

Perth and Kinross Local Development Plan

Call for Issues

20 January - 31 March 2015

This form should be used to make a submission to the call for issues process to raise awareness of an issue for consideration in the review of the Perth and Kinross Local Development Plan. Requested information should be concise and to the point.

For help completing this form you are advised to read the associated <u>Guidance notes</u> or ring us on 01738 475300

PART 1 APPLICANT AND SITE DETAILS

1. Agents Details (if any)		2. Your details	
Name		Name	
Company	Archial Norr	Company	BP North Sea Exploration
Building No./Name	3	Building No./Name	Hadrian House
Address	Bon Accord Crescent	Address	Callendar Boulevarde Callendar Business Park
Town/City	Aberdeen	Town/ City	Falkirk
Postcode	AB11 6XH	Postcode	FK1 1XT
Telephone	01224 586277	Telephone	
Mobile		Mobile	
Email	rlaird@archialnorr.com	Email	
3. Who is the main conta	ct for this submission?		
Agent You			

PART 2 IDENTIFYING ISSUES

CLIMATE CHANGE 4. 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 <u>EP1</u> & <u>EP2</u> (and associated <u>Supplementary Guidance</u>) of the existing Local Development Plan (LDP) adequately address this issue?
Yes
□ No
☐ Don't know
If no, tell us what change you would like to see, and why?
HEALTHIER LIVES 5. 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?
Yes
□ No
☐ Don't know
If yes, please tell us what change you would like to see and why?

BUSINESS, TOURISM AND LESIURE 6. Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and businesses?	
Yes	
□ No	
☐ Don't know	
If no, please tell us what you consider should change and why?	
	_
7. Do the existing LDP policies (ED1-5) adequately encourage new employment sites and businesses?	
Yes	
No South to the second	
☐ Don't know	
If no, please tell us what you consider should change and why?	
CITY AND TOWN CENTRES 8. 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?	
Yes	
□ No	
☐ Don't know	
If no please tell us for which town(s) and why you consider this to be the case.	

RESIDENTIAL DEVELOPMENT 9. Do policies RD1-6 provide a satisfactory framework for consideration of residential development within Perth & Kinross?
Yes
□ No
☐ Don't know
_ BOTT KIOW
Please give your reason(s) for your answer.
LOW CARBON TRAVEL, HEAT AND POWER 10. 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 policy ER1, Transport policy TA1 and Climate Change, Carbon Reduction and Sustainable Construction policy EP1 of the existing LDP need updating to enable Perth & Kinross Council to fulfill its obligations in this respect?
☐ Yes
☐ Don't know
If yes, please tell us what changes you consider would be appropriate and why?
If yes, please tell us what changes you consider would be appropriate and why?
If yes, please tell us what changes you consider would be appropriate and why?
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RESOURCE SECURITY
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12. Are other Natural Resources adequately protected by the LDP Policies (ER3)?
Yes
□ No
☐ Don't know
If no, explain what aspects of the policy you consider should be altered and why?
GREEN/BLUE NETWORKS
Green/Blue spaces and networks include any area of open space whether public or private; gardens, parks, woodlands and hedgerows. These are all important. It also includes water systems such as rivers, lakes and ponds, and the coastline. Networks refer to the interlinking of these spaces and features all of which have a host of benefits, for both people and biodiversity, e.g. Being utilised for travel to work (such as a footpath network), for leisure (e.g. parkland, woodland, sea-shore) or perhaps providing a habitat for important species.
13. Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately protect and promote green and blue networks?
Yes
□ No
☐ Don't know
If you answered no, please help us by explaining how they should be changed, and your reason(s).
OTHER ISSUES 14. Have we missed any land use planning issue which you consider the revised LDP2 should cover?
✓ Yes
□ No
Don't know

If yes, please detail below, and give reasons for your suggestion(s).

plan is appropriately wo area. The illustration of recommended that the s accord with the policy fr	Health and Safety Consultation Zones, as contained in the current version of the local development rded and gives clear guidance to potential developers within the pipeline consultation zones across the the pipeline consultation zones on the proposals and inset maps is also supported. It is same approach be adopted in the forthcoming version of the local development plan, as this would amework which currently exists at the national level. It would also be in alignment with the approach norities along the route of the pipeline.
Further justification for t	his approach is included in the enclosed statement.
SUPPLEMENTARY GU 15. Does the existing L the SG cover the right	DP have the right balance between Policies and Supplementary Guidance (SG), and does
Yes	
☐ No	
☐ Don't know	
If no, please detail how with your reason(s).	you think the balance should change &/or which topic areas should be included/excluded, together
PART 3 DECLARATI	ONS
I /the agent accept of the preparation of	that details of these issues may be publicised as part of consultation on this and future phases f the Local Development Plan.
Signature	
Development Plan.	hat this is a submission for the Call for Issues process as part of Perth and Kinross Local I hereby confirm that the information given in this form is true and accurate to the best of my stronic submissions, please confirm your statement by ticking the box instead of providing
Signature:	
Name:	Roger Laird
Date:	23rd February 2015

Any personal data that you have been asked to provide on this form will be held and processed in accordance with the requirements of the 1998 Data Protection Act.

Completed Submission forms and location plans should be addressed to developmentplan@pkc.gov.uk

Or alternatively by post to:

Local Development Plan Team Perth and Kinross Council Pullar House 35 Kinnoull Street Perth PH1 5GD

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Commercial
Public Buildings
Lifestyle
Transport

REPORT















Project Number: IAAB/1500800

Project Title: Perth & Kinross, Main Issues Report 2015

Document Title: Representations on Behalf of BP North Sea Infrastructure

Date / Revision: 16th February 2015

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1.0 Introduction

1.1 We act as agents for BP North Sea Infrastructure and are employed to ensure that new development does not compromise the integrity of the Forties Pipeline which runs between Peterhead and Grangemouth, including a section which crosses the Perth & Kinross local authority area. We wish to offer the following comments in response to the Call for Issues and Call for Sites consultation opportunity.

2.0 Policy Background

National Planning Framework 3

2.1 The National Planning Framework 3 provides the Scottish Government's long term strategy for the country, containing plans for the development and investment in infrastructure. Statutory development plans must have regard to the framework in their preparation, and the Scottish Ministers expect planning decisions to support its delivery. Paragraph 3.3 of the framework describes the importance of the oil and gas sector to the country, indicating that if forms the largest industrial sector, contributing an estimated £22 billion to Scotland's GDP in 2012. The industry employs 200 000 people nationally, by supporting the wider economy.

Scottish Planning Policy (SPP)

- 2.2 SPP contains more specific policy advice in relation to the protection of oil and gas infrastructure. Under the section concerning business and employment, paragraph 99 states that development plans should identify any nationally important clusters of industries which handle hazardous substances within their areas, and safeguard them from development. This safeguarding should ensure the creation of appropriate separation distances between hazardous sites and new development.
- 2.3 Further more detailed guidance is included in paragraph 107 which states:

Proposals for development in the vicinity of major accident hazard sites should take into account the potential impacts on the proposal and the major-accident hazard site of being located in proximity to one another. Decisions should be informed by the Health and Safety Executive's advice based on the PADHI tool...

2.4 SPP is therefore clear that development proposals should take cognisance of the presence of pipelines in their vicinity.

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- 3.0 PADHI HSE's Land Use Planning Methodology
- 3.1 The PADHI land use regulations are a guide designed to assist planners and developers in determining likely responses from the HSE in the event that they are to be consulted on development proposals. The guide provides information on proposals which would be acceptable near potentially hazardous installations including pipelines.
- 3.2 The PADHI regulations identify 3 consultation zones which can be described as the inner zone, which is 110 metres from the pipeline; middle zone which lies 380 metres away; and the outer zone which lies 435 metres from the pipeline. Varying forms of development are permitted within each of these consultation zones.
- 4.0 Other Issues Have we missed any land use planning issue which you consider the revised LDP2 should cover?
- 4.1 The existing Policy EP4: Health and Safety Consultation Zones as contained in the current version of the local development plan is appropriately worded and gives clear guidance to potential developers within the pipeline consultation zones which cross the area. The illustration of the pipeline consultation zones on the proposals and inset maps is also supported. It is recommended that the same approach be adopted in the forthcoming version of the local development plan. The foregoing has shown that this approach is strongly advocated by both the National Planning Framework 3 and by SPP. Moreover, it would also be in alignment with the approach taken by other local authorities along the route of the pipeline.



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PART 1 APPLICANT AND SITE DETAILS

1. Agents Details (if any)		2. Your details	
Name	John Handley	Name	
Company	John Handley Associates Ltd	Company	Shell UK Limited
Building No./Name	1	Building No./Name	
Address	St Colme Street	Address	
Town/City	Edinburgh	Town/ City	
Postcode	EH3 6AA	Postcode	
Telephone	0131 220 8253	Telephone	
Mobile		Mobile	
Email	john.handley@johnhandley.co.u	Email	
3. Who is the main contact	for this submission?		
Agent You			

PART 2 IDENTIFYING ISSUES

CLIMATE CHANGE 4. 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 <u>EP1</u> & <u>EP2</u> (and associated <u>Supplementary Guidance</u>) of the existing Local Development Plan (LDP) adequately address this issue?
Yes
□ No
☐ Don't know
If no, tell us what change you would like to see, and why?
no comment
HEALTHIER LIVES
5. 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?
Yes
□ No
☐ Don't know
If yes, please tell us what change you would like to see and why?
no comment

BUSINESS, TOURISMAND LESIURE 6. Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and businesses?
Yes
□ No
☐ Don't know
If no, please tell us what you consider should change and why?
no comment
7. Do the existing LDP policies (ED1-5) adequately encourage new employment sites and businesses?
Yes
□ No
☐ Don't know
If no, please tell us what you consider should change and why?
no comment
CITY AND TOWN CENTRES 8. 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?
Yes
□ No
Don't know
If no please tell us for which town(s) and why you consider this to be the case.
no comment

RESIDENTIAL DEVELOPMENT 9. Do policies RD1-6 provide a satisfactory framework for consideration of residential development within Perth & Kinross?
Yes
□ No
☐ Don't know
Please give your reason(s) for your answer.
no comment
LOW CARBON TRAVEL, HEAT AND POWER 10. 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 policy ER1, Transport policy TA1 and Climate Change, Carbon Reduction and Sustainable Construction policy EP1 of the existing LDP need updating to enable Perth & Kinross Council to fulfill its obligations in this respect?
Yes
□ No
☐ Don't know
If yes, please tell us what changes you consider would be appropriate and why?
no comment
RESOURCE SECURITY 11. Existing policy <u>ER3</u> 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?
no comment

12. Are other Natural Resources adequately protected by the LDP Policies (ER3)?
Yes
□ No
Don't know
If no, explain what aspects of the policy you consider should be altered and why?
no comment
GREEN/BLUE NETWORKS
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Green/Blue spaces and networks include any area of open space whether public or private; gardens, parks, woodlands and hedgerows. These are all important. It also includes water systems such as rivers, lakes and ponds, and the coastline. Networks refer to the interlinking of these spaces and features all of which have a host of benefits, for both people and biodiversity, e.g. Being utilised for travel to work (such as a footpath network), for leisure (e.g. parkland, woodland, sea-shore) or perhaps providing a habitat for important species.
13. Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately protect and promote green and blue networks?
Yes
□ No
☐ Don't know
If you answered no, please help us by explaining how they should be changed, and your reason(s).
no comment
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OTHER ISSUES 14. Have we missed any land use planning issue which you consider the revised LDP2 should cover?
✓ Yes
□No
Don't know If yes, please detail below, and give reasons for your suggestion(s).
This submission is made on behalf of Shell UK Ltd, the owners and operators of some of the existing oil and gas pipelines that cross the Perth LDP Area. It follows on from our client's submissions on the Perth Proposed Local Development Plan which was eventually adopted in February 2014.
On behalf of our client, we welcome the opportunity to provide comments at this early stage of the preparation of the replacement LDP and would request that as part of the detailed assessment of any potential new land allocations in the new LDP that full recognition is given to the existence of the oil and gas pipelines that run through the Perth LDP area. Any new development allocations proposed in close proximity to these pipelines should take account of and reflect the advice of the Health and Safety Executive.
We would welcome the opportunity to provide further advice on these matters should this be of assistance.
We would also request that the existing LDP Policy EP4: Health and Safety Consultation Zones which is set out on page 54 of the current LDP is retained in any replacement LDP. This is an important safeguarding policy and its retention in the new LDP is essential.
We trust these requests can be accommodated, and we would be happy to provide further information on this matter should this be required.
SUPPLEMENTARY GUIDANCE 15. Does the existing LDP have the right balance between Policies and Supplementary Guidance (SG), and does the SG cover the right topic areas?
Yes
□ No
☐ Don't know
If no, please detail how you think the balance should change &/or which topic areas should be included/excluded, together with your reason(s).
no comment

PART 3 DECLARATIONS

✓ I /the agent accept that details of these issues may be publicised as part of consultation on this and future phases of the preparation of the Local Development Plan.						
Signature						
I/ the agent certify that this is a submission for the Call for Issues process as part of Perth and Kinross Local Development Plan. I hereby confirm that the information given in this form is true and accurate to the best of my knowledge (for electronic submissions, please confirm your statement by ticking the box instead of providing signature).						
Signature:	John Handley					
Name:	John Handley, Director, John Handley Associates Ltd					
Date:	27 February 2015					
Any personal data that you have been asked to provide on this form will be held and processed in accordance with the requirements of the 1998 Data Protection Act. 36. How did you find out about the call for sites process? optional question. Councils website						
☐ Notice in Newspaper, could you tell us which one below?						
PKC Development Plan Scheme						
Telephone enquiry to Council						
Email enquiry to Council						
Social Media (e.g. Twitter, Facebook)						
Other, could you tell us how below?						
Further information email from Planning Team						

Completed Submission forms and location plans should be addressed to developmentplan@pkc.gov.uk

Or alternatively by post to:

Local Development Plan Team Perth and Kinross Council Pullar House 35 Kinnoull Street Perth PH1 5GD

The Call for Issues process will run from Tuesday 20 January 2015 for 10 weeks. Completed Submissions must be received by Tuesday 31 March 2015.

From:

TES Development Plan - Generic Email Account

To:

Subject: Perth &

Perth & Kinross LDP - Call for Issues - Submission on behalf of Shell UK Limited

Date: 27 February 2015 17:11:45

Attachments: Shell UK Ltd - PKC Call for Issues - Completed Form - 27.02.15.pdf

Dear Sirs,

Perth & Kinross LDP - Call for Issues - Submission on behalf of Shell UK Limited

We refer to your recent email inviting submissions on the Call for Issues Consultation in advance of the preparation of the new LDP.

