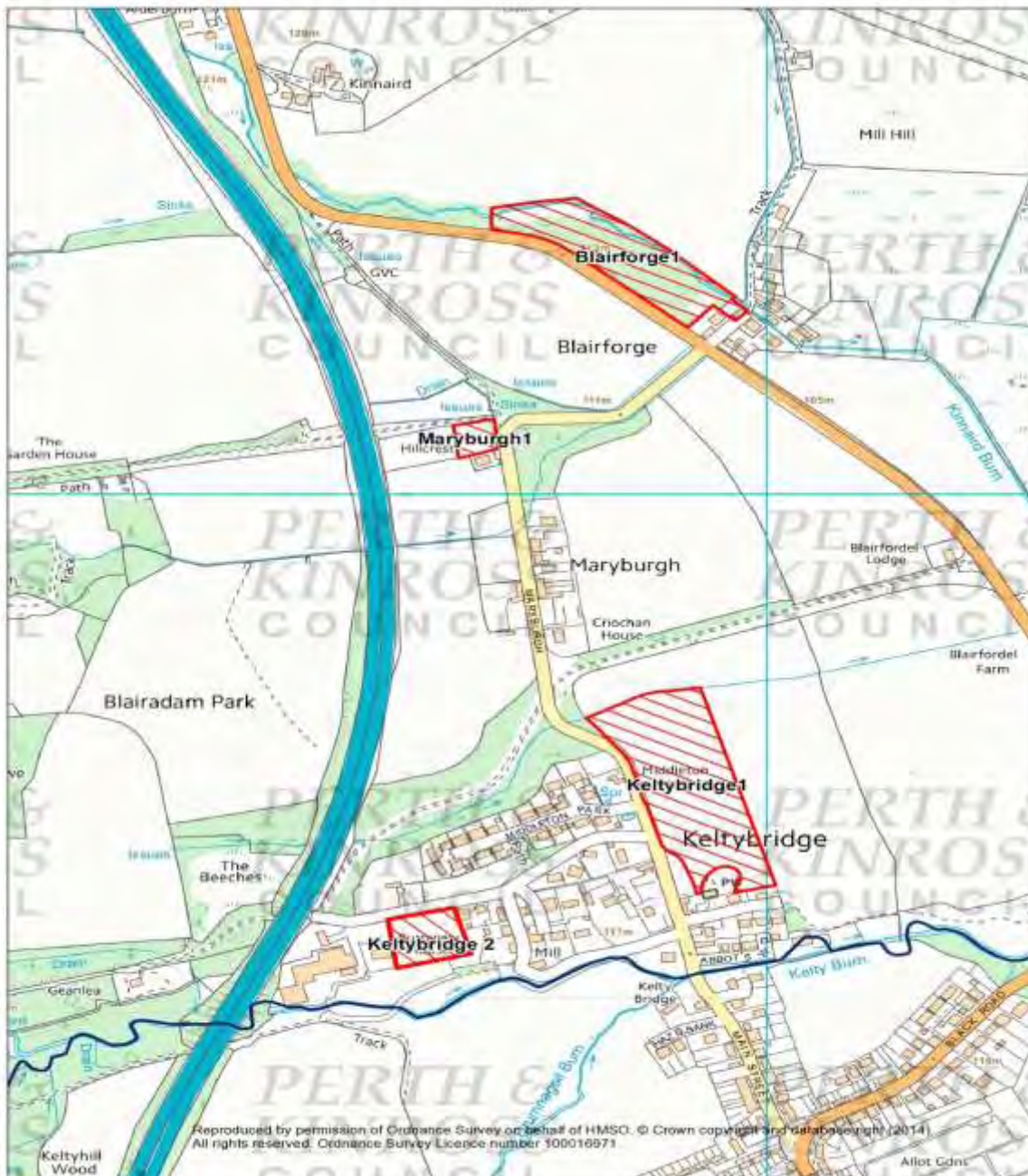
Another previously considered proposal is put forward for a 15-20 home development (Crook of Devon 4) on sloping fields to the north of Crook of Devon (proposing various wider benefits within the proposal including offsetting costs for a 900KW power generation facility utilising the River Devon).



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**Keltybridge Maryburgh and Blairforge** - A couple of small scale proposals at Keltybridge and Maryburgh (Keltybridge 2 and Maryburgh 1) are put forward which were both considered previously in the LDP. Also a previously considered Keltybridge (Keltybridge 1) 3 hectare residential proposal east of the B917 was suggested (proposing that this could also deliver additional parking facilities for the community hall and that land could be made available to improve the footpath linkage to Lochore meadows from Keltybridge. Also a previously considered 1.9 hectare brownfield site at Blairforge (Blairforge 1) is proposed again.





**Kinneswood** - Proposed extension of settlement boundary (Kinneswood 1) at Bishop's terrace for 1 plot that the reporter excluded on basis that it contributes to the attractive setting of the village, developer A + J Stephens proposes that CC have reached agreement to transfer 6 hectares of hill land (Kinneswood 2) if they support the one plot proposal however Portmoak Community Council state that they are still considering this offer but are seeking allocation of hill land as amenity/open space.



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**Kinross** - Various general issues raised including: development at the pier for a visitor attraction; need for focus on brownfield development and empty properties; a lot of representations seeking retention of LDP Proposed plan H46 as open space or developed as a woodland amenity area; retention of the Market Park site as open space, and seeking land at Turfhill opposite Moto services to remain outwith the settlement boundary.

Proposals suggested are: 5.5 hectare proposal to re-designated Option 15 (Kinross 3) of the LDP from primary school to residential uses and possibly some community uses; proposal for LDP H47 (Kinross 4) to increase from 260 to 400 homes with the site boundary extended to the west and the density increased; for PKC supported Proposed Plan H46 (Kinross 1) as a residential site, and separately for just the paddock areas at northern end (Kinross 5); PKC supported part of this site (Kinross 2) in the Proposed Plan LDP and a leisure, speciality shopping and commercial is proposed again on 18 hectares of land west of the M90.



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**Milnathort** - Proposal for a new conservation area for Milnathort submitted by the Kinross-shire Civic Trust (backed by Perthshire Heritage Trust, Scottish Civic Trust, The Architectural Historical Society of Scotland, Kinross-shire Historical Society, Kinross-shire Museum Trust).  
Proposals submitted that were previously considered for residential development: 2 hectares at Auld Mart Road (Milnathort 3); and 0.3 hectares at Moss Road yard offices and workshops (Milnathort 2) and by Kinross Estate Company for 250-300 homes proposal at Perth and Burleigh road (Milnathort 1) across 3 sites and 13 hectares suggesting this could redefine the eastern boundary and enhance the setting of Milnathort.



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### Powmill summary

Proposal for a mixed use development on a 6 hectare site between Aldi road and A977 (Powmill 1) with energy centre, farm shop, crèche, business hub, equestrian centre, assisted living and residential to replace the LDP designated H53 and E23 sites.



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## Rumbling Bridge summary

Proposal previously considered in the LDP for a 1.5 hectare housing allocation (Rumbling Bridge 1) on land 100 metres south of Merryorchard Rumbling Bridge.



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## Scotlandwell and Kilmagadwood summary

Representations from members of the public: seeking retention of their separate settlement boundaries to protect their visual amenity and character whilst Cllr Barnacle supports their linkage into one settlement boundary; and from Portmoak Community Council supporting a modest increase to site H54 subject to various caveats, and that car parking provision and pedestrian pathways should be reviewed when considering developments here.

New proposals for Scotlandwell: for 1.5 hectares of residential development (Scotlandwell 2) south of H54 and 1 hectare of community woodland; and for 1 hectare residential development on the eastern edge of Scotlandwell (Scotlandwell 1) to help to fund improvements to the race horse business at Kinneston Farm; and for 0.9 hectares residential development (Scotlandwell 4) in and behind existing building line north of and accessed off Leslie Road. Whilst previously considered 1 hectare of residential development (Scotlandwell 3) east of H54 is again put forward for consideration. Request that Kilmagadwood and Woodmarch should retain their separation.



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**Kinross-shire Landward Area:** The following proposals / comments have been put forward for specific settlements / areas within the landward area:

**Cleish** - There is a proposal for residential development of up to 6 homes on 1.2 hectares of garden and estate grounds (Cleish 1) on Nivingston Estate.



**Greenacres** - the traveller site boundary at Greenacres should be enclosed to prevent further retrospective actions and to secure landscaping and tree screening.

**Wester Balgedie** – request for a bypass.



## STRATHEARN HMA

**Aberuthven** - One suggestion was received for around 3 ha of land to the east of Aberuthven Cemetery (Aberuthven 1) for housing. The site is outside the settlement boundary and was suggested at MIR but not included in the Proposed LDP for the reason given above.



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**Auchterarder** - The MIR noted that over 60% of Strathearn's effective housing land supply at that time was located within Auchterarder. This was more than adequate to meet demand in the Auchterarder area beyond the plan period and accordingly it was not considered an option to meet any of the additional housing land requirement at that time within Auchterarder. There were several suggestions put forward at that time for additional sites however none were taken forward to Proposed LDP stage for that reason.

Should the LDP sites in the town be progressing at a faster than expected rate, it may be necessary to think about where sites for housing will be found towards the end of the next plan period, and the following submissions should be considered in this context.

Submissions were received for six sites in and around the Auchterarder area, all suggesting housing except one at Shinafoot that suggests mixed use.

Firstly, three housing sites were suggested at two locations, Gallowhill and Castlemains North, which are considered together as a group (Auchterarder 1,5 – split site). These sites have been previously considered at LDP examination as extensions to the Framework sites but have not been included for the reason above.

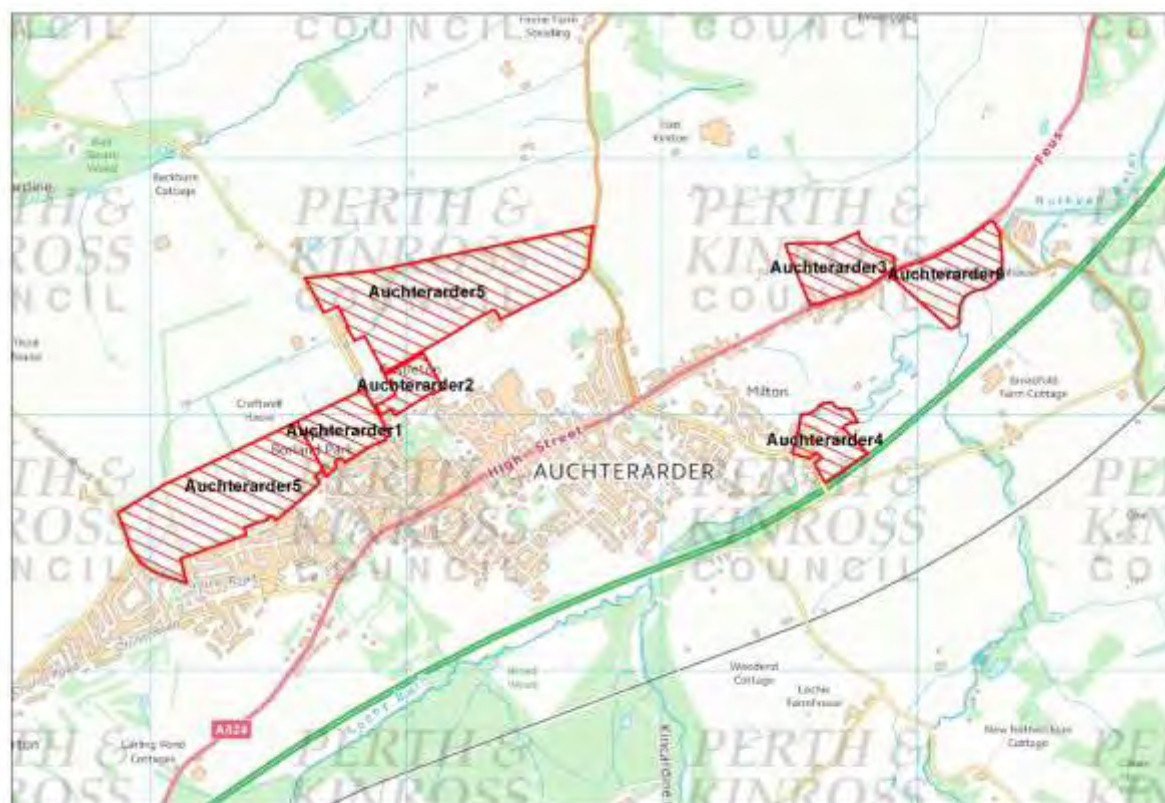
Secondly, a site at Castleton Road (Auchterarder 2) was suggested for housing. This site is inside the settlement boundary and parts of the site already have planning consent for housing.