On behalf of our client, Shell UK Ltd, the owners and operators of some of the existing oil and gas pipelines that cross the Perth LDP Area, we welcome the opportunity to provide comments at this early stage of the preparation of the replacement LDP and attach a completed Comments Form.

This follows on from our client's submissions on the original LDP, and we would request that as part of the detailed assessment of any potential new land allocations in the new LDP that full recognition is given to the existence of the oil and gas pipelines that run through the Perth LDP area. Any new development allocations proposed in close proximity to these pipelines should take account of and reflect the advice of the Health and Safety Executive. We would welcome the opportunity to provide further advice on these matters should this be of assistance.

We would also request that the existing LDP Policy EP4: Health and Safety Consultation Zones which is set out on page 54 of the current LDP is retained in any replacement LDP. This is an important safeguarding policy and its retention in the new LDP is essential.

We trust these requests can be accommodated, and we would be happy to provide further information on this matter should this be required.

We would be grateful if you would acknowledge safe receipt of this email and attached Comments Form.

Your faithfully,

John Handley





Perth and Kinross Local Development Plan

Call for Issues

20 January - 31 March 2015

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For help completing this form you are advised to read the associated <u>Guidance notes</u> or ring us on 01738 475300

PART 1 APPLICANT AND SITE DETAILS

1. Agents Details (if any)		2. Your details	
Name		Name	Ms. JOAN MCEWEN
Company		Company	
Building No./Name		Building No./Name	
Address		Address	
Town/City		Town/ City	
Postcode		Postcode	
Telephone		Telephone	
Mobile		Mobile	
Email		Email	
3. Who is the main contact	for this submission?		

Agent [

You

PART 2 IDENTIFYING ISSUES CLIMATE CHANGE 4. 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 Do the Environmental Protection and Public Safety policies EP1 & EP2 (and associated Supplementary Guidance) of the existing Local Development Plan (LDP) adequately address this issue? No Don't know If no, tell us what change you would like to see, and why? **HEALTHIER LIVES** 5. 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? Yes No ☐ Don't know If yes, please tell us what change you would like to see and why?

6. Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and businesses? Yes No Don't know If no, please tell us what you consider should change and why?
Don't know
If no, please tell us what you consider should change and why?
7. Do the existing LDP policies (ED1-5) adequately encourage new employment sites and businesses?
Yes
□ No
☐ Don't know
If no, please tell us what you consider should change and why?
CITY AND TOWN CENTRES 8. 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?
Yes
□ No
Don't know
If no please tell us for which town(s) and why you consider this to be the case.
'RESIDENTIAL AMENITY IS PROTECTED' SHOULD BE SPECIFICALLY STATED
"RESIDENTIAL AMENITY IS PROTECTED" SHOULD BE SPECIFICALLY STATED IN RC2 AS IT IS IN RC1.

. 12. Are other Natural Resources adequately protected by the LDP Policies (ER3)?
· Yes
□ No
Don't know
If no, explain what aspects of the policy you consider should be altered and why?
GREEN/BLUE NETWORKS
Green/Blue spaces and networks include any area of open space whether public or private; gardens, parks, woodlands and hedgerows. These are all important. It also includes water systems such as rivers, lakes and ponds, and the coastline. Networks refer to the interlinking of these spaces and features all of which have a host of benefits, for both people and biodiversity, e.g. Being utilised for travel to work (such as a footpath network), for leisure (e.g. parkland, woodland, sea-shore) or perhaps providing a habitat for important species.
13. Do the existing policies (<u>NE1-6)</u> and associated Supplementary Guidance of the LDP adequately protect and promote green and blue networks?
☐ Yes
□ No
Don't know
If you answered no, please help us by explaining how they should be changed, and your reason(s).
POLICY NECO - PERTH LADE CHREN CORRIDOR.
THIS SHOULD BE UPGRADED TO A SSST AS IT HAS RARE
POLICY NEG - PERTH LADE CREEN CORRIDOR. THIS SHOULD BE UPGRADED TO A SSSI AS IT HAS RARE FAUNA AND FLORA AS IDENTIFIED BY P+KC'S OWN LADE SURVEYS.
OTHER ISSUES 14. Have we missed any land use planning issue which you consider the revised LDP2 should cover?
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If yes, please detail below, a	and give reasons for your suggestion(s).
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SUPPLEMENTARY GUIDA! 15. Does the existing LDP the SG cover the right topi	have the right balance between Policies and Supplementary Guidance (SG), and does
Yes	
☐ No	
Don't know	
If no, please detail how you with your reason(s).	think the balance should change &/or which topic areas should be included/excluded, together
<u> </u>	
PART 3 DECLARATIONS	
I /the agent accept that of the preparation of the	letails of these issues may be publicised as part of consultation on this and future phases Local Development Plan.
Signature	
Development Plan. I her	nis is a submission for the Call for Issues process as part of Perth and Kinross Local eby confirm that the information given in this form is true and accurate to the best of my c submissions, please confirm your statement by ticking the box instead of providing
Signature:	
Name:	JOAN H.E. MCEWEN
Data	

Any personal data that you have been asked to provide on this form will be held and processed in accordance with the requirements of the 1998 Data Protection Act.

36.	How did you find out about the call for sites process? optional question.
-	Councils website
	Notice in Newspaper, could you tell us which one below?
	PKC Development Plan Scheme
	Telephone enquiry to Council
	Email enquiry to Council
	Social Media (e.g. Twitter, Facebook)
	Other, could you tell us how below?
	Further information BY E-MAIN FROM PLANNING DEPT/LOPTEAM AS RECISTERED
	FOR SAME RE LOP AND ALSO TAYPLAN ONGOING CONSULTATIONS.

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Or alternatively by post to:

Local Development Plan Team Perth and Kinross Council Pullar House 35 Kinnoull Street Perth PH1 5GD

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20th Feb., 2015.

Dear Team Leader - Development Plans,

on the front of this letter. Here are my thoughts on main principles for the Local Development Plan .—

- 1. Concern that good agricultural ground may be used for housing, thus reducing further our ability to feed ourselves in this country.
- Delease ensure that adequate roads are provided for development in rural locations. Now that Glenlomond is likely to expand, a local by-pass for Wester Balgedie is imperative think ahead.
- 3 Provide more single occupancy/retirement housing to buy or rent, and thus release larger homes for family use.

I wish you well, and thank you for including me in your consulting process. Now that I'm elderly, I feel you could well remove my name from your list.

Yours sincerely,

Delayed Office Opening for Employee Training

This Office will be closed from 8.45am – 11.00am on the 1st Thursday of each month

Mrs Christine M Cameron





The Environment Service

Planning and Regeneration Head of Service David Littlejohn

Pullar House 35 Kinnoull Street Perth PH1 5GD

Contact

Brenda Murray (01738) 475300

Tel E-mail:

DevelopmentPlan@pkc.gov.uk

Our ref

Your ref

Date

20 January 2015

Dear Sir or Madam

Perth & Kinross Local Development Plan 2018-23 Call for Issues and Call for Sites: 20 January - 31 March 2015

Work begins now on the Council's next Local Development Plan that will cover the period 2018-23 and the Council is looking for your input.

My team is now at the stage where we begin to prepare a document called the Main Issues Report. This will concentrate on changes that have occurred since the previous plan and will suggest ideas for future development. In order to gather information for the Main Issues Report we are calling for people, communities and businesses in Perth and Kinross to tell us what they think are the main issues for the Local Development Plan, and where areas or sites with potential for future development may be found. We'd like to hear from you by no later than 31 March.

We'd like to point out that for housing sites, we are most interested in receiving information on potential sites in Highland Perthshire, Strathearn and Strathmore Housing Market Areas; there is unlikely to be significant need for additional land in Kinross or Perth Housing Market Areas.

More information on the above, including guidance notes and an electronic form to use when submitting issues and sites, can be found on our website at:

http://www.pkc.gov.uk/article/10339/Main-Issues-Report

Our Development Plan Scheme outlines the timetable towards adoption of the Local Development Plan, and we will publish and consult on the Main Issues Report in the Autumn.

In the meantime if you would like further advice, or have an issue you would like to discuss, please don't hesitate to contact my team.

Yours sincerely

Brenda E. Munzy.

Brenda Murray Team Leader - Development Plans

Jim Valentine Executive Director



Perth and Kinross Local Development Plan

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PART 1 APPLICANT AND SITE DETAILS

1. Agents Details (if any)	2. Your details	manifestation and the companies of the c
Name	Name	L. B. PALITER
Company	Company	- individual
Building No./Name	Building No./Name	response
Address	Address	
Town/City	Town/ City	
Postcode	Postcode	
Telephone	Telephone	
Mobile	Mobile	
Email	Email	

3. V	Vho i	is 1	the	main	contact	for	this	submission?
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☐ Agent

You

PART 2 IDENTIFYING ISSUES

\sim 1	IRAATE	CHANGE
1 .I	IIVIAIT	LANGE

4. 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 <u>EP1</u> & <u>EP2</u> (and associated <u>Supplementary Guidance</u>) of the existing Local Development Plan (LDP) adequately address this issue?

☐ Yes

No

Don't know

If no, tell us what change you would like to see, and why?

I would like to see much more mention of solar panels of whatever type - LDP should tell us the different types. Is there are mention in LDP about how much Pertt & Pettshire could contribute to the National Grid? Louds Policy ERZ include mention of electricity transmission from Solar Panels?, you could just put in the words "electricity transmission of solar panels."

HEALTHIFR LIVES

5. 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 (<u>PM1</u> & <u>PM2</u>) and Green Infrastructure (NE4).

Do you think these policies and the associated Supplementary Guidance (currently only available for <u>Green Infrastructure</u>) need improving?

T/Ves

☐ No

☐ Don't know

If yes, please tell us what change you would like to see and why?

I can't find much in the LDP about health & air pollution. I know pollution is lad in Pett City at peak times of it certainly comes in my windows.

Is air pollution mentioned anywhere in the LDP?

Walking or cycling is mentioned a lot, but how would that be OU if you had to walk/cycle through air pollution?

The idea of a walk/cycle bridge from Isla Ad on to North Inch is a worthwise idea or should be re-considered.

(NB. I did probly hind EPII on page 58).

BUSINESS, TOURISM AND LESIURE 6. Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and businesses?
Yes
□ No
✓ Don't know
If no, please tell us what you consider should change and why?
I have looked at EDI-S but I don't know everyt about the subjects to comment.
exercel about the subjects to comment.
7. Do the existing LDP policies (ED1-5) adequately encourage new employment sites and businesses?
Yes
No No
Don't know
If no, please tell us what you consider should change and why?
As above.
CITY AND TOWN CENTRES 8. 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?
✓ Yes
□ No
Don't know
If no please tell us for which town(s) and why you consider this to be the case.
In RC5 I wondered if something should be said
about prancial viability, for wilance, of we had
about pinancial viability, for instance, if we had too many cases/oestaurante?
Pett is small or great at grite a few times of the
year.

RESIDENTIAL DEVELOPMENT 9. Do policies RD1-6 provide a satisfactory framework for consideration of residential development within Perth & Kinross?
Yes Yes
□ No
Don't know
Please give your reason(s) for your answer.
Her but I want to suggest that buildings which are only single stover (ground floor) are not the best choice for a city area. This is because they are taking the space where 3 or 4 hours of horsing could be. There (an es in tribus st. PKC floor) suggest a new site for the present occupier of help with them moving to a new site.
LOW CARBON TRAVEL, HEAT AND POWER 10. 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 policy ER1, Transport policy TA1 and Climate Change, Carbon Reduction and Sustainable Construction policy EP1 of the existing LDP need updating to enable Perth & Kinross Council to fulfill its obligations in this respect?
Yes
☑ No
Don't know
If yes, please tell us what changes you consider would be appropriate and why?
Is there any mention of electric wars in the LDP, - there could be. I see a lot of mention of movement away from car travel & more towards cycling & worthing & public iransport. But you should also mention car bon free transport as cars, busel, & say something about the charging points these vehicles need. Support this type of travel because some people will always need a cars. All our busel could be carbon-free.
RESOURCE SECURITY 11. Existing policy <u>ER3</u> 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?
?

12. Are other Natural Resources adequately protected by the LDP Policies (ER3)?	
☐ Yes	
□ No	
☑ Don't know	
If no, explain what aspects of the policy you consider should be altered and why?	
GREEN/BLUE NETWORKS	
Green/Blue spaces and networks include any area of open space whether public or private; gardens, parks, w hedgerows. These are all important. It also includes water systems such as rivers, lakes and ponds, and the of Networks refer to the interlinking of these spaces and features all of which have a host of benefits, for both pe biodiversity, e.g. Being utilised for travel to work (such as a footpath network), for leisure (e.g. parkland, woodl or perhaps providing a habitat for important species.	coastline. ople and
13. Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately promote green and blue networks?	otect and
Yes Yes	
□ No	
Don't know	
If you answered no, please help us by explaining how they should be changed, and your reason(s).	
Yer, but I can think if a line if lime trees, which	L follow
In a cold like which are now malling	-, / -
the part a " 110 sich to member y it public in	very high
tall & a possible righ to member 4 it public in winds, - that has already happened. Does LDP as	ddred
removal of tree? In NEZB it would seem that	organization
1 i la 1 la 1 la 1 la 1/21 mo 1 / 11 Mallacana colores de la 1/21 mo 1 / 11 Mallacana colores de la 1/21 mo 1 / 1/	
because	of danger.
OTHER ISSUES 14. Have we missed any land use planning issue which you consider the revised LDP2 should cover?	
Yes	
□ No	
☑ Don't know	

If yes, please detail below, a	nd give reasons for your suggestion(s).
· ·	
SUPPLEMENTARY GUIDAN 15. Does the existing LDP the SG cover the right topi	have the right balance between Policies and Supplementary Guidance (SG), and does
Yes	
No	
Don't know	
If no, please detail how you with your reason(s).	think the balance should change &/or which topic areas should be included/excluded, together
PART 3 DECLARATIONS	
	details of these issues may be publicised as part of consultation on this and future phases Local Development Plan.
Signature	
Development Plan. I her	his is a submission for the Call for Issues process as part of Perth and Kinross Local reby confirm that the information given in this form is true and accurate to the best of my c submissions, please confirm your statement by ticking the box instead of providing
Signature:	
Name:	LYANE PALMER
Date:	19/03/15

Any personal data that you have been asked to provide on this form will be held and processed in accordance with the requirements of the 1998 Data Protection Act.

36. How did you find out about the call for sites process? optional question.						
Councils website						
Notice in Newspaper, could you tell us which one below?						
PKC Development Plan Scheme						
Telephone enquiry to Council						
Email enquiry to Council						
Social Media (e.g. Twitter, Facebook)						
Other, could you tell us how below?						
Further information enail from PKC						
Completed Submission forms and location plans should be addressed to developmentplan@pkc.gov.uk						
Or alternatively by post to:						
Local Development Plan Team						

Perth and Kinross Council
Pullar House
35 Kinnoull Street
Perth
PH1 5GD

The Call for Issues process will run from Tuesday 20 January 2015 for 10 weeks. Completed Submissions must be received by Tuesday 31 March 2015.



Perth and Kinross Local Development Plan

Call for Issues

20 January - 31 March 2015

This form should be used to make a submission to the call for issues process to raise awareness of an issue for consideration in the review of the Perth and Kinross Local Development Plan. Requested information should be concise and to the point.

For help completing this form you are advised to read the associated **Guidance notes** or ring us on 01738 475300

PART 1 APPLICANT AND SITE DETAILS

1. Agents Details (if any)	2. Your details	
Name	Name Mr. A. C. M.	ORRISON
Company	Company Fossowity T	alred Co
Building No./Name	Building No./Name	
Address	Address	
Fown/City	Town/ City	75—1800 — 27 5 1911—1912
Postcode		
osicode	Postcode	
Telephone	Telephone	
Mobile	Mobile	
mail	Email	

3.	Who	is	the	main	contact	for this	s submission?

☐ Agent

You

CLIMATE CHANGE 4. 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 Local Development Plan (LDP) adequately address this issue? ☐ Yes ☐ No Don't know If no, tell us what change you would like to see, and why? **HEALTHIER LIVES** 5. 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 Do you think these policies and the associated Supplementary Guidance (currently only available for Green Infrastructure) need improving? Yes ∏ No Don't know If yes, please tell us what change you would like to see and why?

PART 2 IDENTIFYING ISSUES

BUSINESS, TOURISM AND LESIURE 6. Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and businesses?
Yes
□ No
Don't know
If no, please tell us what you consider should change and why?
i
7. Do the existing LDD walls to (ED4.1)
7. Do the existing LDP policies (ED1-5) adequately encourage new employment sites and businesses? Yes
M No
Don't know
If no, please tell us what you consider should change and why?
There should be more emphases on development of affrificate business in jurial drees of craft workshops. More setes in small towns of version-
CITY AND TOWN CENTRES
8. 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?
Yes
No The state of th
Don't know
If no please tell us for which town(s) and why you consider this to be the case.
there should be an emphasies on developing brownfeeld
sets in towns before other is greatfield clevelipment
Meniors. Empty slops etc. and to step central areas
there should be an emphasis on developing brownfeel sites in towns before others is queenfield clevelipmant versions. Emply shops ste, and to stop entral areas becoming developet sites.

RESIDENTIAL DEVELOPMENT 9. Do policies RD1-6 provide a satisfactory framework for consideration of residential development within Perth & Kinross?
Yes
™ No
Don't know
Please give your reason(s) for your answer.
I there should be no development adjacent to plan Evaluation 2. Brownfield sites should be developed before additional ignerifield sites on severe described be more concentrate rother 3. Development of vellages should be more concentrate rother than linear
4 Pic should france stes getoorellay per interest
adequite provision and control NB see additioned
LOW CARBON TRAVEL, HEAT AND POWER 10. 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 policy ER1, Transport policy TA1 and Climate Change, Carbon Reduction and Sustainable Construction policy EP1 of the existing LDP need updating to enable Perth & Kinross Council to fulfill its obligations in this respect?
✓ Yes
□ No
Don't know
If yes, please tell us what changes you consider would be appropriate and why?
there needs to be a pruper polecy and quedonce in relation to werd form developents and
on endiredual or small groups afraind temberis to ensure controlled development in appropriate ores.
oreas.
RESOURCE SECURITY 11. 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?
May afflications for developments of this type should be robustly examined to detomine any
communities. The examination should be carried
out by independent experts appointed by PLC.

Madeteeral paper. Resedenteel Development Hem 9. Cantenued 5. To enable developments to take place en appropriate areas there needs to be an assessment of enfrastructure requirements and 6. Closer livisor with Scotlish Water ower buture requirements for mains, water and moins drainage to ensure there is enough development of villages. 7. The requerements for planning should be more detailed and preuse so that there is abothere clarity on whit is required and allowed Too much discretion allows policies to be developer driven not controlled by PRC Social housing should be fromded in erees where there are adequite services by shorts, health certing reloods and transfort not in small justel areus where there enadequite transfer services. Affordable huising should be provided er rural ærees es well as small towns to enable rural areas to thrive.

12. Are other Natural Resources adequately protected by the LDP Policies (ER3)?
Yes
□ No
☐ Don't know
If no, explain what aspects of the policy you consider should be altered and why?
GREEN/BLUE NETWORKS
Green/Blue spaces and networks include any area of open space whether public or private; gardens, parks, woodlands and hedgerows. These are all important. It also includes water systems such as rivers, lakes and ponds, and the coastline. Networks refer to the interlinking of these spaces and features all of which have a host of benefits, for both people and biodiversity, e.g. Being utilised for travel to work (such as a footpath network), for leisure (e.g. parkland, woodland, sea-shore) or perhaps providing a habitat for important species.
13. Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately protect and promote green and blue networks?
Yes
No No
Don't know
If you answered no, please help us by explaining how they should be changed, and your reason(s).
forth level is a natural asset which rquies whent
Protecteden. There should be wdevelopment permitted en
corred out from to the development; this is executael
corred out from to the development; this is escentall in terms of draincage. No retrospecture plenning afflicutions where there are draincage esques.
We willed where there are draining trills.
OTHER ISSUES 14. Have we missed any land use planning issue which you consider the revised LDP2 should cover?
Yes
□ No
Don't know

f yes, please detail below, and give reasons for your suggestion(s).
Developments in villages or well adjacent to the A 977 should contribute to traffic muligation measures such as round a lawts etc people instant of social houseness is there at for greates represent to these millages. A hypers should be promited at blueringone where an existing base for she was brounded for the purity Provision of public severage to rural communities. SUPPLEMENTARY GUIDANCE 15. Does the existing LDP have the right balance between Policies and Supplementary Guidance (SG), and does the SG cover the right topic areas?
Yes
☑ No
Don't know
If no, please detail how you think the balance should change &/or which topic areas should be included/excluded, together with your reason(s).
hufflementory quidence is required regarding with tarbienes. The development of sufflemently gendence takes for too long after the LDF has been usual ey reglecement for areas of year landscape withe.
PART 3 DECLARATIONS
I /the agent accept that details of these issues may be publicised as part of consultation on this and future phases of the preparation of the Local Development Plan.
Signature
If the agent certify that this is a submission for the Call for Issues process as part of Perth and Kinross Local Development Plan. I hereby confirm that the information given in this form is true and accurate to the best of my knowledge (for electronic submissions, please confirm your statement by ticking the box instead of providing signature).
Signature:
Name: ALEXANDER CHARLES MORRISON.
Date: 24,315

Any personal data that you have been asked to provide on this form will be held and processed in accordance with the requirements of the 1998 Data Protection Act.

24:3.15

B. Merroy.
Local Development Plan Team,
PKC
Pullor House
35 Kinnwell Street
Porth.

Dear Brenda,

P415 60.

Call for Times and

Call for Sites

Focal Revelopment Plan 2018-23.

With reference to our discussions

at the draf in session for ca. I enclose

the response from Fossoway and Destruct C.C.

The I sues are as fer the enclosed forms

have a sufflementary fage

In addition I am enclosing a map of

In addition I am enclosing a map of Good of Devon showing a fortible site which would be sufforted generally if a round about was provided at the trienteen on the Agrical Forsow of Jercego.

The owner of the site would be prefered to Consider the provision of a toundabout defendent on what development took place. There are a number of plential retes withen the buendaries of the current plan of the order of 30 to 40 houses, There sites would defend on the provision of mains sewerage which has beinted capacity at present Yourull has previously indicated support bes a reascenable level of development with the freezely being the old Gartwhenzeien Hotel site and then further development en the Centre of the village. Blairingone would suffort development as previously indicated and also between the line of the previously freshored by- poss and the ullago. The priorely is for development to ensure the viability of the school end secondly a by-pass. Combo. The present boundaries are saturfactors but public sewerage is required.

I would be happy to provide an E further clarification you require.

Yours sensearly

Chair Forsawy Derbut CC.

Abernethy and District Community Council

Local Development Plan Team Pullar House 35 Kinnoull Street Perth PH1 5GD



Email – abernethycommunitycouncil@pkc.gov.uk

2nd March 2015

Dear Team[RM1]

The committee thank you for this opportunity to participate in the formation of New Development Plan for Perth & Kinross – Preparation of Main Issues Report.

There follows the observations of the committee in relation to the above.

Abernethy and Aberargie Villages

Abernethy village and surrounds has been the subject of substantial development in recent years, in particular two major housing developments, with a more recent extension of 11 dwelling houses to one (Land at Provost Main Caravan Park for A&J Stephen builder). At present there are a number of approved and pending housing developments in the area at Jamesfield Farm, KY14 6EW, and Ayton Farm Aberargie PH2 9NE. There are also a number of individual single developments approved / pending.

It is felt that it should be noted that there are shortfalls in the infrastructure of the villages.

Abernethy primary school although only recently extended through necessity to accommodate the recent expansion to the village is presently nearing capacity and there are concerns that further development can only result in a situation of families being unable to school their children together in the local school.

The local doctors surgery now operates on reduced hours and there is no longer a dental service in the village.

The shortage of local employment and the poor unreliable local bus service is encouraging commuting and as a result the main road through the village has become very busy at certain times of the day. It is feared that further housing development with no local employment can only exacerbate these issues and create 'a dormitory' village scenario with no real identity of place.

There was reasonably sufficient green space in Abernethy prior to recent developments. However due to the fairly high density and minimal provision of open space in these developments the character of the village has been changed considerably.

It is felt there is adequate opportunity for infill sites and house extension for some time and the villages requires time now to integrate with the recent and pending developments.

The committee also feel that the Local Development Plan should complement the ethos of the Tayplan in that main housing development should be focused around Cities, Towns and Major Villages nearer to employment sources and facilities

Given the above, the committee are of the opinion that boundary alterations to accommodate open space and employment opportunities, could be of benefit to the villages and would possibly be acceptable; however it is felt there is no justifiable requirement to alter the present village boundaries to accommodate and identify a housing supply site.

Binn Farm Area

The present Binn Farm Area operations have proven problematic with numerous issues for the local communities and the environment since their concept (SEPA records will verify) and while many of these issues have eventually after many years been resolved the Committee have yet to see as recommended by the Scottish Government Reporter and included in the present adopted Local Development Plan a Master plan or guidance for this site at Binn.

Extract from present Plan.

5.9.1 Binn Farm lies approximately 4 miles to the south of Abernethy. The extent of existing planning consents is shown below and all are identified for waste management uses.

Note: A masterplan will be developed by way of Supplementary Guidance which at a minimum will:

- justify the site boundaries
- identify the uses to be accommodated on the site and the processes and technologies to be accommodated
- identify the impacts on the environment and any appropriate mitigation necessary
- hours of working
- address the array of consequential traffic matters and explain how these will be dealt with.

Wind Turbines

While at present there is supplementary guidance for wind farms the committee are concerned and feel additional guidance or Policy is required. At present a very large single Turbine has had planning approval at Jamesfeild Farm next to the Village of Abernethy. The concerns are - this is a low lying area on the edge of the flood plan for the Tay and Earn estuary. The turbine will be a prominent feature in the area visible from many view- points, major roads and rail routes. While this may be deemed acceptable the problem will arise should further land owners along the valley and estuary feel they also wish to install one large turbine resulting in haphazard sporadic development which would severely take away from the character and amenity of the area as a whole.

Solar PV Projects

The committee have been made aware that a developer is looking to pursue such a project in this area. At present there is no guidance or Policy in the Local Development Plan to assist in preparing, determining or making representation to such a proposal. The committee feel a Policy or guidance would benefit all involved and should be included in the Development Plan.

Parking

Inconsiderate and lack of Parking are a continual issue on our agenda; any consideration in Council Policy or Guidance that would assist with this issue would be greatly appreciated.

The committee trust the above comments will be given due consideration.

Yours sincerely

Ann Sangster

For and on behalf of Abernethy & District Community Council

Mrs. A. Sangster Secretary/ Contact



Perth and Kinross Local Development Plan

Call for Issues

20 January - 31 March 2015

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For help completing this form you are advised to read the associated **Guidance notes** or ring us on 01738 475300

PART 1 APPLICANT AND SITE DETAILS

1. Agents Details (if any)		2. Your details	
Name [Name	Bill Fyfe
Company [Company	
Building No./Name		Building No./Name	Oaklands
Address		Address	
Town/City [Town/ City	
Postcode [Postcode	
Telephone [Telephone	
Mobile [Mobile	
Email [Email	
3. Who is the main contact	for this submission?		

PART 2 IDENTIFYING ISSUES

CLIMATE CHANGE

some years.
Do the Environmental Protection and Public Safety policies <u>EP1</u> & <u>EP2</u> (and associated <u>Supplementary Guidance</u>) of the existing Local Development Plan (LDP) adequately address this issue?
Yes
✓ No
Don't know
If no, tell us what change you would like to see, and why?
As a village that has doubled in size over the past 15 years without adding in any amenities we would like to see a better use of open spaces available for use by the community. One proposal would be that the community with assistance could purchase the farm land on the north side of the village (behind the current houses on the main road) and this could be transformed into a community wood with cycle tracks, some area's for allotments to be constructed (which could be rented o to locals) and also to install a hydro scheme on the Ruthven water which would help finance the project.
HEALTHIER LIVES 5. 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?
Infrastructure) need improving? Yes
Infrastructure) need improving? Yes
Infrastructure) need improving?
Infrastructure) need improving? Yes No

BUSINESS, TOURISM AND LESIURE 6. Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and businesses?
✓ Yes
□ No
☐ Don't know
If no, please tell us what you consider should change and why?
7. Do the existing LDP policies (ED1-5) adequately encourage new employment sites and businesses?
✓ Yes
□ No
Don't know
If no, please tell us what you consider should change and why?
we currently have several empty and unused commercial sites available in the village.
CITY AND TOWN CENTRES
CITY AND TOWN CENTRES 8. 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?
✓ Yes
□ No
Don't know
If no please tell us for which town(s) and why you consider this to be the case.