Thirdly, a suggestion was received in respect of housing on the land that was formerly identified for employment uses in the Auchterarder Development Framework (Auchterarder 3). The MIR sought views as to whether there may be better options for employment land in the town and the LDP allocated an alternative site, leaving open the option to develop additional housing on the original framework site, which is inside the settlement boundary.

Fourthly, the site of the unused Ruthvenvale Mill and surrounding area (Auchterarder 4) was suggested for housing. This is currently allocated partly as existing employment land and partly as white land in the settlement boundary, while the remainder of the suggested site is outside the settlement boundary. It has previously been considered at MIR and LDP examination however was not included for the reason above.

Lastly, the mixed use suggestion is on a site at Shinafoot (Auchterarder 6). Currently in agricultural use, little detail is given as to the suggested mix of uses on this site, which is outside the settlement boundary.

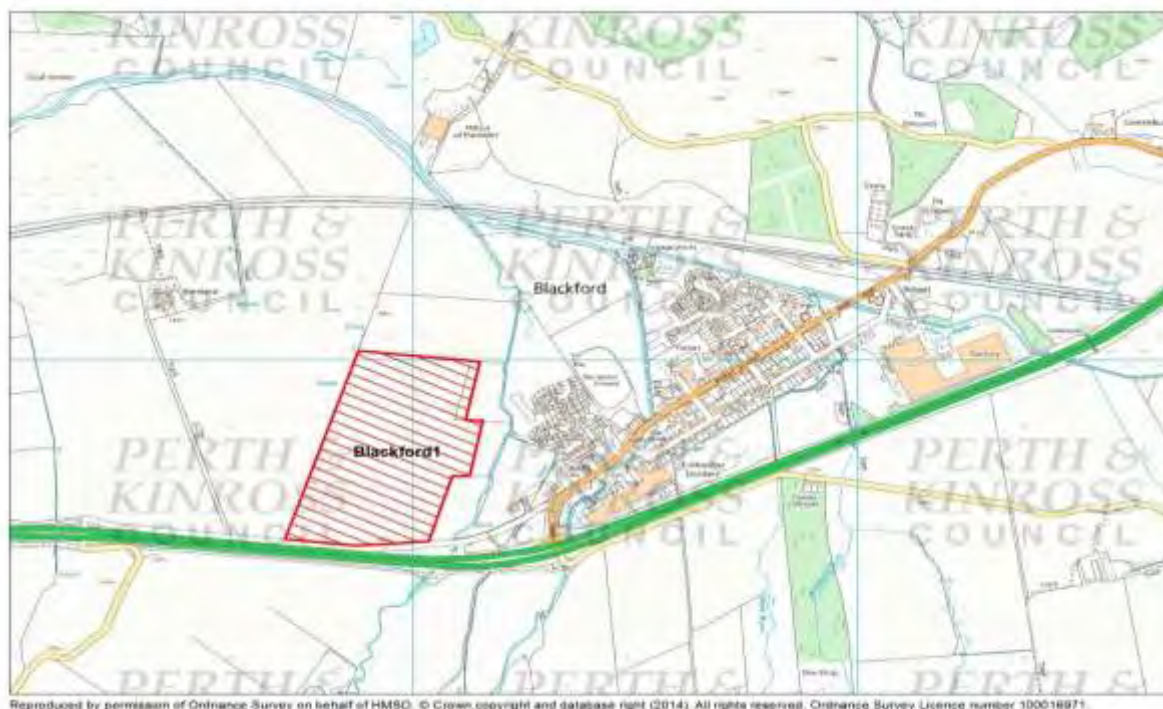




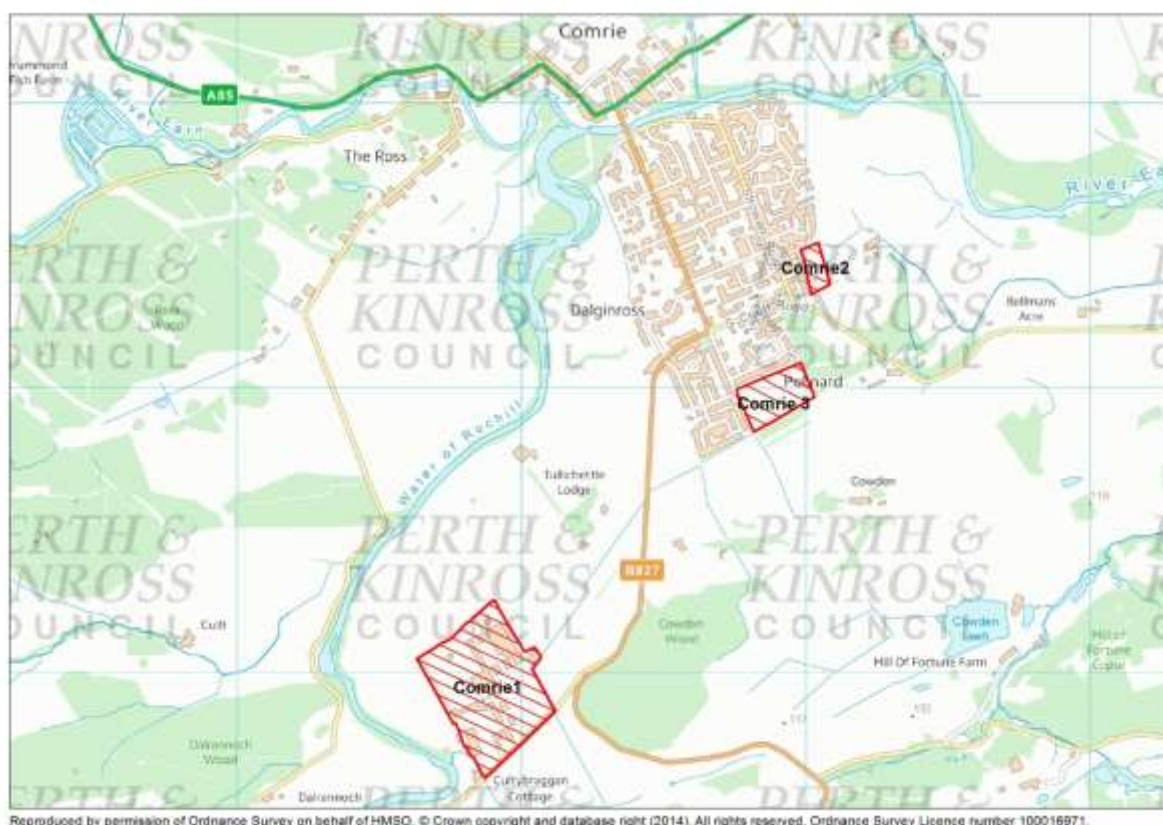
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**Blackford** - A submission was received from Blackford Farms relating to around 8 ha of land to the west of the village (Blackford 1) suggesting its development for housing. Adjacent to but outside the settlement boundary, this site is suggested as an extension to the Mill of Ogilvie development site.



**Comrie and Cultybraggan** - In Comrie, a submission was received seeking to change the Cultybraggan Camp (Comrie 1) from its existing employment status to more of a mixed use allocation, to reflect its character and the history of development at the site. This suggestion has come from the Comrie Development Trust, which owns and operates the site. A new site of around 11 ha was suggested at Dalginross Farm (Comrie 2) for housing, proposing that the village will be more rounded off should this site be included in the settlement boundary. A submission was received in respect of land at Cowden Road (Comrie 3) that is already allocated in the LDP for housing (H58), and the submission seeks to maintain the allocation.





**Crieff** - Several submissions raised issues in respect of Crieff, notably seeking enhanced policy support for the town centre, and calling for the LDP to investigate traffic flow and road safety issues. Now that Tesco no longer propose to develop a supermarket in the town, there was a request for alternatives to be examined including another search for a suitable town centre site. A call for action on Crieff's vacant and derelict sites was made; and it was proposed that the LDP should enforce completion of stalled housing development sites before considering progression of new sites. Broich Road and south Crieff was suggested as an area that would benefit from renewed masterplanning, since circumstances have overtaken the approved planning brief that dates from 2006.

No genuinely new proposals were submitted in respect of Crieff. Four submissions were received that had been previously considered through the LDP process but were either not supported; or not allocated following examination.

The submissions are: firstly a site at Alichmore, south of Strowan Road (Crieff 2) suggested for housing. This site was not included in the MIR or the Proposed LDP but was considered and rejected by the Reporter at the LDP examination.

Secondly, a 3.2 ha site at Laggan Road (Crieff 3) suggested for housing, with an indicative figure of 50 units. This site was consulted on for the MIR and was included in the Proposed LDP but the Reporter recommended its removal in the absence of evidence on the adequacy of the existing local road system to accommodate the development.