RESIDENTIAL DEVELOPMENT 9. Do policies RD1-6 provide a satisfactory framework for consideration of residential development within Perth & Kinross?
✓ Yes
□ No
Don't know
Please give your reason(s) for your answer.
with the current volume of houses being built in Auchterarder we are reaching saturation point.
LOW CARBON TRAVEL, HEAT AND POWER 10. 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 policy ER1, Transport policy TA1 and Climate Change, Carbon Reduction and Sustainable Construction policy EP1 of the existing LDP need updating to enable Perth & Kinross Council to fulfill its obligations in this respect?
Yes
✓ No
Don't know
If yes, please tell us what changes you consider would be appropriate and why?
The proposal to build a hydro scheme would assist with the CO2 reduction
RESOURCE SECURITY 11. Existing policy <u>ER3</u> 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?

12. Are other Natural Resources adequately protected by the LDP Policies (ER3)?
Yes
✓ No
Don't know
If no, explain what aspects of the policy you consider should be altered and why?
we are allocating to much green land for house building
GREEN/BLUE NETWORKS
Green/Blue spaces and networks include any area of open space whether public or private; gardens, parks, woodlands and hedgerows. These are all important. It also includes water systems such as rivers, lakes and ponds, and the coastline.
Networks refer to the interlinking of these spaces and features all of which have a host of benefits, for both people and biodiversity, e.g. Being utilised for travel to work (such as a footpath network), for leisure (e.g. parkland, woodland, sea-shore)
or perhaps providing a habitat for important species.
13. Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately protect and promote green and blue networks?
Yes
✓ No
Don't know
If you answered no, please help us by explaining how they should be changed, and your reason(s).
the above proposal would help with this
OTHER ISSUES 14. Have we missed any land use planning issue which you consider the revised LDP2 should cover?
Yes
✓ No
Don't know

If yes, please detail below, and give reasons for your suggestion(s).				
SUPPLEMENTARY GI 15. Does the existing the SG cover the righ	LDP have the right balance between Policies and Supplementary Guidance (SG), and does			
Yes				
☐ No				
✓ Don't know				
If no, please detail how with your reason(s).	If no, please detail how you think the balance should change &/or which topic areas should be included/excluded, together with your reason(s).			
PART 3 DECLARAT	IONS			
	that details of these issues may be publicised as part of consultation on this and future phases of the Local Development Plan.			
Signature				
Development Plan	that this is a submission for the Call for Issues process as part of Perth and Kinross Local . I hereby confirm that the information given in this form is true and accurate to the best of my ctronic submissions, please confirm your statement by ticking the box instead of providing			
Signature:	Bill Fyfe			
Name:	Bill Fyfe			
Date:	4th March 2015			

Any personal data that you have been asked to provide on this form will be held and processed in accordance with the requirements of the 1998 Data Protection Act.

36. How did you find out about the call for sites process? optional question.
Councils website
Notice in Newspaper, could you tell us which one below?
PKC Development Plan Scheme
Telephone enquiry to Council
Email enquiry to Council
Social Media (e.g. Twitter, Facebook)
Other, could you tell us how below?
Further information

Completed Submission forms and location plans should be addressed to developmentplan@pkc.gov.uk

Or alternatively by post to:

Local Development Plan Team Perth and Kinross Council Pullar House 35 Kinnoull Street Perth PH1 5GD

The Call for Issues process will run from Tuesday 20 January 2015 for 10 weeks. Completed Submissions must be received by Tuesday 31 March 2015.

developmentplan@pkc.gov.uk

or

Perth and Kinross Council, The Envoronment Service, Pullar House, Kinnoull Street, Perth.

Perth and Kinross Council, Local Development Plan. Pages 37 - 39.

Windfarms

For some time this Community Council has expressed concerns about the development of wind farms in unspoilt or scenic areas. The growing number of such large structures is a cause for real concern and has impacted on us locally in the form of an application by Banks Renewables Ltd, over one year ago, to construct a wind farm on Bandirran Estate near Balbeggie.

We are opposed to any such development proceeding on the grounds of visual impact from local roads, from the A94 and also from Perth and Scone. The proposed development is located too near to residential areas and, contrary to Perth and Kinross Planning policy, would be visible from both sides of the Sidlaws to the detriment of both locals and tourists. The site selected is close to the ancient hill fort on Dunsinnan Hill and would seriously detract from the vista at that location and the vast turbines are out of proportion with the hills on which the applicant wishes to site them. This would likely hold true no matter which developer wished to construct at this location.

We would submit that tourism is of major importance to employment in Perthshire and that tourists come, in part, to see wild and beautiful Scotland, not to go on a tour of identical and never ending wind farms. The landscape in various areas of Perthshire is outstanding and needs to be preserved for future generations. We welcome the proposals by PKC to designate several areas, including the Sidlaws and the Carse of Gowrie, as a Special Landscape Area and trust that the Council will presume against the granting of planning permission for wind farms in this and all such designated areas.

Burrelton and District Community Council.

FIONA PATERSON SECRETARY



Perth and Kinross LDP - Call for Issues and Call for Sites (Consultation)

Consultation Deadline - 31 March 2015

Contact Details

Planning and Local Authority Liaison Department

The Coal Authority 200 Lichfield Lane

Berry Hill

MANSFIELD

Nottinghamshire

NG18 4RG

Planning Email: <u>planningconsultation@coal.gov.uk</u>

Planning Enquiries: 01623 637 119

Person Making Comments

Anthony B Northcote HNCert LA(P), Dip TP, PgDip URP, MA, FGS, ICIOB, MInstLM, MCMI, MRTPI

Consultant Planning Advisor to The Coal Authority

Date of Response

19 March 2015

Background on The Coal Authority

The Coal Authority is a Non-Departmental Public Body sponsored by the Department of Energy and Climate Change (DECC). The Coal Authority was established by Parliament in 1994 to: undertake specific statutory responsibilities associated with the licensing of coal mining operations in Britain; handle subsidence claims which are not the responsibility of licensed coalmine operators; deal with property and historic liability issues; and provide information on coal mining.

The main areas of planning interest to the Coal Authority in terms of policy making relate to:

- the safeguarding of coal in accordance with the advice contained in The National Planning Policy Framework and Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Minerals Planning Policy Wales and MTAN2 in Wales;
- the establishment of a suitable policy framework for energy minerals including hydrocarbons in accordance with the advice contained in The National Planning Policy Framework and Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Minerals Planning Policy Wales and MTAN2 in Wales; and
- ensuring that future development is undertaken safely and reduces the future liability on the tax payer for subsidence and other mining related hazards claims arising from the legacy of coal mining in accordance with the advice in The National Planning Policy Framework and Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Planning Policy Wales and MTAN2 in Wales.

Background on Coal Mining Issues in Perth and Kinross

Surface Coal Resources, Development and Prior Extraction

As you will be aware, the south of Perth and Kinross Council area contains small areas of coal resources which are capable of extraction by surface mining operations.

The Coal Authority is keen to ensure that coal resources are not unnecessarily sterilised by new development. Where this may be the case, The Coal Authority would be seeking prior extraction of the coal. Prior extraction of coal also has the benefit of removing any potential land instability problems in the process. Contact details for individual operators that may be able to assist with coal extraction in advance of development can be obtained from the Confederation of Coal Producers' website at www.coalpro.co.uk/members.shtml.

Coal Mining Legacy

As you will be aware, the area has been subjected to coal mining which will have left a legacy. Whilst most past mining is generally benign in nature, potential public safety and stability problems can be triggered and uncovered by development activities.

Problems can include collapses of mine entries and shallow coal mine workings, emissions of mine gases, incidents of spontaneous combustion, and the discharge of water from abandoned coal mines. These surface hazards can be found in any coal mining area, particularly where coal exists near to the surface, including existing residential areas.

Within Perth and Kinross area there are approximately 123 recorded mine entries and around 31 coal mining related hazards have been reported to The Coal Authority. A range of other mining legacy features are present, in total The Coal Authority High Risk Development Area covers approximately 0.1% of the plan area.

Specific Comments on The Perth and Kinross LDP

The specific comments and/or changes which The Coal Authority would like to make or see in relation to the above document are:

<u>General</u>

As you will be aware SPP in June 2014 clarified what minerals issues were to be included in SDPs and in LDPs. The obligations for LDPs in relation to energy minerals are set out in paragraphs 237, 239 and 240.

In essence The Coal Authority would wish the LDP to include policy content on the following minerals issues:

- safeguard all workable mineral resources which are of economic or conservation value and ensure that these are not sterilised by other development – the adopted LDP in Policy ER3 does this;
- appropriate development management criteria including a requirement for restoration to the highest possible standards – the adopted LDP in Policy ER4 does this;
- areas of search for surface coal extraction:
- identification of the PEDL 133 and PEDL 163 areas; and
- a policy framework for energy minerals, including conventional and unconventional hydrocarbons.

The Coal Authority would also wish the LDP to include policy content on the following:

• policy framework for addressing unstable land – the adopted LDP does this for specified sites, however a wider policy is appropriate

Coal

The adopted LDP does not identify an area of search for coal, this approach needs to be reconsidered against the requirements of paragraph 239 of SPP. The Coal Authority acknowledges that the LDP does not preclude surface coal extraction, however The Coal Authority is concerned that the interpretation of SPP could be utilised in decision making to resist any coal extraction in Perth and Kinross because they would be 'outwith' any area of search.

Hydrocarbons

The existing adopted LDP does not identify the PEDL 133 and PEDL 163 areas and it doesn't explicitly identify a policy framework for energy minerals, including conventional and unconventional hydrocarbons.

The Coal Authority considers that whilst policy ER4 would cover these proposals, a separate and distinct policy would be more appropriate. This could set out the differing requirements that would apply at exploration, appraisal and production stages. It needs to be clear about criteria that would apply to hydraulic fracturing and those that would apply to other forms of hydrocarbon extraction. It is not generally necessary for proposals to extract coal bed methane to utilise the hydraulic fracturing technique.

Conclusion

The Coal Authority welcomes the opportunity to make these early comments. We are, of course, willing to discuss the comments made above in further detail if desired and would be happy to negotiate alternative suitable wording to address any of our concerns. The Coal Authority also wishes to continue to be consulted both informally if required and formally on future stages.

Thank you for your attention.

For and on behalf of Miss Rachael A. Bust B.Sc. (Hons), MA, M.Sc., LL.M., AMIEnvSci., MInstLM, MRTPI Chief Planner / Principal Manager



Local Development Team Perth and Kinross Council Pullar House 35 Kinnoull Street Perth PH1 5GD

19 March 2015

Dear Sir or Madam,

PERTH AND KINROSS LOCAL DEVELOPMENT PLAN 2018-23 - CALL FOR ISSUES AND CALL FOR SITES CONSULTATION

The Mobile Operators Association (MOA) represents the four UK mobile network operators – 3, Telefonica (O2), Everything, Everywhere (formerly Orange & T-Mobile) and Vodafone – on radio frequency, health and safety and associated town planning issues.

The MOA has commissioned Mono Consultants Ltd to monitor all emerging development plan policies and supplementary planning guidance relating to telecommunications development on its behalf.

Please find attached a response to the current consultation documents prepared by Mono Consultants Ltd on behalf of the MOA.

Yours faithfully,



John Cooke Executive Director



Our Ref: GH/MOA

Local Development Team Perth and Kinross Council Pullar House 35 Kinnoull Street Perth PH1 5GD MONO CONSULTANTS LIMITED
48 ST VINCENT STREET
GLASGOW G2 5TS
t: 44 (0) 141 566 6660 f: 44 (0) 141 566 6661
www.monoconsultants.com

19 March 2015

Dear Sir or Madam,

PERTH AND KINROSS LOCAL DEVELOPMENT PLAN 2018-23 - CALL FOR ISSUES AND CALL FOR SITES CONSULTATION

Thank you for your recent consultation on the above and taking the time to seek the Mobile Operators Associations' views on the Perth and Kinross Local Development Plan - Call for Issues and Sites Consultation.

We would like to take this opportunity to comment that we consider it important that there remains in place a telecommunications policy within the emerging Local Development Plan.

It is recognised that telecommunications play a vital role in both the economic and social fabric of communities. National policy guidance acknowledges this through paragraphs 292-300 of Scottish Planning Policy 2014 (SPP 2014) which confirms that the Scottish economy and social networks depend heavily on high quality digital infrastructure.

Paragraph 295 of SPP 2014 confirms that "local development plans should provide a consistent basis for decision-making by setting out the criteria which will be applied when determining planning applications for communications equipment."

Paragraph 298 of SPP 2014 states that, "consideration should be given to how proposals for infrastructure to deliver new services or infrastructure to improve existing services will contribute to fulfilling the objectives for digital connectivity set out in the Scottish Government's World Class 2020 document."

There are numerous documents which will affect the formulation of any telecommunications policy. Planning Advice Note 62: Radio Telecommunications (PAN 62) provides detailed siting and design advice on such matters. On this basis we would suggest that within the Local Development Plan there should be a concise and flexible telecommunications policy, and we would therefore suggest a policy which reads;

Proposals for telecommunications development will be permitted provided that the following criteria are met: -

- (i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area;
- (ii) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building;
- (iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority.

(iv) If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.

When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology.

We would consider it appropriate to introduce the policy and we would suggest the following;

"Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With the growth of services such as mobile internet access, demand for new telecommunications infrastructure is continuing to grow. The authority is keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and siting equipment on existing tall structures and buildings."

We trust you find the above comments of assistance. Please do not hesitate to contact me should you have any queries relating to the above matters.

Yours faithfully

Ginny Hall MRTPI SENIOR PLANNER

Direct dial: 0141 270 2733

E-mail: ginny.hall@monoconsultants.com

From:

John Manning; TES Development Plan - Generic Email Account

To: Cc:

Subject: Date: Re: MBCC Dev Sub02 20 March 2015 10:17:02

Hi John,

I'd be grateful for a copy of the final version that is forwarded to PKC, which I'd then propose to circulate to all MBCDT Directors for information.

Many thanks,

Mike

----Original Message-----From: John Manning

Sent: Friday, March 20, 2015 9:25 AM To: DevelopmentPlan@pkc.gov.uk

Cc: 'TONY THOMPSON'; 'Mike Purdie'; 'Philip Smith'

Subject: MBCC Dev Sub02

Please find attached a joint submission by the Mount Blair Community Council, The Glenshee Tourist Association and the Mount Blair Development Trust for consideration in the preparation of the revised Local Development Plan

John Manning

Secretary Mount Blair Community Council

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I am using the free version of SPAMfighter.

SPAMfighter has removed 7748 of my spam emails to date. Get the free SPAMfighter here: http://www.spamfighter.com/len

Do you have a slow PC? Try a Free scan

http://www.spamfighter.com/SLOW-PCfighter?cid=sigen

A Joint Submission by the Mount Blair Community Council, the Glenshee Tourist Association and the Mount Blair Community Development Trust

The Community Council, Tourist Association and the Development Trust have serious concerns about the impact of the current planning regime on the Mount Blair area. This has come about because the current policy appears completely to reverse the earlier 'Housing in the Countryside' Policy of 2005, which set out how the countryside could provide more housing and more employment.