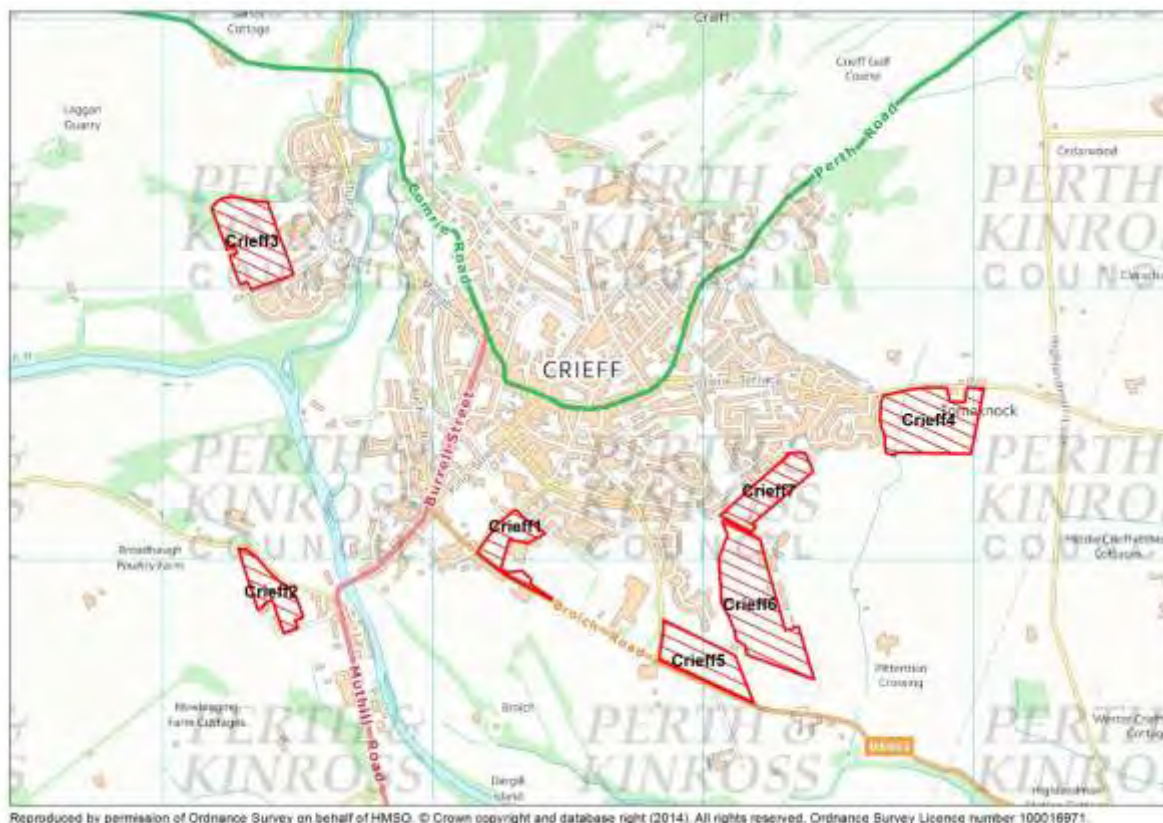
Thirdly, a 7.7 ha site at south Tomaknock (Crieff 4) suggested for housing, with an indicative figure of 100 units. This site was previously considered as part of a MIR option but it was not the preferred option because of adverse landscape impact.

And lastly, an assembly of three sites east of the town (Crieff 5-7) suggested by a housebuilder on behalf of the various owners for housing with a supermarket and pub/restaurant. The southernmost site in this group was consulted on for the MIR but none of the sites in the group were included in the Proposed LDP.

A submission was received in respect of land to the west of Duchlage Farm (Crieff 1) that is held by a company on behalf of Tesco Stores Ltd. The site is already allocated in the LDP for retail use and the submission seeks to maintain the allocation. The site has an implemented consent for a supermarket.

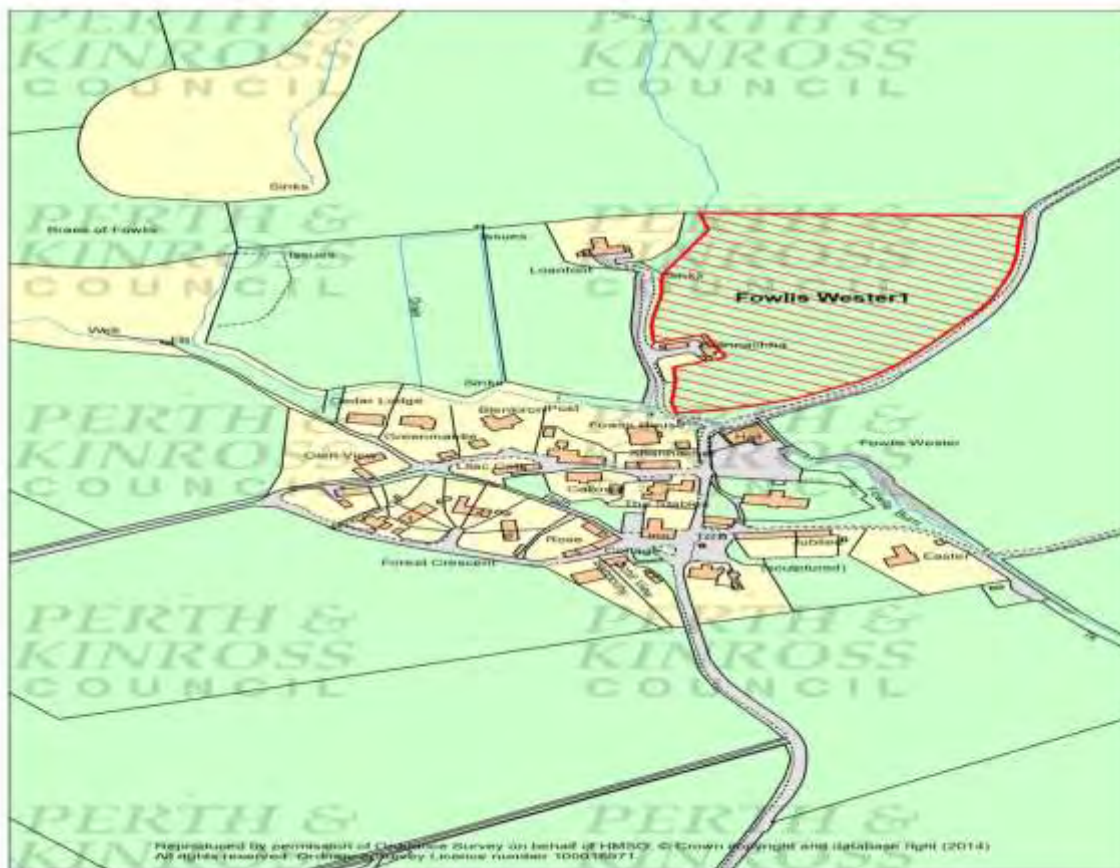


## Crieff



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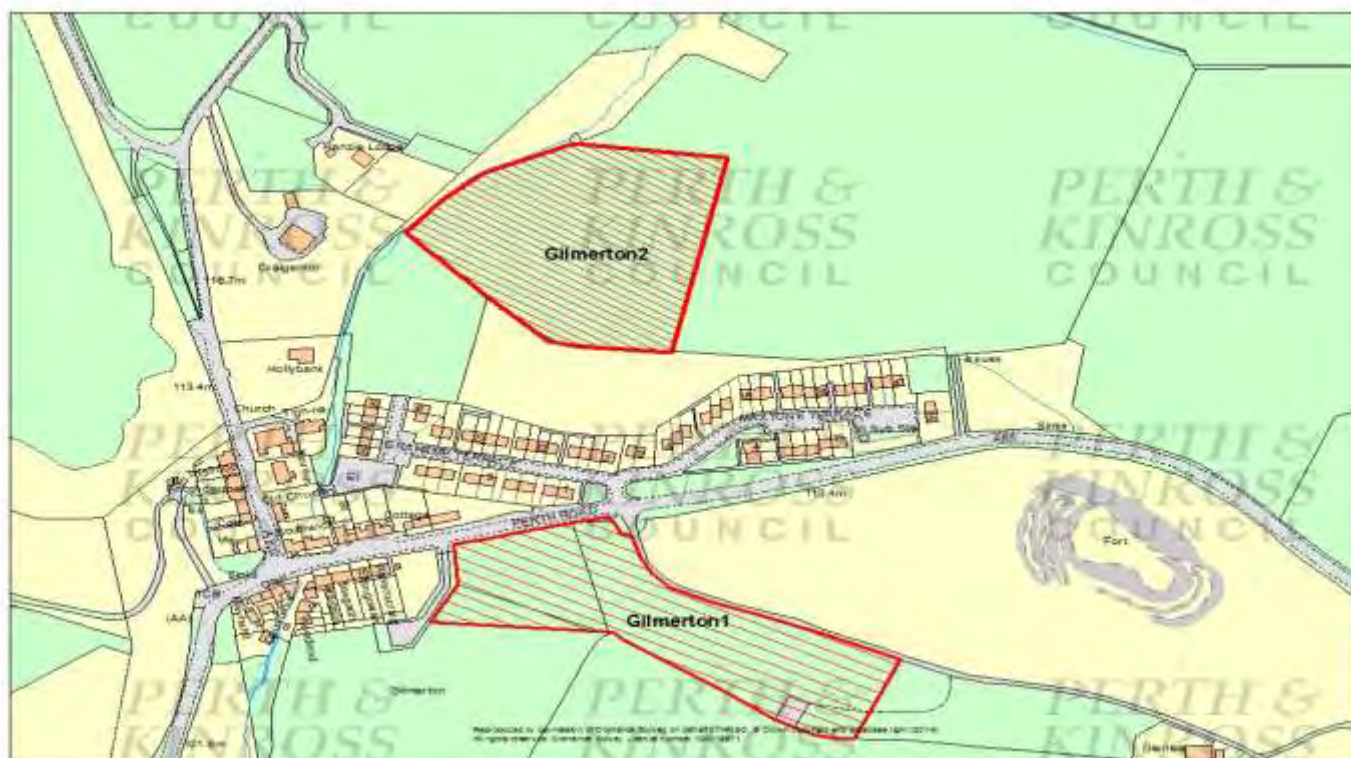
**Fowlis Wester** - A new site north of Fowlis Wester has been suggested for housing (Fowlis Wester 1). Measuring around 2 ha, it is suggested that the site could be developed for 40 houses and could be developed in such a way to be a natural extension to the settlement but also separate from it.



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**Gilmerton** - Two sites have been suggested for housing, both of which were previously considered at MIR stage: one site to the south of the settlement (Gilmerton 1) which is around 1.6 ha; and one site to the north of the settlement of around the same size (\*Site to be plotted\*). Both sites are suggested for executive style detached housing.



**Gleneagles** - Two sites were suggested in respect of Gleneagles. Both were previously considered at MIR stage but were not taken forward for the same reason as the Auchterarder suggestions at that stage, namely that it was not considered an option to meet any of the additional housing land requirement at that time within the Auchterarder area.

The first site is east of Firhill (Gleneagles 1) and suggests the land could be developed as a small housing site of five units of fewer. As such a specific allocation is not being sought, instead an amendment to the settlement boundary to incorporate this site is suggested.

The second site is that of the former Muirton Coachworks (Gleneagles 2), now demolished. Housing is suggested for this brownfield site, which is around 0.7 ha and is inside the settlement boundary.

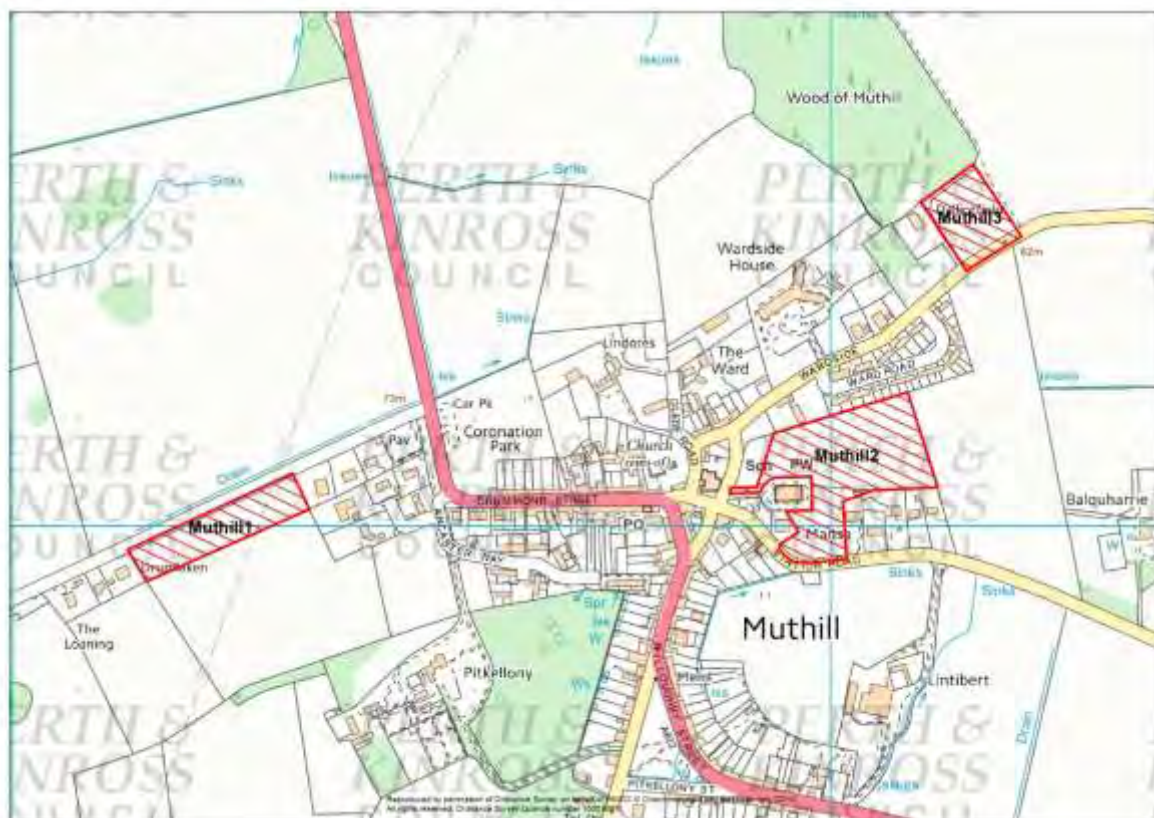




**Muthill** - Three sites were suggested in respect of Muthill, all of which were previously considered at MIR and Proposed LDP stage but not taken forward.

Firstly, a 1 ha site at Golf Course Road (Muthill 1) was suggested for a small settlement boundary extension, with a view to its development for housing once overhead power lines are removed. Self-built plots are suggested. Secondly, a site to the rear of Station Road (Muthill 2) was suggested for a mix of housing. The site is partly inside and partly outside the settlement boundary; and lastly Lastly, a site at Dalliotfield on the eastern corner of the settlement (Muthill 3) was suggested for a low density housing development. This site is outside the settlement boundary.

The Reporter considered the three sites at the LDP examination but his recommendation was not to include any of them, citing the scope for infill elsewhere in the settlement. In the case of Muthill 1, he also cited the undesirability of ribbon development; and when considering Muthill 2 he also cited adverse impact on the listed church, for which this site provides some setting. He recommended its allocation as open space.





## St Davids Summary

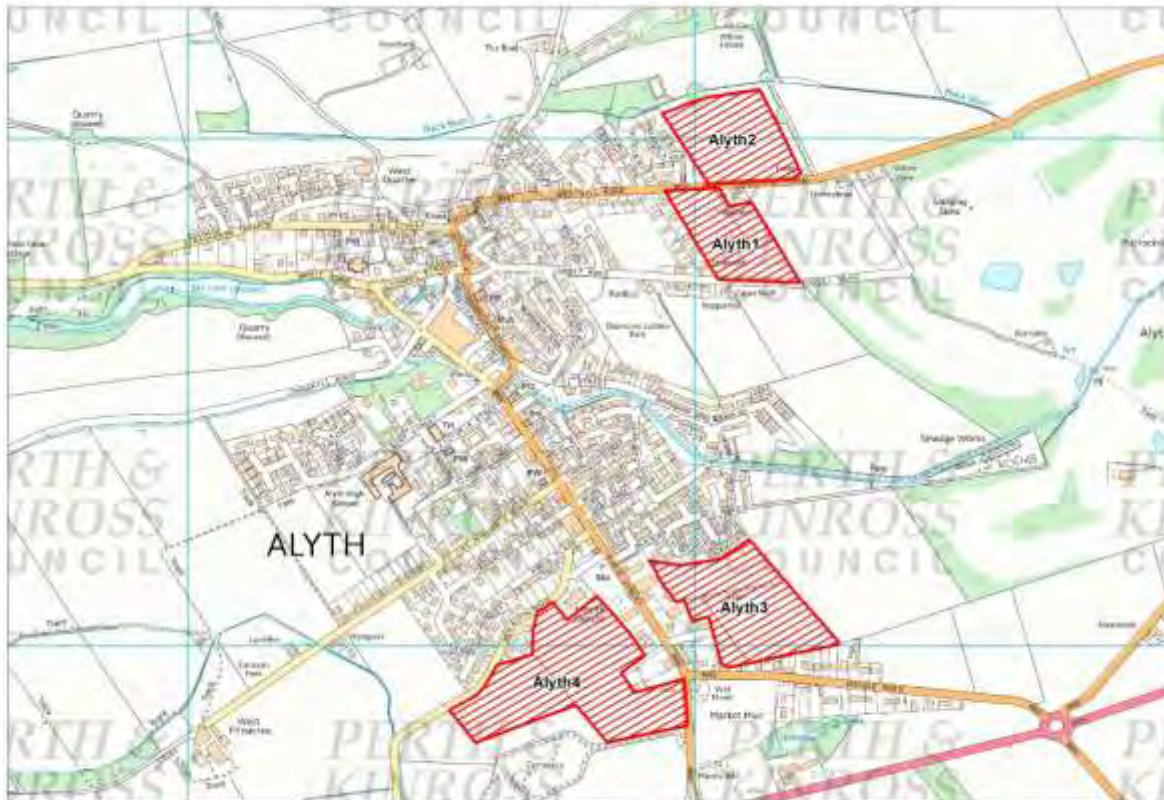
One site was suggested for housing on the eastern edge of the settlement (St David's 1). The site is outside the settlement boundary and since it is suggested for five or fewer units, an amendment to the settlement boundary is suggested instead of an allocation. The settlement boundary was adjusted in the last LDP to allow limited development along this edge.





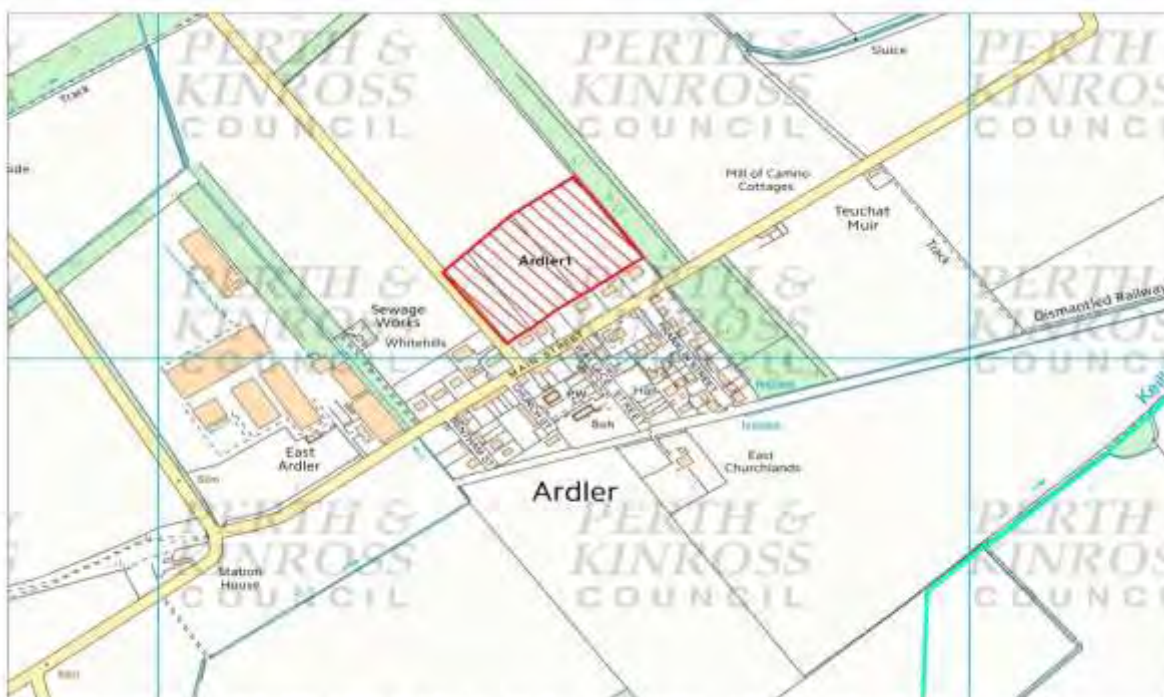
## STRATHMORE HMA

**Alyth and New Alyth** - Proposals for four new residential sites within Alyth at the following locations – north of Meethill Road (Alyth2), South of Meethill Road (Alyth1), Banff Road (Alyth3) and South of Health Centre, New Alyth Road (Alyth4). There has also been a submission to request an extension to the current H61 allocation in New Alyth to ensure this development site remains viable – increasing units from 20 to 50.



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**Ardler** - A proposal for a residential site to the north of the village (Ardler 1), included in our previous MIR (2010). Previously considered for 20 units.



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**Blairgowrie and Rattray** - Long standing issues with sports and community facilities and the need for these to be upgraded, ideally through the provision of a multi-functional facility and large recreational park. Support for Town Centre regeneration and engagement workshop to create a vision for the future of Blairgowrie. There is a need to improve employment opportunities and encourage economic growth, more aspirational opportunities for the town.

There have been 6 proposals put forward within and around the green space in Rosemount. These have generally been to alter the open space boundary to enable small scale residential development (Blairgowrie 1, 7, 8, 9 & 10). A proposal likely to be a care home has also been put forward (Blairgowrie 5), which previously had a planning application refused. The current open space boundary has not been drawn consistently around each property which needs to be reviewed.

Proposal for long term residential site at Rosemount Farm (23ha) (Blairgowrie 2).

Suggestion of willingness to work with Council to facilitate access over their land (Blairgowrie 3) to land outwith their ownership to the north if this land is deemed suitable for residential development.

There has also been a proposal for an educational/ retail/ tourism development to the south of Blairgowrie, requiring a small extension to the settlement boundary (Blairgowrie 4). *(This site conflicts with residential proposal at Rosemount Farm).*

Proposed residential development and settlement boundary extension to the East of Old Military Road (Blairgowrie 6). Long term planting has been carried out to screen the site. Potential access issues.

Proposal for low density residential site off Woodlands Road.(1.3ha) (Blairgowrie 11).