In the 2005 'Housing in the Countryside' it was stated that:

'The Council is keen to assist opportunities for housing in rural areas as a means of creating a prosperous rural economy, with a stable or increasing population which is balanced in terms of age structure.'

The Draft Eastern Area Local Plan 2005 included Development Zones for both Glenshee and Strathardle. These have now been omitted and we consider that they should be reinstated. These were not proposed as major developments, but as up to 20 houses over a period of 5 years in each zone. Development at this level would be sustainable and would utilise and develop existing local services. A proper survey of local needs would be necessary to establish the realistic and sustainable level of development.

Mount Blair area has a declining and ageing population.

Lack of suitable new employment opportunities is a major factor in the reduction of the local population and consideration must be given to reversing this trend. Without new employment there is unlikely to be much demand for additional housing, except perhaps for some 'affordable housing' for local people retiring from tied housing employment. In the past the staple employer was agriculture but this has declined steadily over time, so that the promotion of tourism and its related employment opportunities is one solution to maintaining and developing a viable community.

The demise of the Spittal of Glenshee Hotel has highlighted further this decline. Concern within the community has heightened to a point where the community are pursuing the possibility of purchasing the Spittal site for redevelopment, with the aims of enhancing the prosperity of the area by attracting more visitors and by creating associated new employment opportunities.

It is considered imperative that, in order to stimulate such development in a rural area such as this, high quality broadband & telephone communications and public transport are also essential. These are currently seriously inadequate.

It seems likely that the present poorly developed prospects for local employment are the main reason behind the PKC-stated view 'that there is no demand for affordable housing in the area'.

Other issues affecting local housing:

Imposition of £6350 on every planning consent granted for a house with two or more bedrooms as a contribution to education – the local school in Kirkmichael is at 60% capacity.

A blanket policy for the whole of Perth & Kinross to be neither sustainable or desirable and will impact negatively on rural areas like Glenshee and Strathardle.

No longer are planning consent granted for essential local residents.

Agricultural ties (Section 77 agreements) have been discontinued so that a farmer wishing to build a house in his farm or for a member of his family or an employee will have to comply with current guidance on siting and design, which may well preclude a house outwith an existing settlement.

It is the collective view of our organisations and the community in general that the needs of the Strathardle and Glenshee communities have largely been overlooked in current PKC development plans, a situation that must be redressed in order to maintain the viability of these rural communities.

12.03.2015







The Local Development Plan Team Perth & Kinross Council Pullar House 35 Kinnoull Street Perth PH1 5GD

24 March 2015

Dear Sir / Madam

COMMUNITY RESPONSE TO PKC REQUEST FOR COMMENTS/PROPOSALS FOR LDP2 – 2018/23

INTRODUCTION

At the Planning drop-in at Pullar House on 25th February 2015, Brenda Murray accepted that before commenting on Main Issues for the 2018/23 LDP, Crieff representative bodies should review the unresolved priority issues from LDP1, and resubmit these for immediate consideration.

LDP1

- 1.1 A summary of the consultation process in Crieff when the current (2014) LDP was being drafted identifies comments and contributions from 80 individuals, 4 community groups, and 6 companies, as well as the Scottish Environmental Protection Agency and the Scottish Government. Little regard was paid to these submissions, a number of which remain matters of concern, and there is a strong perception that Local Authority consultation serves little purpose beyond demonstrating that an exercise has taken place.
- 1.2 The overall increase in the town's population between 1991 and 2011 was 1,345 (equivalent to 22.33% on the 1991 figure). This is significantly higher than the national population increase during the same period 4.17%.
- 1.3 We submit that, before any detailed consideration is given to LDP2 (2018/23), a full review of LDP1 is undertaken, to establish where the Plan is failing the community it is supposed to serve.

2. Main Issues

2.1 The representations made in 2011 by CUSP, the Community Council and the Steering Group of what is now Crieff Community Trust highlighted serious concerns in respect of the

dangers posed by traffic on the High Street/A85, and derelict and unoccupied buildings in the town centre.

- 2.1.1 We also stated that, rather than the proposed headlong development of green-field sites at the periphery of the town, the Local Authority should support a policy of brown-field site development and town-centre regeneration a view clearly identified through an earlier survey of the Crieff community.
- 2.1.2 LDP1's Spatial Strategy Considerations (para. 8.3.2) placed great emphasis on 'retail proposals' at the south side of town and this assertion was a main plank of the Planning Authority's justification to approve the development of MU7 with hundreds of new homes.
- 2.1.3 Plans to provide a medium sized Tesco supermarket at this location have collapsed and the community have a clear preference for supermarket provision in the town centre as opposed to the periphery of the town. (See also: Annexe 2 A2.9 & A2.10)

2.2 Roads and Traffic

- 2.2.1 We understand that the following comment was inserted in the final plan at the Reporter's recommendation:
- 2.2.2 In relation to housing allocations, it will be required to demonstrate through an appropriate transport assessment that the A85 trunk road through Crieff can accommodate the level of development proposed. Should mitigation measures be required, they must be agreed with Transport Scotland.
- 2.2.3 The community has long called for a comprehensive study of traffic flow and road safety issues, particularly along the A85 as it passes through the town centre. In January 2011 a formal request was made to Perth & Kinross Council and to the Scottish Government, via its agency Transport Scotland, for independent consultants to be appointed to carry out this task.
- 2.2.4 The request was reiterated by CUSP in its response to LDP1 and again appears to have been ignored.
- 2.2.5 The behaviour of the local authority and Scottish Government in encouraging ever increasing numbers of vehicles to pass along the High Street without any road improvements causes the community to have concern about the objectiveness of any 'traffic assessment' hence the request for independent consultants to be appointed, (Full details of the request can be found in Appendix 1, para. A1.4).
- 2.2.6 The development since 2011 of the new Community Campus and High School and now the new Primary School has brought new and very significant traffic problems to Broich Road. This is also the area where large scale residential and some light industrial development is scheduled to take place.
- 2.2.7 The Local Authority was relying on Tesco to provide some negligible mitigation to the road infrastructure. In January 2015, Tesco announced that they were no longer coming to Crieff. Broich Road as well as the High Street therefore requires priority focus under the terms of LDP1 (See Annexe 3).







2.3 Derelict and vacant sites and buildings

- 2.3.1 Derelict buildings and residents' concerns about their safety and the impact on the town's trading ability have been expressed to the Local Authority and elected Scottish Government and Council representatives for over a decade. Residents appreciate that in some instances, private ownership creates financial and legal obstacles to progress. However, there are opportunities in the town, and a continued failure to address these issues, as additional threats emerge, is not acceptable.
- 2.3.2 In 2011, the following were identified, and all but one continue to cause major concern.
 - Former Crown Inn. Now under development for Kingdom HA as social housing.
 - **Former Drummond Arms Hotel.** A successful Community Right to Buy application has been lodged by Crieff Community Trust. However, the building's owner has stated that he is not prepared to sell until commercial conditions are favourable. The building is in an advanced state of dilapidation.
 - **Former Strathearn Hotel.** Efforts are being made to re-establish contact with the building's owner. The building is in an advanced state of dilapidation.
 - **Former Library.** An application for change of use to a multi-purpose Arts Centre has been approved. However, the developers are having difficulty in reaching agreement with PKC over the purchase price, and the building remains in limbo.
 - Former Community Hall (old St Michael's Church Hall). The building has now been condemned, and has reverted to the Crown
 - Former South United Free Church (South Church). Although these premises have been bought and there are plans for development to create a hotel, the community will remain concerned until development is realised.
- 2.3.3 The following are now already vacant or will become vacant very shortly:
 - Former slaughterhouse/two vacant residential properties. This range of buildings, at the junction of Broich Road with King Street, was purchased by Sainsbury's during their attempt to develop the adjoining Market Park. Their demolition would allow significant improvement to the road junction. There is substantial contamination on the site.
 - Former supermarket at Penny Lane
 - Former Tesco site at Duchlage Farm
 - Former Town Hall. Crieff CC has asked for a full survey of the building to
 - be provided, together with outline costs for its maintenance, with a view to promoting it as a "town hub" for the use of community bodies, the Crieff Succeeds BID team (should the BID ballot be successful), and a scaled down VIC facility.
 - Crieff Primary School
- 2.3.3 The following are viewed as "under threat":
 - **Police Office.** The building has already been subject to a determined attempt at closure and relocation.
 - Council Offices, James Square. The Council have failed to give unequivocal assurances that the building will continue in its present use.
- 2.3.4 See also Annexe 2 which identifies objectives and priorities for derelict sites and buildings.







3. Conclusion

- 3.1 That a holistic plan is required for Crieff, and, once complete, this should be the only occasion the word "Masterplan" is mentioned in the Crieff context. The community believe that a true masterplan should provide a community-supported long term vision for the town and its place in Strathearn, Perthshire, and Scotland.
- 3.2 That recognition of the town's history, heritage, its popularity with residents and visitors, as well as its setting amongst wonderful landscape, should be at the heart of such a plan. Whilst growth should not be seen as a threat, and should be welcomed where appropriate, it should only be permitted where sound financial and structural resources are already in place.
- 3.3 That the Local Authority should immediately commission an appropriate traffic survey, as noted by the Reporter, and that this should not be confined to the problems of the High Street/A85, but should examine all problem areas associated with the continued drive for development. The community request that independent consultants are appointed for this study and that the issues identified, in the 2011 request, are included in the terms of reference.
- 3.4 That other infrastructure including school capacity, medical and social services, water and sewage should be reviewed before any further residential development either to the east or southeast of the town is approved.
- 3.5 That no residential development should be allowed on Broich Road (1) until the development at Strathearn View (Pittenzie Road) has been completed, and (2) until radical improvements to Broich Road, including widening and the dangerous triple-junction with King Street and Burrell Street have been carried out.
- 3.6 Our recommendations for priority for unoccupied and/or derelict sites and buildings are contained in Annexe 2 (A2.10).

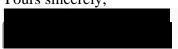
4. LDP2

- 4.1 Our comments and recommendations are contained in Annexe 4.
- 4.2 The Perth & Kinross Council pro forma document 'Local Development Plan Call for Issues' will be submitted separately.

5. Response

5.1 Would you be kind enough to acknowledge receipt of this document? We would ask that the formal response to the points raised is comprehensive and in particular for items raised within 3, specific.

Yours sincerely,



Angus MacDonald Chair of the Crieff & Upper Strathearn Partnership



Stephen Leckie Chair of the Crieff Community Council



Ailsa Campbell Chair of the Crieff Community Trust







Annexe 1 - Roads Infrastructure

A1 Context

- A1.1 Residents have complained consistently over a period of years about the dangers posed by the A85 trunk road passing along the High Street. As ownership of vehicles has increased in this time so has demand on the A85 and the other feeder /arterial roads in the town.
- A1.1.2 Despite this ever-increasing usage, other than the installation of new LED street lighting, no significant improvements have been made to the road or pavements of the A85 in Crieff for many years.
- A1.1.3 A full range of heavy goods, agricultural, construction and public service vehicles as well as vans, cars, motor bikes, disability scooters, pedal cycles, pedestrians and animals pass along the High Street. The trunk road brings with it an ever-present threat to life and limb as well as the prospect of damage to other vehicles, buildings and property.
- A1.1.4 Many residents feel that it is only luck that has prevented a fatal road accident along the High Street in recent years and that by the very nature of the volume, types and often excessive speeds of heavy traffic passing along it a fatal accident(s) is/are inevitable.
- A1.1.5 Crieff's High Street includes areas where the road and pavements narrow significantly and the dangers posed by traffic obviously increase.
- A1.1.6 The uneven pavements are made up of a 'hotchpotch' of different building materials and apart from presenting trip hazards can only have a negative impact on the businesses attempting to trade in the town centre.
- A1.1.7 The community has previously also expressed concern that plans to substantially increase housing along the Broich Road and at Wester Tomaknock would, necessarily, put additional pressure on the Broich Road and Dollerie Terrace.
- A1.1.8 The failure of LDP1 to even mention air quality management issues in the Crieff context or devote any infrastructure considerations to roads in Crieff is in stark contrast to the detailed analysis provided for the city of Perth. The AQMA in Perth

A1.2 Parking issues

- A1.2.1 Parking has always been an issue in the town and the removal of parking bays and an obvious open area of parking has only added to the problems faced by motorists wanting to park in the town.
- A1.2.2 The two car parks in close proximity to the High Street are hidden from view and those unfamiliar with Crieff can easily pass along the length of the High Street and be out of the commercial area without discovering an opportunity to park.
- A1.2.3 It is hoped that the new on street parking charges will help to alleviate this problem, but much will depend on the ability of Perth & Kinross Council to effectively enforce the new regime.







A1.2.4 Very clear and obvious car parking signs are required to explain availability to visitors and an additional town centre car park, either immediately visible from the High Street or clearly signed would be beneficial.

A1.3 Obstructions and pollution

- A1.3.1 A commercial centre cannot thrive without service and goods delivery vehicles and buses and coaches. Whilst the need for all these types of vehicle is accepted flow along Crieff's High Street is often restricted as a result of obstructing vehicles.
- A1.3.2 Some would say that reducing the flow of traffic leads to speed reductions and that this should be welcomed. However it is also fair to say that obstructing vehicles present dangers to pedestrians emerging from behind them, and can also lead to frustration and careless or even reckless behaviour by other drivers.
- A1.3.3 In years past Crieff's buses delivered the public to a terminal in Church Street, now the empty Penny Lane shopping complex. Although this meant a short walk up the hill to the High Street it did provide a central and safe place to embark on and alight from buses.
- A1.3.4 Pollution from vehicles passing through the town has been at unacceptable levels for several years and a An Air Quality Management Area is in place along the High Street.
- A1.3.5 Recently Scottish Government made several tens of thousands of pounds available to a consultancy firm in an effort to encourage more residents in Crieff to walk and cycle into the town centre. Many residents view the scheme as illogical and a waste of monies that could have been spent far more effectively providing the long called for independent study of traffic by independent consultants in Crieff, (below).
- A1.3.6 The trunk road, narrow pavements, choke points and the town's situation on a hill do not make Crieff a particularly cycle or pedestrian friendly environment yet the purpose was to encourage more pedal cycles and pedestrians into, what are often, already congested areas.
- A1.3.7 We are told that around a third of all traffic passing along the High Street is through traffic that does not stop and which only enters the town as it follows the route of the trunk road.
- A1.3.8 Rather than discouraging locals and shoppers from visiting Crieff's hard pressed centre the Government and local authority could provide genuine assistance by allowing the third of drivers who do not want to stop in the town to pass by unimpeded. Residents appreciate that in times of austerity finding funds for roads improvement is very difficult, but wish to reiterate the town's long term objective of benefitting from either a by pass or relief road.