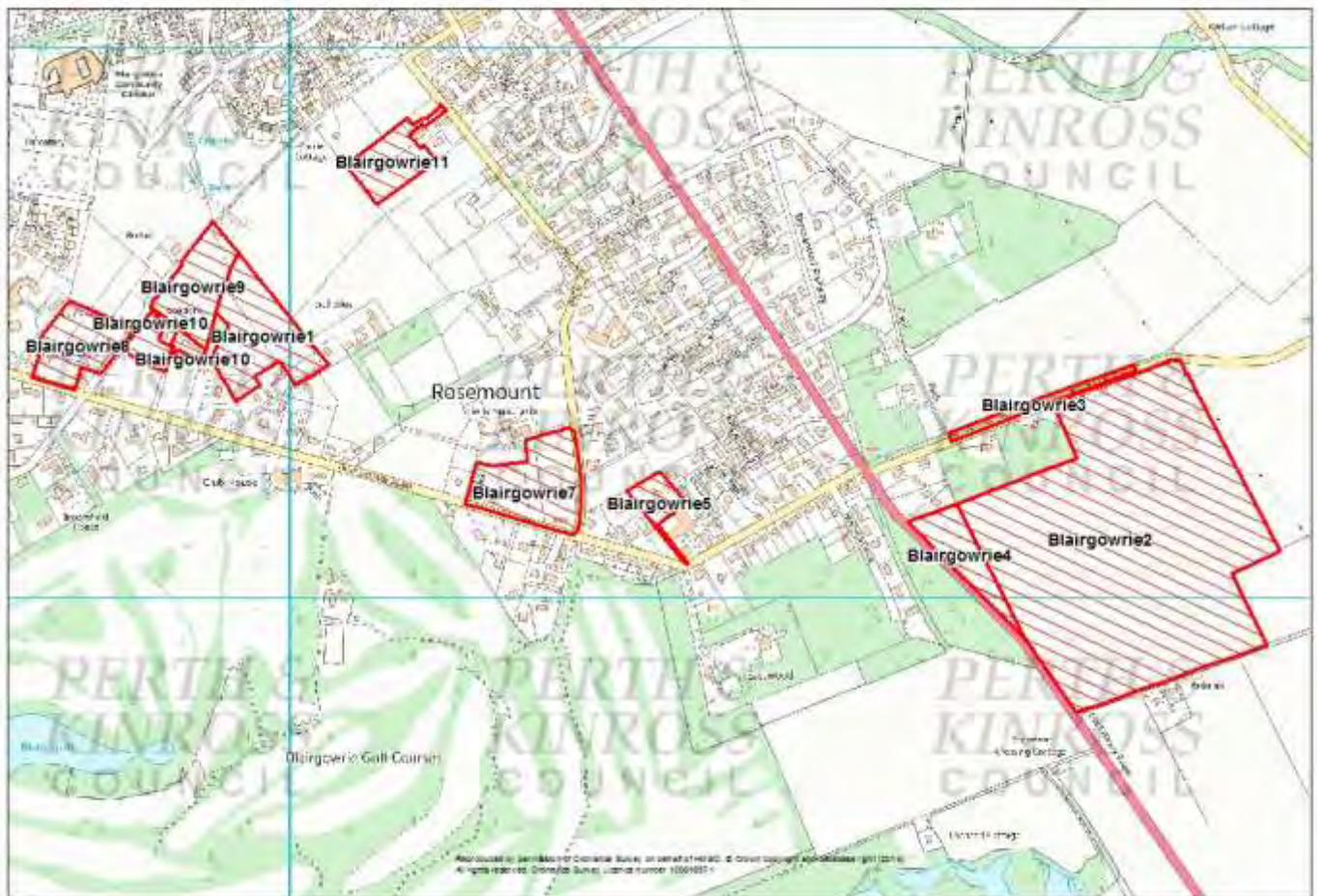
Proposal for a mixed use development (Rattray 1) requiring an extension to settlement boundary in Rattray – this brownfield land was previously identified as an opportunity site in Draft Eastern Area Local Plan (BO2). Currently derelict agricultural steadings on the site.

Proposal for residential/ mixed use site (17ha) on Ashgrove Road, south east of Rattray (Rattray 2). Proposal for mixed use site on former textile mills site (Rattray 3).

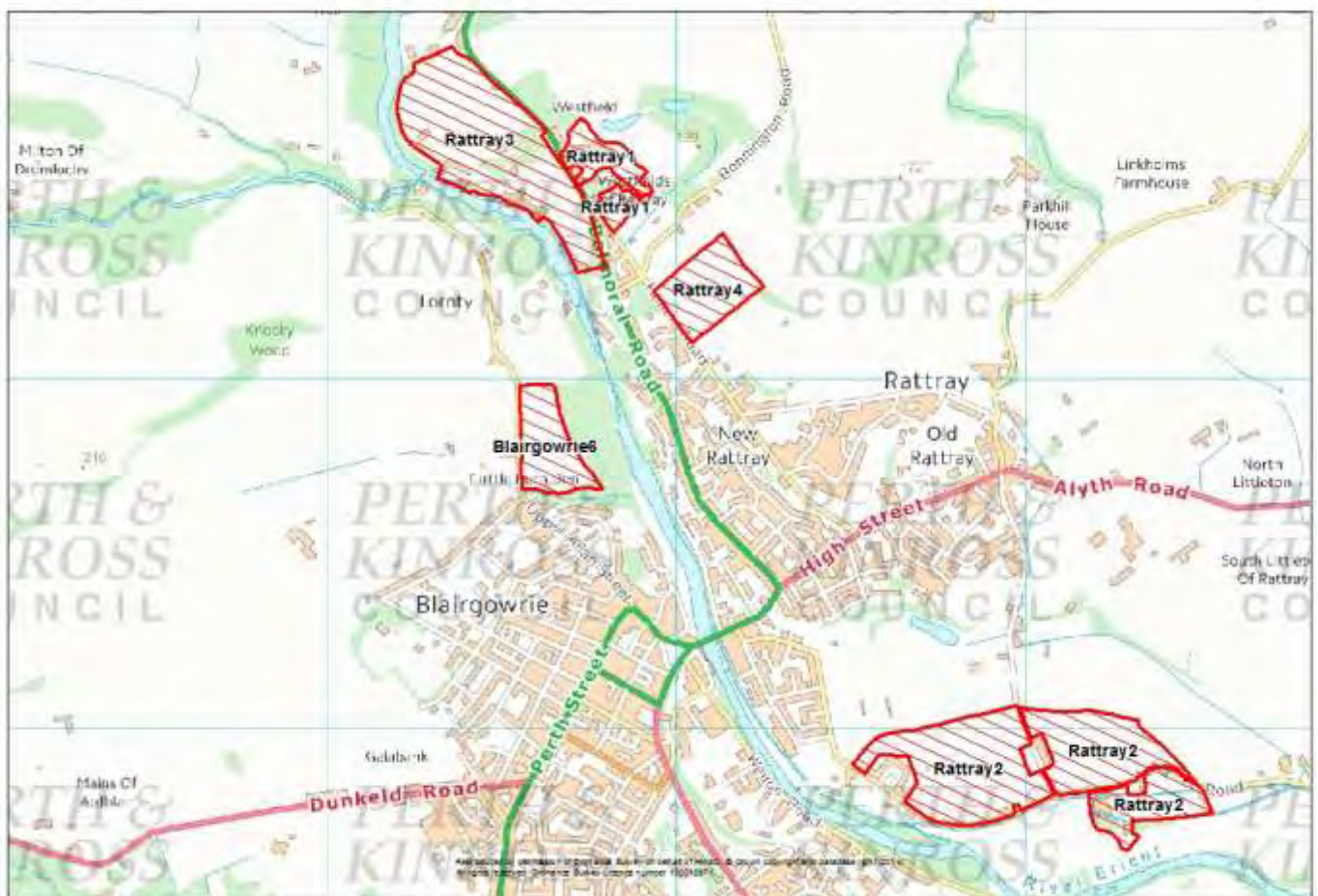
Proposed residential site at Hatton Road, Rattray (Rattray 4) which is adjacent to settlement boundary.



## Blairgowrie South

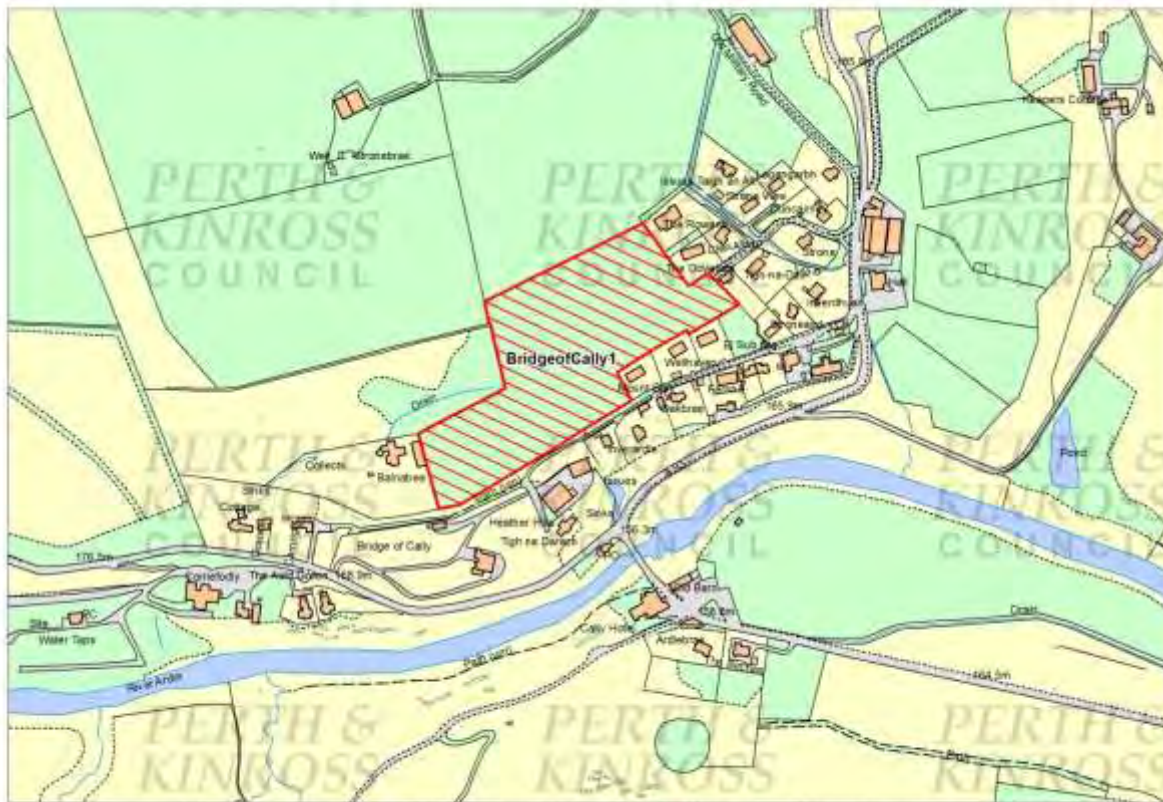


## Blairgowrie North



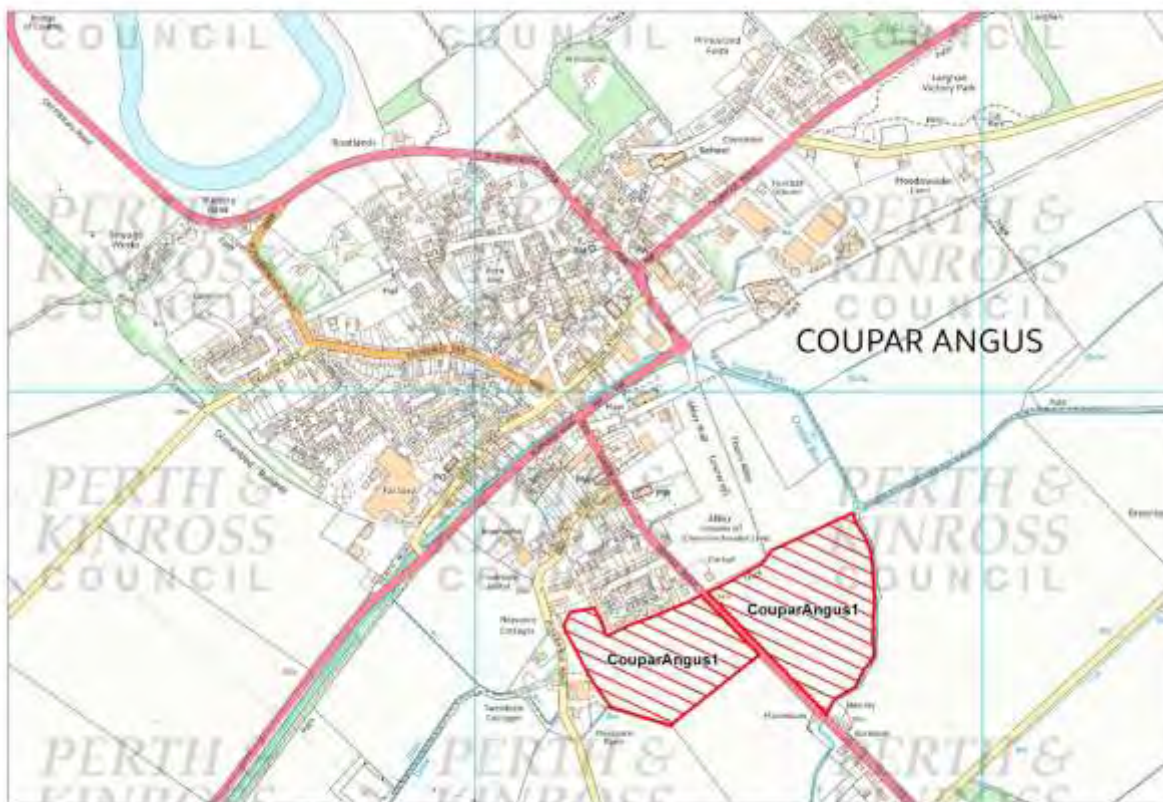


**Bridge of Cally - Proposal for a site of 3.4ha for residential use (Bridge of Cally 1).**



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**Coupar Angus - Proposal for new residential site to the south east (13.05ha) (CouparAngus1).**



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## Meikleour

Proposal for residential site for 12 houses, including 3 affordable houses which would be managed by Meikleour Trust (Meikleour 1). Site within the Conservation Area to the east of settlement and would attempt to join the settlement as a whole.



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**Strathmore Landward Area:** The following proposals / comments have been put forward for specific settlements / areas within the landward area:

Various issues in and around the Mount Blair area all concerned with lack of development opportunities – lack of employment sites; poor broadband, telephone and public transport provision. Education contributions are making any development unviable.

Feeling that rural communities such as Strathardle and Glenshee have been overlooked in current LDP and attention should be paid to their future.

**Campmuir** - Proposal for mixed use site (residential and local businesses) at Campmuir (Campmuir 1), incorporating low density housing or single plots.



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**Enochdhu** - Proposal for mixed use site at Enochdhu (Enochdhu 1) including a district heating system to increase sustainability in the area.



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## ISSUES

This section is set out following the format of the Call for Issues form which asked a series of questions. Questions 1-4 related to details of those making the submissions and are not relevant for the purposes of this report.

**Q4.** Our neighbourhoods and buildings should be planned and designed to cope better with bigger ranges of temperature and rainfall. We need to plan for more rain and greater flood risk, as well as possible drought in some years. Do the Environmental Protection and Public Safety policies EP1 & EP2 (and associated Supplementary Guidance) of the existing LDP adequately address this issue?

6 respondents answered yes, 6 said no, and 11 didn't know.

**General comments** – A number of varied submissions received as follows: the Supplementary Guidance (SG) should cover minimising vulnerability to flooding; more consideration is needed to designing in protection from high winds; SG needed on Environmental Impact Assessment; concern that the Building Standards Technical Handbooks Section 7 may be out of date for use in the LDP; policies adequately address climate change issues but all emerging policy needs to be reviewed to ensure conformity with SPP; concern that the current LDP lacks policy on solar photovoltaic and whether this is acceptable in the Green Belt; and the suggestion that better use should be made of open spaces – a specific site north of Aberuthven suggested for community woodland, allotments and a hydro scheme.

**Policy EP1: Climate Change, Carbon Reduction and Sustainable Construction** – Several changes to the policy suggested: the policy should be reviewed to ensure conformity with SPP; the policy should be strengthened in relation to peatland to reflect SPP and these areas should be spatially represented in the LDP; the policy should make reference to available mapped data sources; the different types of solar panels should be referred to and the contribution they can make to the National Grid (policy ER2 could also refer to solar panels); and the Bronze standard needs to be removed with future applications required to meet silver standard by 2016 but that we should be aiming for the gold level. A further submission suggests that the policy should require a gold sustainability level for new domestic buildings or BREEM level 5 for non-domestic buildings.

On the SG it is suggested that it should be expanded or additional SG prepared to include an explanation of the requirements for renewable and low carbon energy generating developments and where CHP may be appropriate. Lastly the policy, SG and Sustainability Checklist should be revised to protect soils.

**Policy EP2: New Development and Flooding** – Several changes to expand or strengthen the policy are suggested: the policy should be reviewed to ensure conformity with SPP; the policy wording should be changed to strengthen the commitment to the policy principles; there should be a commitment to ensure that undeveloped land behind flood protection schemes is not redeveloped in areas at risk of flooding; the policy should recommend that the redevelopment of any previously developed land is limited to equal or less vulnerable use; and LDP2 should the protection and management of areas of unspoilt coast.

**Q5.** People's health and wellbeing directly affect their quality of life. The existing LDP has policies aimed at improving people's quality of life. These include, for example Placemaking (PM1 & PM2) and Green Infrastructure (NE4). Do you think these policies and the associated Supplementary Guidance (currently only available for Green Infrastructure) need improving?

6 respondents answered yes, 7 said no, and 11 didn't know.



**General comments** – Two submissions expressed support for the policies. Other comments were as follows: there is insufficient recognition of health and air pollution – good air quality should be recognised as an element of sustainable placemaking which contributes towards health and well-being; better use should be made of public open spaces; and there should be an emphasis and support for facilities which use the area's resources to provide local produce to assist in supporting health and well-being.

Two specific proposals were also suggested; one for a site North of Aberuthven for community wood, allotments and hydro scheme; and one that the pedestrian / cycle bridge from Isla Road to North Inch should be reconsidered.

**Policy PM1: Placemaking** – Comments suggested that: the new LDP should lead through context-led spatial planning for Strategic Development Areas, Design Frameworks, and other masterplan areas; that the Placemaking Guide will be a key mechanism for clarifying requirements; that the Scottish Government's 'Creating Places' needs to be integrated into LDP policies; and that Policy PM1B should make specific reference to connections to blue networks. One respondent also expressed concern at the style of housing which is being allowed in rural areas.

**Policy NE4: Green Infrastructure** – Green Infrastructure Supplementary Guidance generally welcomed but its geographical coverage should be extended and more detail given in the maps. There should be also be a greater emphasis on support for tourism and leisure in the SG as this will help create infrastructure for recreation and active travel. LDP2 should show proposed and existing green networks on settlement maps and should show links between West / North West Perth and the city centre as strategic green networks.

**Q6.** Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and businesses?

6 respondents answered yes, 9 said no, and 10 didn't know.

**General comments** – Some support for the policy group was expressed. One submission was concerned that there is a lack of flexibility for businesses based on existing employment sites whilst another suggested the designation of small business estates in landward areas would help provide employment closer to homes. The need for a rural brownfield employment land policy was suggested. Several other submissions referred specifically to tourism-related development commenting that this should be supported and considered favourably in appropriate rural locations, that LDP2 should provide policy context which encourages business diversification and increases tourism spend, and that the status of the Tourism Development Framework and associated Regional Action Plans should be highlighted.

**Policy ED1: Employment and Mixed Use Areas** – One submission supports policy ED1C to protect the Motor Mile. A second is generally supportive but considers that when existing sites come to an end e.g. quarrying they should be able to be identified for other land uses. Other respondents consider that some policy rewording is required to make it less restrictive re compatibility with surrounding land uses; that clarification is needed on policy ED1A as to whether it applies to allocated areas or to existing and proposed; and that policy should be more flexible and allow for some retail.

**Policy ED2: Communications Infrastructure** – One comment which proposes a telecommunications policy.

**Policy ED3: Rural Business and Diversification** – One respondent considers that the policy should be more explicit in its support for mainstream residential to provide on-site accommodation



or as a source of capital whilst a second considers the policy needs careful cross-referencing with policies RD1 and RD3 re mainstream housing. The policy should more explicitly support destination niche retailing.

**Policy ED4: Caravan Sites, Chalets and Timeshare Developments** – Comments submitted were: general support but policy ED4Ca is overly restrictive; revision required to support new chalet projects not just existing; and concern that the definitions could lead to timeshare / fractional developments becoming permanent residences.

**Policy ED5: Major Tourism Resorts** – One submission in support.

**Q7.** Do the existing LDP policies (ED1-5) adequately encourage new employment sites and businesses?

8 respondents answered yes, 9 said no, and 10 didn't know.

**General comments** – Some support but other respondents considered the policy could be more flexible; it should encourage business diversification and facilitate increased tourism spend; that more emphasis is needed on development of businesses in rural areas and small towns, and that strategically important economic development sites should be identified as clusters.

A new policy on Visitor Accommodation proposed and a second sought on Economic Development at Strategic Transport Infrastructure Sites.

A further respondent commented on the number of empty and unused commercial sites in Aberuthven.

**Policy ED1: Employment and Mixed Use Areas** – The Spittal of Glenshee hotel site should be identified for employment uses.

**Policy ED2: Communications Infrastructure** – No comments.

**Policy ED3: Rural Business and Diversification** – Some support but more explicit support needed for destination niche retailing, and the policy should be more explicit in its support for mainstream residential to provide on-site accommodation or as a source of capital. Concerns also raised that staff travel plans not adequately enforced, and that greater specification of road network capacity is needed to identify where upgrades are required or to steer development to locations with capacity.

**Policy ED4: Caravan Sites, Chalets and Timeshare Developments** – Specific policy needed on camping pods and other innovative forms for camping and caravanning.

**Policy ED5: Major Tourism Resorts** – No comments.

**Q8.** New Government Guidance aims to strengthen the role of Town Centres. Do you consider the existing policies in the LDP (RC1-4 and RD2) already support vibrant city and town centres?

7 respondents answered yes, 5 said no, and 9 didn't know.

**General comments** – One submission in support. A second considers the retail and other floorspace should be permitted outwith the town centre, and that smaller centres should not be constrained but instead that local considerations in a regional context should be key.