A1.4 Independent survey of traffic issues

- A1.4.1 In the meantime the following request, made first in January 2011 by CUSP and repeated in the response to the current Draft Local Plan, should be facilitated without further delay:
- A1.4.2 "Appoint Independent Traffic Consultants to examine, recommend solutions and report on:







- The dangers posed by traffic on the A85 trunk road as it passes through Crieff, including: issues of pedestrian and vehicular safety; whether the 'high street' can cope with the speed, size and types of vehicle travelling on trunk roads like the A85; traffic noise and air pollution, and any other trunk road related issues affecting the well being of the town.
- The feasibility of implementing alternative, more effective route(s) and/or systems that would enable traffic to safely pass through, or bypass, the town.
- Whether the size and style of street sign-age is sufficient to alert visitors to the size and location of the town centre's three main car parks.
- A1.4.3 "The various traffic issues referred to above have been allowed to persist and develop over a period of years.
- A1.4.4 "CUSP now respectfully request that the Scottish Government's responsible agency, Transport Scotland, prioritize the research and development of appropriate solutions perhaps jointly with Perth & Kinross Council."
- A1.5 Time Dependent Reduction of High Street speed limit
- A1.5.1 As an interim road safety measure it may be beneficial to introduce 20mph speed limits along the High Street between 0800 and 2000 each day.

A1.6 Broich Road

- A1.6.1 In 2014 representatives of the community were disappointed to hear that an apparent opportunity to widen Broich Road was being rejected by Perth & Kinross Council and that the highway was being purposely kept narrow in an effort to reduce traffic speed.
- A1.6.2 The community has advocated that any pavement along Broich Road be placed on the community campus side of the highway's boundary wall. It is understood the local authority now also support this revision.
- A1.6.3 The road acts as a route to farms, Kinkell Bridge and on to either Madderty and Perth or alternatively to Auchterarder. Heavy agricultural vehicles routinely and necessarily regularly use this road as do heavy council refuse vehicles entering and exiting the adjacent recycling centre.
- A1.6.4 School buses are also frequent users of the Broich Road serving St Dominic's RC Primary School, Crieff High School and the soon to be opened Crieff Primary School.
- A1.6.5 In amongst these vehicles that residents of the town access the community campus and housing estates along this road.
- A1.6.6 Assurances that Perth & Kinross Council 'have a model' and 'know exactly how traffic flows in Crieff' cut no ice with those who live in the town. There is an obvious difference between traffic models and reality. Virtually all residents who use the Broich Road can relate examples of heavy vehicles crossing over pavements, forcing passing traffic into the side etc.







- A1.6.7 Clear evidence of Broich Road's already unsuitability for existing heavy traffic can easily be found simply by looking at tyre marks running along the earth verges at the side of the road.
- A1.6.8 Many locals have witnessed buses and lorries mounting the pavement at the junction of Broich Road with King Street and Burrell Street. This observation is not a criticism of the drivers of large vehicles it is a statement of fact that the existing road infrastructure is not fit for purpose and that a realistic solution should be found to increase pedestrian and vehicle safety.
- A1.6.9 Concerns about increased speed along the Broich Road, should the road be widened, could easily be remedied by the enforcement of realistic speed limits which recognise the existence of the schools, farming, commercial enterprises, council services and housing that is already along the road.

A1.7 Dollerie Terrace

- A1.7.1 Similarly the stipulation that a traffic assessment is required to assess the junction of the Perth Road and Dollerie Terrace to facilitate the building of a hundred additional homes at Wester Tomaknock does little to reassure local residents.
- A1.7.2 There is a suspicion that it is almost a foregone conclusion that any assessment would not impede housing expansion. As has been said earlier there is belief that community / council consultation is an exercise, a box to be ticked, which fails to bring about noticeable change.
- A1.7.3 There are times of the day when entering Dollerie Terrace from Perth Road and trying to progress down its length is extremely difficult. The cars of residents along the street reduce the available road width significantly and many times an unofficial one-way system is utilised. Sadly instances of impatience and misjudgement result in danger to pedestrians and other road users.
- A1.7.4 It is inconceivable that providing access for the occupants of a further one hundred homes, primarily from Dollerie Terrace, will do anything other that exacerbate an already worrying problem.
- A1.7.5 Any survey / assessment conducted in respect of traffic flow along Dollerie Terrace would need to be structured in a way that satisfies local residents that flow along the street during the early morning, through the day and early evening was examined and understood.







Annexe 2 Dereliction, unoccupied buildings, sites and priorities for development

- A2.1 Rather than the number of significant sized derelict and unoccupied buildings and sites falling the number continues to increase the latest large sites assessed as being at threat of becoming vacant include Crieff Primary School, Crieff Police Station, Crieff Visitor Information Centre and the Council Offices in James Square.
- A2.2 Neither the community, the local authority nor the Scottish Government have been able to find a solution to the site of the former Drummond Arms in the very centre of the town. Many locals have reached the stage where demolition is seen as preferable to continuous stagnation, rot and decline.
- A2.3 Though there are said to be plans to develop the South Church in Coldwells Road and the old George Hotel in King Street little has changed.
- A2.4 St Michael's Church Hall on Church Street was last used in 2009, when it was effectively abandoned by a local sports club, as projected repair and maintenance costs were beyond their reach. The building continues to rot and its adjacent former graveyard has and continues to be abused by locals who also allowing their dogs to defecate in the grounds.
- A2.4.1 This is a valuable site, within 50 metres of the High Street and should not be allowed to denigrate Crieff any longer. It is hoped that the local authority will work with the community to quickly bring this site back into beneficial use.
- A2.5 The one 'ray of sunshine' has been the demolition of the former Crown Hotel on the East High Street in the last weeks of 2014. This building stood as a permanent eyesore on the East High Street, visible to all users of the A85 trunk road, for more than 20 years.
- A2.6 Many believe that had a major supermarket been built along Broich Road on the southern edge of the town the threat to town centre traders' prosperity would only have grown.
- A2.7 In 2013 the police made a serious attempt to re-locate the local police station from the centre to the campus. Local opinion was strongly against such a move and, for now, community will seems to have prevailed.
- A2.8 It seems likely that the town's Visitor Information Centre is under threat from its parent body, Visit Scotland and there are also fears that the council offices in James Square may also be run down or closed with staff being re-located to the campus and/or elsewhere.
- A2.9 There is continuing opinion within the town that resources, including major retail development, should be focused on the town centre in particular on the existing and soon to be vacant sites.
- A2.10 Community groups have prioritized their preferences for development as follows: -

Priority Building / Site

- 1. Old Town Hall, High Street
- 2. Old St Michael's Church Hall

Proposed use

Town centre hub (BID / Community groups & Tourist Information space) Demolition and town centre car parking







3. Broich Road and A85 (along High Street) Independent traffic assessments and meaningful road and safety improvements

A2.11 Although the development preferences outlined at A2.10 are priorities in recent years community consultations have shown there is also demand for a variety of other facilities and retail outlets in the town centre.







Annexe 3 LDP1 Further Issues

- A3.1 LDP1's Spatial Strategy Considerations (para. 8.3.2) asserts: -
- A3.1.1 The Plan identifies retention of existing employment land together with new employment land, education and retail proposals at the south of the town.
- A3.1.2 This provision of better community and commercial facilities in the town supports the allocation of the majority of the Strathearn Area housing proposals to Crieff. The south of the town has been identified as the most suitable direction to sustainably grow the settlement and provide a long-term housing and employment land supply.
- A3.1.3 After pointing out the importance of tourism to Crieff it continues: -
- A3.1.4 The Plan identifies the town centre where policies seek to encourage the retention of town centre uses to ensure continued vitality and viability. A site for a medium sized food store has been identified at the southern part of the town, which will help to reduce the need to travel to Perth or Stirling for food shopping.
- A3.1.5 The collapse of the scheme to build a supermarket on the south side of the town completely undermines the Planning Authority's justification to develop hundreds of additional homes along the Broich Road.
- A3.1.6 In January 2015 concerns in respect of Tesco's withdrawal from the Broich Road Crieff development and the state of the town centre led local MP Gordon Banks to call for the establishment of a retail and trading task force to look at ways of rejuvenating Crieff and offering support to aspiring businesses in the town. Mr Banks spoke of the "blight of empty and derelict properties" and described Tesco's decision as "a further kick in the teeth for the town."
- A3.1.7 There should be a complete moratorium on plans to develop MU7 without:
 - a) Supporting retail development, sited preferably in town centre sites
 - b) Improvements to the junctions of Broich Road with King Street and Burrell Street
 - c) Widening of the carriageway along Broich Road to allow two HGVs to pass one another safely
- d) Revision of pedestrian safety measures (See also Annexe 4, A4.1.2)
- A3.2 In his conclusions the Reporter suggests that sufficient guidance is available to planners from the Spatial Considerations para. 8.3.2, the Infrastructure Considerations para 8.3.3 of LDP1 when read in conjunction with Policy PM1, PM1B and Policy TA1.
- A3.2.1 The community believes that the policies identified by the Reporter contain important principles, but do not constitute the required masterplan for the town. Rather like the pavements along the High Street they are a hotchpotch, gathered together for convenience.
- A3.2.2 Deficiencies in the process applied to Crieff become much clearer when compared to concerns expressed in respect of future development in Perth. In the 14 paragraphs contained in Section 8.3 of LDP1 the only reference to traffic in Crieff is as follows: "In relation to housing allocations, it will be required to demonstrate through an appropriate transport assessment that the A85 trunk road through Crieff can accommodate the level of development







- proposed. Should mitigation measures be required, they must be agreed with Transport Scotland." (Inserted by Reporter's recommendation See paras. 2.2.1 and 2.2.2)
- A3.2.3 An entire paragraph (5.1.13) in the report is devoted to Air Quality Management in Perth. Para 5.1.14 asserts: "The biggest single constraint facing the Perth area is the capacity of the roads infrastructure in and around Perth. Not only is congestion becoming a problem but the increased pollution levels evident in several areas of the City required the Council to identify Perth as an Air Quality Management Area."
- A3.2.4 The following paragraph (5.1.15) begins "The Council has commissioned traffic modelling work for the Perth Area. This work has demonstrated that the combination of background traffic growth & committed development will cause not only unacceptable congestion, but also further exacerbate the poor air quality."
- A3.2.5 Three further paragraphs follow devoted purely to Perth City traffic issues and plans to expend £140 million in furtherance of the Perth Future Transport project.
- A3.265 Crieff suffers an AQMA, for years its citizens have complained about traffic, particularly along the A85/High Street. Surely if these issues merit being highlighted and action in Perth they must also merit similar concern and action in Crieff?
- A3.2.7 The community in Crieff wants Perth to prosper and for its citizens to be healthy, but they also want the same for their town, themselves and their families. Whilst many of the county's settlements benefit from the railway network Crieff does not.
- A3.2.8 Bus services from Crieff connecting the town to other settlements are inadequate and do not, for most commuters, provide sufficiently frequent or integrated services.
- A3.2.9 Crieff continues to need a holistic, comprehensive and specific masterplan.

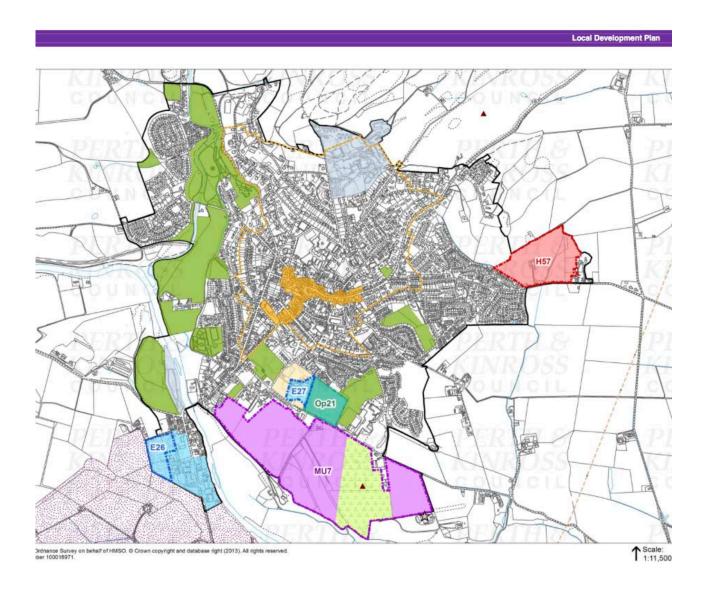






Annexe 4 - LDP 2 Planning

- A3.1 The consensus of opinion within the CCC and CUSP is that objectives identified for Crieff under LDP1 must be concluded as a priority before embarking on future planning for LDP2.
- A3.1.1 Principal reference: Crieff LDP 1 Planning Map (page 251 of original document)
- A3.1.2 The following potential development areas should be put on hold, pending satisfactory conclusion to outstanding LDP1 issues: H57, MU7, E26 and E27



Ends...









Perth and Kinross Local Development Plan

Call for Issues

20 January - 31 March 2015

This form should be used to make a submission to the call for issues process to raise awareness of an issue for consideration in the review of the Perth and Kinross Local Development Plan. Requested information should be concise and to the point.

For help completing this form you are advised to read the associated **Guidance notes** or ring us on 01738 475300

PART 1 APPLICANT AND SITE DETAILS

1. Agents Details (if any)		2. Your details	
Name		Name	M. R. McVittie
Company		Company	1st Marquis of Montrose Society
Building No./Name		Building No./Name	
Address		Address	
Town/City		Town/ City	
Postcode		Postcode	
Telephone		Telephone	
Mobile		Mobile	
Email		Email	
3. Who is the main contact	for this submission?		
Agent Vou			

PART 2 IDENTIFYING ISSUES

CLIMATE CHANGE 4. 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 Local Development Plan (LDP) adequately address this issue? ☐ No Don't know If no, tell us what change you would like to see, and why? **HEALTHIER LIVES** 5. 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? ☐ Yes ☐ No ✓ Don't know If yes, please tell us what change you would like to see and why? See attached letter and annexes

BUSINESS, TOURISM AND LESIURE 6. Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and businesses?
Yes
□ No
✓ Don't know
If no, please tell us what you consider should change and why?
See attached letter and annexes
7. Do the existing LDP policies (ED1-5) adequately encourage new employment sites and businesses?
Yes
□ No
✓ Don't know
If no, please tell us what you consider should change and why?
CITY AND TOWN CENTRES 8. 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?
Yes
□ No
☑ Don't know
If no please tell us for which town(s) and why you consider this to be the case.

RESIDENTIAL DEVELOPMENT 9. Do policies RD1-6 provide a satisfactory framework for consideration of residential development within Perth & Kinross?
Yes
□ No
✓ Don't know
Please give your reason(s) for your answer.
LOW CARBON TRAVEL, HEAT AND POWER 10. 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 policy ER1, Transport policy TA1 and Climate Change, Carbon Reduction and Sustainable Construction policy EP1 of the existing LDP need updating to enable Perth & Kinross Council to fulfill its obligations in this respect?
☐ Yes
□ No
✓ Don't know
If yes, please tell us what changes you consider would be appropriate and why?
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RESOURCE SECURITY
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12. Are other Natural Resources adequately protected by the LDP Policies (ER3)?
Yes
□ No
☑ Don't know
If no, explain what aspects of the policy you consider should be altered and why?
GREEN/BLUE NETWORKS
Green/Blue spaces and networks include any area of open space whether public or private; gardens, parks, woodlands and hedgerows. These are all important. It also includes water systems such as rivers, lakes and ponds, and the coastline. Networks refer to the interlinking of these spaces and features all of which have a host of benefits, for both people and biodiversity, e.g. Being utilised for travel to work (such as a footpath network), for leisure (e.g. parkland, woodland, sea-shore) or perhaps providing a habitat for important species.
13. Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately protect and promote green and blue networks?
Yes
□ No
☑ Don't know
If you answered no, please help us by explaining how they should be changed, and your reason(s).
But See attached letter and annexes
OTHER ISSUES 14. Have we missed any land use planning issue which you consider the revised LDP2 should cover?
✓ Yes
□ No
Don't know

If yes, please detail below, ar	nd give reasons for your suggestion(s).
The preservation of the Battl	efield of Tippermuir as per Policy HE5
SUPPLEMENTARY GUIDAN 15. Does the existing LDP I the SG cover the right topic	have the right balance between Policies and Supplementary Guidance (SG), and does
Yes	
☐ No	
Don't know	
If no, please detail how you t with your reason(s).	hink the balance should change &/or which topic areas should be included/excluded, together
PART 3 DECLARATIONS	
	letails of these issues may be publicised as part of consultation on this and future phases Local Development Plan.
Signature	
Development Plan. I here	is is a submission for the Call for Issues process as part of Perth and Kinross Local eby confirm that the information given in this form is true and accurate to the best of my submissions, please confirm your statement by ticking the box instead of providing
Signature:	
Name:	M. R. McVittie
Date:	24th March 2015

Any personal data that you have been asked to provide on this form will be held and processed in accordance with the requirements of the 1998 Data Protection Act.

36. How did you find out about the call for sites process? optional question.
Councils website
Notice in Newspaper, could you tell us which one below?
PKC Development Plan Scheme
Telephone enquiry to Council
Email enquiry to Council
Social Media (e.g. Twitter, Facebook)
Other, could you tell us how below?
Further information

Completed Submission forms and location plans should be addressed to developmentplan@pkc.gov.uk

Or alternatively by post to:

Local Development Plan Team Perth and Kinross Council Pullar House 35 Kinnoull Street Perth PH1 5GD

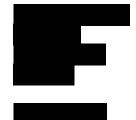
The Call for Issues process will run from Tuesday 20 January 2015 for 10 weeks. Completed Submissions must be received by Tuesday 31 March 2015.

From: Lieutenant Colonel M. R. McVittie Chairman



1st Marquis of Montrose Society

Founded by Alan Macpherson yr of Cluny (A charity registered in Scotland no SC041559)



24th March 2015

Local Development Plan Team Perth and Kinross Council, Pullar House, 35 Kinnoull Street, PERTH PH1 5GD

<u>Battlefield at Tippermuir</u> <u>Battle of Tippermuir 1st September 1644</u>

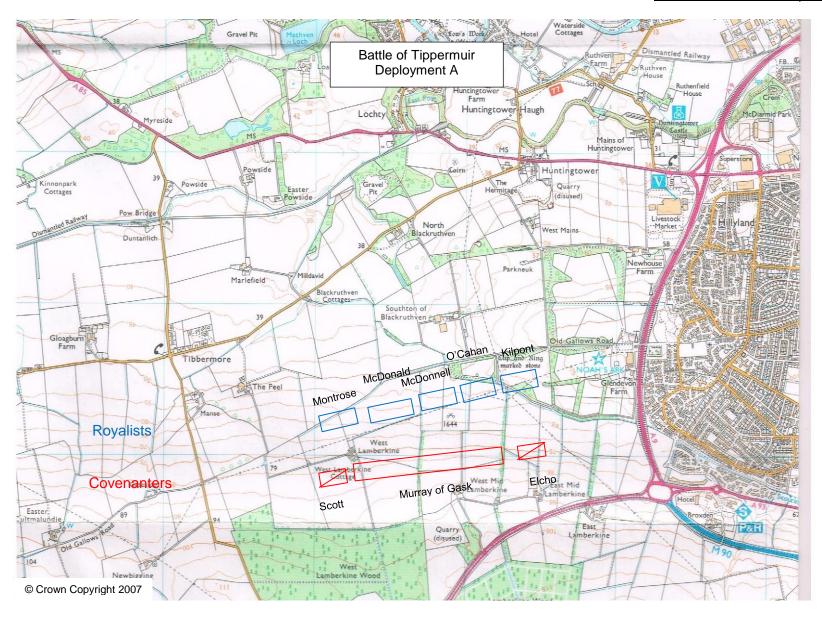
I am writing on behalf of the 1st Marquis of Montrose Society, of which I am currently Chairman, to express our concern over the potential threat posed to the integrity of the Battlefield of Tippermuir by the current Local Development Plan for Perth and the surrounding area.

- 1. Background. The Battle of Tippermuir was the first of the Scottish Civil War (1644-45) and the first of The First Marquis of Montrose's Annus Mirablis in which he won six victories in less than 12 months finally defeating the last Covenant army in Scotland at the Battle of Kilsyth on 14th August 1645. His extraordinary campaign earned him the reputation as one of the finest generals in Europe at the time and possibly Scotland's greatest warrior. He had assumed command of his disparate Army of Irish regulars under command of Alastair MacDonald (MacColla) and a number of clan contingents from the Atholl clans only a few days before. He arrived on the battlefield via Tibbermore church with a force of 2200 infantry but no cavalry to face a Covenant army of up to 6000 infantry and 500 cavalry. The Covenant army under command of Lord Elcho was made up of second line covenanting regiments as most of the first line troops were in England fighting against the King with the English parliamentarians. The battle was short, with a sally by the covenanting infantry as a "forlorn hope" which was met by a volley from all three ranks of the Royalist army followed by the first use of the 'Highland Charge' in Scotland which broke the Covenant line. Thereafter the Covenant forces ran and the battle dissolved into a rout. The battle was over within less than 30 minutes.
- 2. <u>Deployment</u>. The deployment of each army in relation to each other is well known but what is less well known is exactly where the forces stood in relation to the ground. None of the modern biographers such as Professor Edward Cowan, Ronald Williams or Stuart Reid attempt to relate the respective forces to the ground. Earlier biographers suggest possibly that the Covenant forces were drawn up on the high ground centred on West Mid Lamberkine facing North but such a deployment does not make tactical sense. It is much more likely that the Covenanters drew up their forces astride the Old Gallows road facing west to block Montrose's path to Perth. This deployment is strongly supported by the entry for Tippermuir in Historic Scotland's Inventory of Battlefields. This disposition also suits various descriptions of the battle which refer to high ground to the left / south of the Covenant position which Montrose sought to gain possession. Both these deployments are set out at Annexes A and B. There are indications that the army

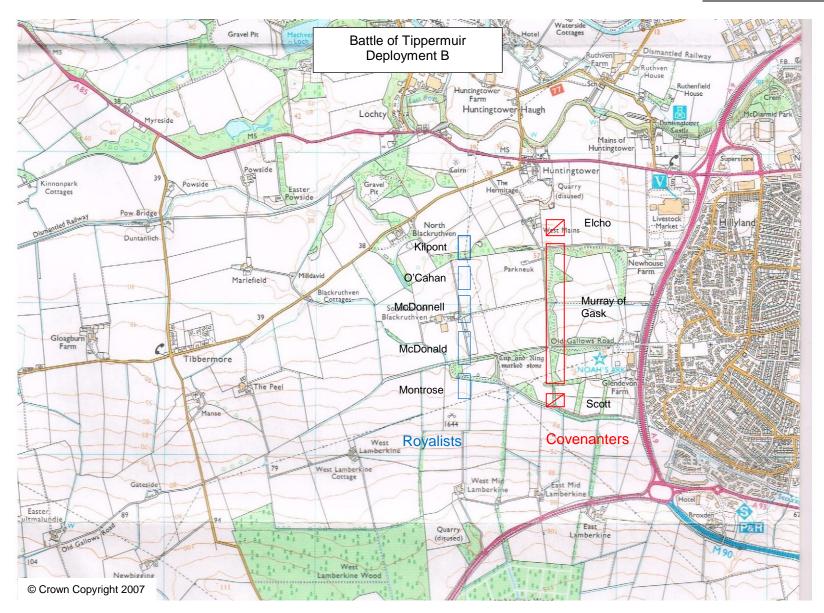
camped outside Perth possibly in the South of Tippermuir parish. However, there are also references to the army merging from Perth on the morning of Sunday 1st September. However, it is possible that the Fife levies camped outside the town and were joined on the morning of the battle by the regiments raised in Perth marching out from the town.

- 3. <u>Dimensions</u>. It is important to remember that a battle site where almost 10,000 troops deploy cannot be contained in the small area implied by a 6 figure grid reference. Each musketeer would occupy 1 metre of front and pike men rather less. However, once drawn up there would have been spaces between regiments as well. So the frontage of 6000 infantry drawn up six deep would stretch at least 1000 metres. Cavalry would also be drawn up six deep but each horse would probably occupy a frontage of two metres. A wing of 250 horse would probably occupy a frontage of a further 160 metres and there would be a significant gap between the infantry and cavalry. Hence a frontage of some 1400 - 1500 metres would have been occupied by Lord Elcho's covenanting force. Montrose facing him would have stood off initially some 300 - 400 metres, out of range of the muskets and the rather modest nine pieces of canon which Elcho is reported to have placed in front of his line. The total area of ground covered by the deployed troops before battle commenced would have covered at least 400 metres by 1400 metres. These dimensions must be taken into account when considering the preservation of this battlefield in terms of the initial deployment.
- 4. <u>Historical Research</u>. Before any development plan can be formed or accepted further historical and archaeological research must be conducted to examine the possible deployments options and confirm the extent of the battlefield to be preserved under Policy HE5. At present there is no evidence of any archaeological research having been done specifically to locate and define the battlefield area.
 - a. <u>Archaeological Research</u>. There would be no requirement for any geophysical research as there were no specific buildings or defensive fortifications involved in the battle. However, an extensive metal detector search may reveal the fall of musket shot and where weapons and armour may have been dropped and lost. It is accepted that there may not be much evidence for any such search to find. The battle did not last long and the Royalist line only discharged one volley. However, there is a record in the Statistical Account of 1843 indicating that 'dykers' developing the drainage systems in the past found muskets balls but there may be no record as to where those items were found. The 1st Marquis of Montrose Society has discussed such a search with Professor Tony Pollard from Glasgow University and some permissions have been obtained. However, the costs are too great for a small society with limited funds.
 - b. <u>Historical Research</u>. It is also recommended that an up to date review of all evidence be undertaken to produce an agreed position as to where the armies stood. This will enable the extent of the battlefield to be defined.
- 5. <u>Public Benefit</u>. Once the battlefield has been defined, the battlefield can be interpreted at various places for the benefit of visitors to better understand the battlefield and the context of the battle in our history. This will be in accordance with the policies PM1, PM2 and HE5 within the Development Plan.
- 6. <u>Conclusion</u>. This is an important battle during a difficult and often misunderstood period of our history. It would be quite wrong to develop land thought to cover the battlefield of Tippermuir without having first fully researched and defined the limits of the battlefield. Once that has been achieved the battlefield can be marked appropriately and then the ground interpreted for the benefit of future generations. This work should be carried out in pursuit of policies underpinning the Development Plan.

Annex A to MoMSoc/15/03/24



Annex B to MoMSoc/15/03/24





Perth and Kinross Local Development Plan

Call for Issues

20 January - 31 March 2015

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PART 1 APPLICANT AND SITE DETAILS

1. Agents Details (if any)		2. Your details	
Name		Name	
Company		Company	Scottish Natural Heritage
Building No./Name		Building No./Name	Inverdee House
Address		Address	Baxter Street Torry
Town/City		Town/ City	Aberdeen
Postcode		Postcode	AB11 9QA
Telephone		Telephone	01224 266500
Mobile		Mobile	
Email		Email	ewen.cameron@snh.gov.uk
3. Who is the main contact	for this submission?		
☐ Agent ✓ You			

PART 2 IDENTIFYING ISSUES

CLIMATE CHANGE

4. 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 <u>EP1</u> & <u>EP2</u> (and associated <u>Supplementary Guidance</u>) of the existing Local Development Plan (LDP) adequately address this issue?
Yes
✓ No
☐ Don't know
If no, tell us what change you would like to see, and why?
Policy EP1: We consider that climate change is the single biggest threat to Scotland's nature and so to our lifestyles, economy and culture. We encourage the Council to lead by example on climate change issues and adopt best practice.
This policy currently sets silver level by 2016, and 'gold level' of sustainability for all new development by 2020, but given the seriousness of climate change for all Local Authorities, especially those with coastal and riverine frontage, we believe that this level of response is inadequate. We refer to the good practice in the Aberdeenshire Proposed Plan which requires a Gold sustainability level for new domestic buildings, or BREEAM level 5 for non-domestic buildings, and strongly recommend Policy EP1 is revised to also require this standard.
EP1A: For all soils we recommend the LDP policy is revised to protect soils from damage such as erosion or compaction (SPP para 194) and we support SEPA's comments in relation to this policy.
For areas of peatland we expect the policy to be strengthened to reflect para 241 of SPP. We aim to publish the final version of SNH's Carbon and Peat map in June. The consultation document is available at: http://www.snh.gov.uk/docs/A1495150.pdf
The map uses data which is already in the public domain and when finalised will identify the location and extent of the nationally important resource of carbon rich soils, deep peat and priority peatland habitat in Scotland. We recommend these areas are spatially represented in the LDP.
EP2: We understand that the next Tayplan is likely to require LDPs to prepare policies for unspoiled coast, and its protection and management including areas at risk from sea level rise and managed realignment. These climate change adaption measures also have potential to deliver ecological benefits for existing and new coastal habitat, and whilst recognising that Perth & Kinross has limited areas of coast, we recommend their inclusion in the new LDP. The Scottish Government has commissioned a 'National Coastal Change Assessment' which aims to create a shared evidence base on coastal erosion. We expect results from this to be available in time to inform this LDP.
HEALTHIER LIVES 5. 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?
✓ Yes
□ No
☐ Don't know
If yes, please tell us what change you would like to see and why?