**Policy RC1: Town and Neighbourhood Centres** – Emphasis needed on developing brownfield sites before greenfield.

**Policy RC2: Perth City Centre Secondary Uses Area** – One submission in support although the need to protect residential amenity should be stated.

**Policy RC3: Commercial Centres** – No comments.

**Policy RC4: Retail and Commercial Leisure Proposals** – One respondent notes support for prioritising sequential testing whilst a second raises the concern that the policy does not allow for niche retail opportunities specific to the visitor tourism market.

**Policy RC5: Retail Obligations and Controls** – Potential inclusion of a statement of financial viability and sustaining businesses suggested.

**RD2: Pubs and Clubs – Residential Areas** – One comment in support.

**Q9.** Do policies RD1-6 provide a satisfactory framework for consideration of residential development within Perth & Kinross?

5 respondents answered yes, 15 said no, and 7 didn't know.

**General comments** – A number of respondents commented on the spatial strategy: a need for a more balance approach in land allocations between sub areas; further review and its direction required on the strategic nature of settlements across P&K and where growth should be focussed; the housing allocation within the Greater Dundee Housing Market Area (HMA) is much more constrained than that within the Perth HMA – LDPs needs to contain more detail on such issues; and LDP2 should clarify that new housing development should be in and around existing settlements.

Some support was expressed for the residential policy group. Other general comments were as follows: policies do not provide for the full range of housing opportunities and development types; development frameworks should protect residents' amenity, prime agricultural land, and the landscape against inappropriate development; there should be no development adjacent to plan boundaries; brownfield sites should be developed before greenfield; development of villages should be more concentric than linear; planning requirements should be detailed and precise rather than developer driven; it should be acknowledged that windfall sites contribute significantly more than 10% in Portmoak and the impact this has on infrastructure; infrastructure requirements, including water and drainage, should be assessed to enable development to take place in appropriate areas and that capacity is available; current allocations may not deliver as anticipated and previously considered sites should be reconsidered, specifically West Kinross; and a concern that Auchterarder is reaching saturation point.

One submission suggested that LP2 should contain a map showing boundaries and allocated sites for P&K and settlement maps for each HMA, and another expressed concern at the incompatibility of data units used with settlement or HMAs.

**Policy RD1: Residential Areas** – One respondent expressed support for this policy.

**Policy RD2: Pubs and Clubs – Residential Areas** – No comments.

**Policy RD3: Housing in the Countryside** – The most comments under this question were submitted on policy RD3 (12 comments). Respondents seeking a relaxation of the policy commented: the policy and associated supplementary guidance (SG) are overly-restrictive –



housing should be allowed on non-productive agricultural ground within existing farms; the siting criteria within section 3 of the SG requires revision especially regarding the sub-division of land; appropriate flexibility is needed to deliver the best planning outcome rather than a strict adherence to the SG – specific reference to category 6 brownfield land; policy should apply within the Green Belt; and the SG needs to be revised in line with SPP and PAN72 – clarity sought on the policy on steading conversions and redevelopment of farm buildings.

A number of respondents either supported the policy or considered that it should be strengthened further: the definition of gap infill or grouping should be tightened and enforced; concern that the policy on the replacement of existing dwellings is being very liberally interpreted; policy should be revised to include reference to all relevant national and international sites; SG should be clear that artificially creating a site in an otherwise open area will not be permitted; and policy wording needs to be strengthened to help retain farm buildings in agricultural or other employment use.

**Policy RD4: Affordable Housing** – Varied comments; need for more robust wording re commuted sums and publication of developer contributions and agreements; policy does not translate into a balanced supply of affordable housing in smaller rural areas; affordable housing should always be separate from market housing; social housing should be in where there are adequate facilities not in small rural areas; and the requirement for affordable housing should be removed in the conversion of traditional buildings due to the cost of these.

**Policy RD5: Gypsy / Travellers' Sites** – Comments all relate to the Kinross-shire area. Comments made both for and against further traveller sites and one request for the policy to be reviewed.

**Policy RD6: Particular Needs Housing Accommodation** – Policy welcomed but one respondent suggested it should be broadened to include retirement villages.

**Q10.** Given the Government's demanding legal targets to reduce Greenhouse gas emissions by at least 80% by 2050, with an interim target of 42% reduction by 2020. Do the Environmental Resources policies ER1, Transport policy TA1 and Climate Change, Carbon Reduction and Sustainable Construction policy EP1 of the existing LDP need updating to enable Perth & Kinross to fulfil its obligations in this respect?

4 respondents answered yes, 6 said no, and 11 didn't know.

**General comments** – One submission suggests further enhancement of the road network east of the Tay in addition to the CTLR, and suggests that Stormontfield Road, the A93 and A94 should also be improved to maximise the benefit of the CTLR.

**Policy ER1: Renewable and Low Carbon Energy Generation** – Several submissions call for additional and / or improved policy and guidance: need for proper policy and guidance on windfarms and small scale wind energy developments – the spatial framework for wind energy developments should be completed urgently; policy is required on large scale solar farms; carbon rich soils, deep peat and priority habitat should be included in the policy; the repowering and decommissioning of wind farms should be considered to see if any further policy on this is needed; and the LDP should provide further policy and guidance on preventing pollution incidents during the construction of run-of-river hydro schemes.

Further comments include: a need for clarity as to how policies ER1, TA1 and EP1 will contribute towards meeting Scottish Government targets; the consultation on new SNH Guidance 'Spatial Planning for onshore wind' should be included in supplementary guidance in the new LDP; and a specific proposal is suggested for a hydro scheme in Aberuthven which would assist CO2 reduction.



**Policy ER2: Electricity Transmission** – One submission comments that the upgrading of the high voltage electricity transmission network is a national development in NPF3 and suggests that mitigation corridors, stand-offs and implications of this for local development should be addressed in the LDP.

**Policy ER5: Prime Agricultural Land** – One comment that too much green land is being allocated for housing.

**Policy TA1: Transport Standards and Accessibility Requirements** – Several policy amendments or new policies suggested: the policy should include reference to carbon free transport and support for charging infrastructure; policy TA1B should be amended to require new developments to reduce traffic; there should be less restrictive car parking standards applied to developments for frail, elderly and special needs housing; a policy statement is needed on the development implications of upgrades to the rail network; and a policy is needed on the development implications of the CTRL.

Other general comments include: a need for more guidance on the requirements for Transport Statements; Travel Plans should be required for all developments over a set threshold; the number of railway stations should be increased as should existing station parking and park & ride facilities; need for more consideration to the access demands in new developments in rural villages and hamlets; there should be more guidance to address the lack of parking and inconsiderate parking; and more cycling and walking paths are needed.

Specifically in relation to Kinross-shire it is suggested that car parking provision should be reviewed when considering developments in Portmoak; there is a need for zoned parking areas in particular settlements; and HGVs should be directed away from certain roads in Kinross-shire in particular the A911.

**Policy EP1: Climate Change, Carbon Reduction, and Sustainable Construction** – SEPA make a number of comments: they require the inclusion of policy wording which supports the construction of low carbon energy distribution district heating networks in accordance with SPP; site specific developer requirements for the strategic sites should be strengthened to require the site to connect to an existing or proposed district heating network or provide a heat network within the site and the policy should require that any development which comes forward adjacent to existing or proposed heat networks is designed to be capable of connection to the supply; a heat map should be created for P&K to identify opportunities to facilitate and safeguard potential heat connections, energy hubs and heat network pipelines; and the Sustainable Design and Zero Carbon Development Supplementary Guidance (SG) should cover low carbon heat networks. Lastly they comment that the lack of SG on the requirements for renewable and low carbon energy generating developments and where CHP technologies may be appropriate may be detrimental to the implementation of policies ER1 and EP1 on individual sites.

**Q11.** Existing policy ER3 of the LDP already aims to protect natural resources from development. How should the new LDP manage the issue of shale gas extraction (“fracking”) and coal bed methane extraction?

**Q12.** Are other Natural Resources adequately protected by the LDP policies (ER3)?

In response to Q12, 3 respondents answered yes, 1 said no, and 10 didn’t know.  
NB – there was no tick box for Q.11

**General comments** – One respondent seeks the prior extraction of coal resources where they could be sterilised by new development. This same respondent suggests that the LDP should

include a policy framework for addressing unstable land generally rather than just for specific sites, and that it should include areas of search for surface coal extraction – concern that because P&K is outwith any areas of search in the SPP this could be used to resist any coal extraction. A second respondent suggests that any application for fracking should be examined by Council appointed independent experts for environmental issues and impact on communities.

**Policy ER3: Minerals and Other Extractive Activities – Safeguarding** – Two submissions in support of the current policy although this is providing that potential adverse impacts on the environment and local communities is managed or mitigated. It is also suggested that policy ER3A should protect possible future economically viable workable mineral deposits not just current ones.

**Policy ER4: Minerals and Other Extractive Activities – Supply** – One respondent offers support for appropriate Development Management criteria including the requirement for restoration. This same respondent considers that the LDP should identify PEDL133 and 163 areas and a policy framework for energy minerals either within Policy ER4 or in a separate policy. A number of comments were received on new sources of energy including fracking and coal bed methane extraction. One respondent suggested these new sources of energy should be promoted whilst another sought specific supplementary guidance on fracking and related extraction activities. SEPA advise that policies on fracking and coal bed methane extraction should be consistent with their Development Plan Guidance on water, air and soils and should include policy wording that protects the water environment

**Q13.** Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately protect and promoted green and blue networks?

7 respondents answered yes, 11 said no, and 7 didn't know.

**General comments** – Some support expressed but other submissions sought additional policy protection for: Loch Leven – no development should be permitted within the catchment without advance remediation measures; Local nature conservation sites which are considered to be underrepresented – a methodology should be developed with Tayside LBAP to review and identify sites in line with SPP; and the Inner Tay Estuary – the LDP should include a specific policy on this area. One respondent considered there is a greater need to reflect the diversity of population within P&K, and lastly a site is proposed north of Aberuthven for community wood and allotments which the respondent considers would help protect and promote green and blue networks.

**Policy NE1: Environment Conservation Policies** – Three submissions made: firstly that the policy should be reviewed together with the local designation of the upland area coterminous with the Fife Regional Park; reference made to the Living Lomonds Landscape Partnership in Fife which also influences parts of Portmoak. Secondly the Council should reconsider its stance on the loss of the Cleish Hills and River Devon AGLVs. Thirdly Crook Moss should be identified as an SSSI.

**Policy NE2: Forestry, Woodland and Trees** – One submission that LDP2 should identify trees and woodlands where nature conservation is of primary importance.

**Policy NE3: Biodiversity** – No comments.

**Policy NE4: Green Infrastructure** – Comments as follows: rural enterprises should be included in the list of uses in criteria (c) of the policy; the Supplementary Guidance should highlight soil as a resource key to delivering the benefits of green infrastructure and networks; and existing and proposed green networks should be incorporated into local settlement maps in LDP2, blue networks should also be defined.



**Policy NE5: Green Belt** – Submissions seek changes or raise concerns with the policy. Firstly, that the Housing in the Countryside policy RD3 should be applicable within the Green Belt and that the policy should give support for appropriate forms of renewable energy. Secondly, concern that the Green Belt designation is unhelpful and unwieldy. Specific concerns raised in this submission include a lack of need for a Green Belt around Scone and the restrictive nature of the policy. A special designation for Scone Palace and Estate based on a masterplan as a management tool suggested as an alternative. Thirdly, concern that the Green Belt aims listed in the notes are potentially contradictory and there is no indication which, if any, take priority.

**Policy NE6: Perth Lade** – Two submissions suggested that Perth Lade should be considered as an SSSI.

**Q14.** Have we missed any land use planning issue which you consider the revised LDP2 should cover? Plus, comments not submitted on 'Call for Issues' form.

17 respondents answered yes, 4 said no, and 4 didn't know.

A variety of comments were made under this question and these have been recorded either under a specific policy or, for more general comments, under the appropriate policy group.

**Policy PM3: Infrastructure Contributions** – Provision should specifically allow for potential contribution towards strategic infrastructure, including that which serves cross-boundary travel demand and needs identified within the Regional Transport Strategy.

**Policy PM4: Settlement Boundaries** – Policy should be reviewed; some development adjacent to the settlement boundary can support development of infrastructure which may benefit the whole community. Another submission suggested that the policy should be reinforced whilst allowing for exceptions on grounds of community benefit.

Several submissions expressed concern at the loss of some settlement boundaries in the current LDP, particularly in Kinross-shire. Suggested that settlement boundaries should be reinstated; small communities need some certainty as to their boundaries and there is a risk of unauthorised development on the edge of settlements unless policy RD3 is robust and enforced. Similar issues expressed re small settlements in the Carse including risk of further pressure as a result of the green belt designation.

**Economic Development Policy Group** – Land west of the M90 should not be developed whilst existing sites remain undeveloped; this is an opportunity to clarify the retention and status of Turfhill Environment / Roads depot.

**Residential Development Policy Group** – Numerous general comments were made as follows:

- there is a need for more single occupancy and retirement housing to buy or rent, thus releasing larger homes for families;
- small sites can make a useful contribution to meeting housing need and help provide range and choice;
- the spatial strategy should clarify the smaller settlements not listed in the 3 tiers can be considered as buildings groups under policy RD3;
- Need in LDP2 for a range of housing sites in terms of size and tenure;
- question as to whether the provision of housing land will be increased further in LDP2 as there is already a considerable amount of land which has not been taken up due to the economic climate;
- current LDP does not provide sufficient housing land to meet demand; and

- policy support is needed for housing for essential local residents; since Section 75 agreements are no longer used a new farm house must comply with current guidance on siting and design and this may preclude a house outwith a settlement.

In addition a number of comments were made relating to specific areas or settlements as follows:

- there are a range of small settlements within Scone Estate which could support some small incremental growth but clarification is required of the policy position;
- rural Kinross-shire currently has 50-55% windfall sites and continuation of this is unsustainable as there is no provision in the infrastructure for this additional development;
- small scale windfall development opportunities should be allowed in villages and smaller settlements in Highland area;
- the work of the Fossoway Community Strategy Group should be acknowledged in the Kinross spatial strategy section and the finalised maps for Blairingone, Crook of Devon, Powmill and Rumbling Bridge should be revisited;
- support for the reinstatement of the Development Zones for Glenshee and Strathardle as previously included in the Draft Eastern Area Local Plan as small scale sustainable development required in the area to sustain local services;
- a new settlement suggested at Burnside of Monorgan within the Carse of Gowrie to alleviate longstanding issues;
- recognition should be given to the potential of the Carse to act as an exemplar for sustainable development; LDP2 should build on the existing networks and recognise that active and sustainable travel should be explicitly encouraged to strengthen connectivity and future-proof the area as one where development can be undertaken after the current strategic development areas have been completed or alternatives are sought.

**Transport and Accessibility Policy Group** – Measures to improve cycling infrastructure around Perth should be included within the ‘Transport Infrastructure’ section of the Perth Area Spatial Strategy in accordance with NPF3. Errol is suggested as an exemplar settlement for walking and cycling. Also, the M90 over the Friarton Bridge should be re-classed as an A road for better traffic management and support is expressed for a bypass from Longforgan to Tealing.

**Policy CF1: Open Space Retention and Provision** – LDP2 should be informed by an up to date open space audit and strategy; open space, sports pitches and parks should be shown on the key to the proposal maps; and requests for contributions under CF1 must be based on the tests in Circular 3/2012.

**Policy CF3: Social and Community Facilities** – Support expressed but a definition should be included as follows: ‘social and community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.’ A further submission suggests the policy should be expanded to include areas such as Conservation Areas or areas which affect village settings.

**Policy HE2: Listed Buildings** – It is vital that new uses are found for redundant traditional buildings of historic merit and the policy should state that there is support for new uses to keep listed buildings in active use. It is also suggested that new conservation areas be considered for Back Crook, Keltybridge / Maryburgh and Milnathort.

**Policy HE3: Conservation Areas** – Support expressed although the policy should be applied more rigorously.

**Policy HE5: Protection, Promotion and Interpretation of Historic Battlefields** – Support for the preservation of the Battlefield of Tippermuir.



**Natural Environment Policy Group** – Specific policy protection for Wild Land should be included in LDP; and the policy framework for the Tayside Geodiversity sites is not explicit enough in the LDP.

**Policy ER5: Prime Agricultural Land** – A number of comments seek stronger protection for prime agricultural land. Concerns are raised that good agricultural land is used for housing and it is suggested that all prime agricultural land must be retained for long term use to help reduce future dependency on imported food.

One respondent suggests that the policy should set out a hierarchy of categories of agricultural land capacity and state the circumstances under which the policy of protecting prime agricultural land may be breached and how mitigated. A further submission suggests that the MacAuley Land Use maps are too broad brush; if investigations show that specific areas being considered for development are not prime land then the policy should not apply.

**Policy ER6: Managing Future Landscape Change to Conserve and Enhance the Diversity and Quality of the Area's Landscapes** – The policy needs updated together with Policy NE1C in line with SPP. A second respondent comments that the Landscape needs to be preserved for future generation; the presumption against windfarms in all designated areas is welcomed. A third issue identified is the loss of the AGLV designation from the Naemoor area in Crook of Devon and the Council's decision not to extend the Local Landscape Areas to include the Cleish Hills, River Devon Gorge, Lochleven, Ochil Hills and Portmoak. This should be reconsidered.

**Policy EP1: Climate Change, Carbon Reduction and Sustainable Construction** – The policy wording regarding sustainable construction should be expanded to promote the minimisation of waste generation from the construction phase of development; the policy for windfarms should be tightened further and there should be a presumption against granting permission in any areas designated as a Special Landscape Area; additional policy and guidance is required for wind turbine development; and there is a need for a policy on solar PV projects to be included in LDP2.

**Policy EP2: New Development and Flooding** – The SUDS policy should be amended to reflect the other multiple benefits SUDS can achieve.

**Policy EP4: Health and Safety Consultation Zones** – Full recognition should be given to existing oil and gas pipelines and any proposed development in proximity should consult HSE.

**Policy EP6: Lunan Valley Catchment Area**

**Policy EP7: Drainage within the Loch Leven Catchment Area**

**Policy EP15: Development within the River Tay Catchment Area**

SNH support the inclusion of these policies in the new LDP although there is a need to review how well they are working. It is also suggested that EP6 criteria a) may be better addressed through the development in the countryside policy.

In relation to Loch Leven specifically a further submission suggests that the Loch Leven Basin should be protected in its entirety and the following should not be permitted: buildings over 2 storey, masts over 3m, wind turbines, industry, fracking within 20km.

**Policy EP9: Waste Management Infrastructure** – Policy EP9A should allow for the safeguarding for expansion of land surrounding existing facilities; and policies should identify the preferred means of waste management for all waste and the types of waste management facilities that will be supported.

Policy EP9B part (I) could be expanded to provide additional opportunity to work towards achieving greenhouse gas reduction targets through allowing provision of development of heat

networks. Policy wording could facilitate the inclusion of the connections on appropriate waste management sites to permit the heat source to join an existing or future heat network.

**Policy EP13: Airfield Safeguarding** – Policy is welcomed but some recent planning decisions around Portmoak raise concerns – reassurance sought that the gliding facility there will not be compromised.

**General comments** – a range of comments were made which do not relate to any particular policy or policy group. These were as follows:

- the LDP has areas and sites for development but has no strategies for developing tourism; public transport and roads; reducing traffic congestion; addressing parking problems; improving air quality; protecting green belt; incorporating charrette outcomes; development of sustainable power sources; and competing with Dundee for economic growth
- this is a good opportunity to examine allocated employment, housing and opportunity sites and ensure they are deliverable;
- The current Vision statement is bland, verbose, uninspiring, non-quantifiable and has no meaning;
- the LDP fails to set out a statement of the critical opportunities and challenges to be tackled;
- the LDP aims and policies need to be better articulated;
- the procedures and standards in the LDP should be set out in a separate document that is updated whenever legislation or standards change which will make it clearer whether any of the standards conflict and whether there should be a hierarchy; and
- there should be comments made on failures within the Action Programme to ensure issues are addressed, projects are started and completed.

A number of comments were also made on the Call for Sites / Issues process and procedures:

- the website does not perform adequately; hyperlinks in the forms work but the website does not respond which is frustrating and affects ability to comment meaningfully on many aspects;
- some interest groups who made submissions to LDP1 were not informed of the Call for Issues consultation;
- concern that the Call for Issues form has an over-concentration on policy principles – primary concern should focus on understanding local needs and wherever possible meeting them. advocates community-led planning approach; PKC should comply with legal requirements on planning and development but there is no need to set additional policies or seek opinion on such issues; genuine community engagement should be focused on strategies for business, tourism and leisure, city and town centres, residential development and green / blue networks; and
- clearer information should be available on the website as to what will and will not be allowed.

**Q15.** Does the existing LDP have the right balance between policies and supplementary guidance (SG), and does the SG cover the right topic areas?

6 respondents answered yes, 8 said no, and 9 didn't know.

**General comments** – Three general comments. Firstly the development of SG takes too long after LDP issue with specific reference to the AGLV replacement SG. Secondly some SG needs to be transferred into policy in LDP2. Thirdly the current system of policy and SG is disorganised and needs improving.



**New Supplementary Guidance** – Four new pieces of SG suggested. Firstly SG is required on wind turbines. Secondly, SG is urgently needed on Historic Environment Policy and conservation needs to be strengthened. Thirdly SG is needed on the settlement hierarchy and a revision to tier 1 settlements is required. Lastly there is a need for stronger guidance on small housing sites e.g. planning gain requirements.

**Existing Supplementary Guidance** – Comments were made on the following pieces of existing SG:

Transport Infrastructure Developer Contributions – This should be based on Travel to Work and retail catchment areas rather than housing market areas to more accurately reflect traffic generation.

Employment and Mixed Use Areas – Doesn't give sufficient support to the tourism industry.

Housing in the Countryside – A number of comments made: general support; support but the policy in relation to buildings groups should also apply within the Green Belt; the whole SG should apply within the Green Belt; and the SG should make clear that smaller settlements outwith tier 3 of the settlement hierarchy are eligible under this policy.

Green Infrastructure – Should include greater emphasis on support for tourism and leisure.

Airfield Safeguarding – Existing policy is unreasonably restrictive and should give more flexibility to surrounding landowners.