PM1, PM2 and NE4 - Place making and green infrastructure: The existing policies set out a sound framework for placemaking and green infrastructure. The challenge is now to ensure that these policies are delivered in new development. We encourage the new LDP to lead through context-led spatial planning for its Strategic Development Areas (SDA), Design Frameworks and other masterplan areas, working collaboratively with key stakeholders. This approach will help to maximise natural heritage opportunities and deliver multi-functional benefits. The Placemaking SG will be a key mechanism for clarifying what developers and planners need to do, and how they should engage with other stakeholders (including communities) in order to deliver on some of these aspirations.

The adopted LDP introduced major new SDA growth areas around Perth such as Bertha Park and Perth West and

through new road infrastructure included in Shaping Perth's Transport Future. These will significantly impact on the city. With careful planning, there are opportunities for these areas to contribute to making Perth a more sustainable place, but without considering all the implications of such major development, sustainability issues will only be made more and more problematical for residents, business and others in the future. We made representations to the LDP requesting to participate in the formulation of the masterplans for Perth West and Bertha Park because of their scale and significance. While we welcome the opportunity to attend the charrette this month for Perth West Masterplan framework, our input into Bertha Park masterplan has been limited to an early consultation workshop in 2013, and we extend our offer to participate in this masterplan. We expect the finalised masterplans including green infrastructure and network links to be included in the new LDP.

Green Networks policy and guidance: We strongly supported the production of the Green Network Supplementary Guidance (GN SG) for the adopted LDP. While we welcome many of its principles, we remain concerned about the clarity and application of its strategic spatial maps showing green infrastructure. We still consider that the LDP needs to show clearly identified and spatially defined green networks (and enhancement opportunities) at an appropriate local (rather than just strategic) scale in order to inform the design of the key developments requiring masterplans (PM1C) and/or Design Statements (policy PM2). As the next step, we therefore recommend the new LDP shows the proposed and existing green networks in each of the local settlement maps. In our view, failure to tackle these matters now will only make problems worse in the future.

Tayplan's Proposed Plan's Policy 8 on Green Networks also states that a key priority is to improve links between Tayplan's SDA of West/North West Perth and Perth City centre. We recommend these links are spatially shown in the LDP as new strategic green networks.

We would expect green networks to be informed by the findings of the open space audit and strategy when undertaken (see CF1) and shown at the local settlement scale in the new LDP.

BUSINESS, TOURISM AND LESIURE 6. Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and businesses? Yes No Don't know If no, please tell us what you consider should change and why?

7. Do the existing LDP policies (ED1-5) adequately encourage new employment sites and businesses?
Yes
□No
☐ Don't know
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Yes
No
☐ Don't know
If no please tell us for which town(s) and why you consider this to be the case.
RESIDENTIAL DEVELOPMENT 9. Do policies RD1-6 provide a satisfactory framework for consideration of residential development within Perth & Kinross?
Yes
No
Don't know
Please give your reason(s) for your answer.

LOW CARBON TRAVEL, HEAT AND POWER 10. 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 policy <u>ER1</u> , Transport policy <u>TA1</u> and Climate Change, Carbon Reduction and Sustainable Construction policy <u>EP1</u> of the existing LDP need updating to enable Perth & Kinross Council to fulfill its obligations in this respect?
✓ Yes
□ No
Don't know
If yes, please tell us what changes you consider would be appropriate and why?
It is not clear how these 3 policies will contribute to meeting these SG legal targets, and it would be helpful if they could demonstrate how they will contribute. For example, how will reaching a silver - or gold - standard by 2020 contribute to the SG target of 42% by 2020?
Policy EP1: Please see our comments under Q4
Policy ER1 states that Supplementary Guidance will provide a spatial framework for large scale wind energy developments, as well as for other renewables. We have just launched a consultation on new guidance on "Spatial Planning for onshore wind – natural heritage considerations" to support local planning authorities on the natural heritage considerations when producing their spatial wind energy frameworks. The consultation draft is available here and runs until the 24th of April:
http://www.snh.gov.uk/planning-and-development/renewable-energy/consultations/ This also includes guidance on how landscape capacity studies can be used to support the requirements of SPP (para 162). We are unclear as to the status of the 2010 landscape capacity study for Perth and Kinross, and we recommend this is included as Supplementary Guidance in the new LDP.
We would expect carbon rich soils, deep peat and priority habitat to be included, as referred to in SPP Table 1 – Spatial Frameworks, Group 2. Repowering and decommissioning of wind farms is also an increasing trend which is worth revisiting at this stage to consider any further policy need. SNH has set up an internal group to further explore natural heritage implications of repowering. Please get in touch us if we can help with any of the above.
There have been serious pollution incidents during the construction of recent run-of-river hydro schemes in Perthshire, resulting in individual and cumulative impacts on Freshwater Pearl Mussel. We would be pleased to discuss this further and how the LDP can provide further policy and guidance. Measures such as geotechnical surveys, as supporting information on the development proposal, may be required in susceptible locations such as steep sided glens – Glen Lyon is a specific example.
RESOURCE SECURITY 11. 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?

2. Are other Natural Resources adequately protected by the LDP Policies (ER3)?
Yes
□No
☐ Don't know
If no, explain what aspects of the policy you consider should be altered and why?
Please see Q's 5 and 13
GREEN/BLUE NETWORKS
Green/Blue spaces and networks include any area of open space whether public or private; gardens, parks, woodlands and hedgerows. These are all important. It also includes water systems such as rivers, lakes and ponds, and the coastline. Networks refer to the interlinking of these spaces and features all of which have a host of benefits, for both people and biodiversity, e.g. Being utilised for travel to work (such as a footpath network), for leisure (e.g. parkland, woodland, sea-shore) or perhaps providing a habitat for important species.
13. Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately protect and promote green and blue networks?
Yes
√ No
☐ Don't know
If you answered no, please help us by explaining how they should be changed, and your reason(s).
Please refer to Q 5).
Policies NE1-6
The following should contribute to Perth and Kinross's green infrastructure:
Local nature conservation sites: These are under-represented in Perth and Kinross. We would be pleased to advise

Local nature conservation sites: These are under-represented in Perth and Kinross. We would be pleased to advise Tayside LBAP and the Council in developing a methodology for the review and identification of sites in accordance with para 197 of SPP, and refer to our guidance: http://www.snh.org.uk/publications/on-line/heritagemanagement/LNCS/default.asp

This is something which has already been undertaken by other Local Authorities and Perth & Kinross runs the risk of being left behind. Furthermore, Perth & Kinross is in the fortunate position of still retaining significant natural heritage assets which underpin tourism and other elements of its economy. Such a review will also demonstrate that the Council is delivering its biodiversity duty and the Tayside LBAP, contributing to green infrastructure and networks and providing early notice to developers, which in turn streamlines the planning process.

Trees and woodland: There is a commitment in the adopted LDP to identify trees and woodlands where nature conservation is of primary importance, in accordance with SPP para 201 which states plans should identify woodlands of high nature conservation value. These are not shown in the Forestry and Woodland Strategy SG and we expect these to be identified through the revised LDP.

PART 3 DECLARATIONS

I /the agent accept that details of these issues may be publicised as part of consultation on this and future phases of the preparation of the Local Development Plan.			
Signature			
Development Plan. I here	is is a submission for the Call for Issues process as part of Perth and Kinross Local eby confirm that the information given in this form is true and accurate to the best of my submissions, please confirm your statement by ticking the box instead of providing		
Signature:			
Name:	Ewen Cameron		
Date:	27 March 2015		
Any personal data that you have been asked to provide on this form will be held and processed in accordance with the requirements of the 1998 Data Protection Act. 36. How did you find out about the call for sites process? optional question. Councils website			
Notice in Newspaper, co	uld you tell us which one below?		
PKC Development Plan	Scheme		
Telephone enquiry to Council			
Email enquiry to Council			
Social Media (e.g. Twitte	r, Facebook)		
Other, could you tell us how below?			
Furtherinformation	email from Council		

Completed Submission forms and location plans should be addressed to developmentplan@pkc.gov.uk

Or alternatively by post to:

Local Development Plan Team Perth and Kinross Council Pullar House 35 Kinnoull Street Perth PH1 5GD

The Call for Issues process will run from Tuesday 20 January 2015 for 10 weeks. Completed Submissions must be received by Tuesday 31 March 2015.



Perth and Kinross Local Development Plan

Call for Issues

20 January - 31 March 2015

This form should be used to make a submission to the call for issues process to raise awareness of an issue for consideration in the review of the Perth and Kinross Local Development Plan. Requested information should be concise and to the point.

For help completing this form you are advised to read the associated **Guidance notes** or ring us on 01738 475300

PART 1 APPLICANT AND SITE DETAILS

1. Agents Details (if any)		2. Your details	
Name		Name	Bridgend, Gannochy & Kinnoull
Company		Company	Community Council
Building No./Name		Building No./Name	c/o GO@L
Address		Address	
Town/City		Town/ City	
Postcode		Postcode	
Telephone		Telephone	
Mobile		Mobile	
Email		Email	bgkcc@hotmail.co.uk
3. Who is the main contact for this submission? Agent Vou			

PART 2 IDENTIFYING ISSUES

CLIMATE CHANGE 4. 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 <u>EP1</u> & <u>EP2</u> (and associated <u>Supplementary Guidance</u>) of the existing Local Development Plan (LDP) adequately address this issue?
Yes
□ No
✓ Don't know
If no, tell us what change you would like to see, and why?
HEALTHIER LIVES 5. 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?
Yes
□ No
✓ Don't know
If yes, please tell us what change you would like to see and why?

BUSINESS, TOURISM AND LESIURE 6. Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and bus	inesses?
Yes	
□ No	
☑ Don't know	
If no, please tell us what you consider should change and why?	
Policy ED1C, relating to the" Motor Mile" is a sensible initiative.	
7. Do the existing LDP policies (ED1-5) adequately encourage new employment sites and busines	ses?
Yes	
✓ No	
Don't know	
If no, please tell us what you consider should change and why?	
ED3 (e) "The local road network must be able to accommodate the nature and volume of the traffic general development in terms of road capacity, safety and environmental impact" is negative, restrictive and possible should state that if the infrastructure lacks capacity, then the capacity for the proposed development must appropriate means. If the capacity is not provided, the proposed development must not proceed.	sibly ambiguous. It
ED3 (g) In our experience a Staff Travel Plan proves little more than a token effort which is not adequate Local Authority. The policy must include penalties for non-compliance with agreed Staff Travel Plan com	•
CITY AND TOWN CENTRES 8. New Government guidance aims to strengthen the role of Town Centres. Do you consider the e in the LDP (RC1-4 and RD2) already support vibrant city and town centres?	xisting policies
Yes	
✓ No	
☐ Don't know	
If no please tell us for which town(s) and why you consider this to be the case.	
RC4 at least prioritises a sequential assessment of sites. It is good to see at least one attempt to identify comments in Section 15 (below)).	r priorities. (see also
I and the second	

RESIDENTIAL DEVELOPMENT 9. Do policies RD1-6 provide a satisfactory framework for consideration of residential development within Perth & Kinross?
Yes
✓ No
Don't know
Please give your reason(s) for your answer.
Policy RD1 (a) (residential development at a density which represents the most efficient use of the site) is simply a formula for over-development of sites and loss of amenity by packing as many dwellings into a space as can be fitted. This is unacceptable.
RD4 Affordable housing: "Whenever practical, the affordable housing should be integrated with and indistinguishable from the market housing." No, it should always be separate.
LOW CARBON TRAVEL, HEAT AND POWER 10. 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 policy ER1, Transport policy TA1 and Climate Change, Carbon Reduction and Sustainable Construction policy EP1 of the existing LDP need updating to enable Perth & Kinross Council to fulfill its obligations in this respect?
✓ Yes
□ No
☐ Don't know
If yes, please tell us what changes you consider would be appropriate and why?
Policy TA1B (new developments should aim to reduce traffic) is an example of ineffective drafting. If this is what the Local Authority wishes, then it should read "new developments must reduce traffic". Otherwise it is meaningless and carries no force. We have already seen one Transport Appraisal cite TA1B and then go on to quantify the additional traffic that will arise.
RESOURCE SECURITY 11. 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?
Given the lack of a viable energy policy at national level, new sources of energy need to be actively promoted. The only issue which arises from developing new sources of energy is to ensure that safety regulations are rigorously applied by the appropriate authorities.

12. Are other Natural Resources adequately protected by the LDP Policies (ER3)?
Yes
□ No
✓ Don't know
If no, explain what aspects of the policy you consider should be altered and why?
GREEN/BLUE NETWORKS
Green/Blue spaces and networks include any area of open space whether public or private; gardens, parks, woodlands and hedgerows. These are all important. It also includes water systems such as rivers, lakes and ponds, and the coastline. Networks refer to the interlinking of these spaces and features all of which have a host of benefits, for both people and biodiversity, e.g. Being utilised for travel to work (such as a footpath network), for leisure (e.g. parkland, woodland, sea-shore) or perhaps providing a habitat for important species.
13. Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately protect and promote green and blue networks?
Yes
✓ No
Don't know
If you answered no, please help us by explaining how they should be changed, and your reason(s).
NE5 Green Belt notes cite potentially contradictory objectives but give no indication of which one(s) take priority. Surely only 1 – 3 merit any priority but does 1. (economy) override 3. (landscape) or vice versa if there is a conflict? No clear guidance is given, thereby indicating that the Local Authority just doesn't know.
OTHER ISSUES 14. Have we missed any land use planning issue which you consider the revised LDP2 should cover?
Yes
□ No
☑ Don't know

If yes, please detail below, a	nd give reasons for your suggestion(s).
SUPPLEMENTARY GUIDAN 15. Does the existing LDP the SG cover the right topi	have the right balance between Policies and Supplementary Guidance (SG), and does
Yes	
✓ No	
Don't know	
If no, please detail how you with your reason(s).	think the balance should change &/or which topic areas should be included/excluded, together
DI EASE SEE ATTACHED	DOCUMENT "BGKCC LDP Issues Feedback Appendix 1.pdf"
I LEAGE GEE ATTACHED	DOCOMENT BONCO EDI ISSUES I EEGDACK APPENDIX 1.pui
PART 3 DECLARATIONS	3
	details of these issues may be publicised as part of consultation on this and future phases Local Development Plan.
Signature	
Development Plan. I her	his is a submission for the Call for Issues process as part of Perth and Kinross Local reby confirm that the information given in this form is true and accurate to the best of my c submissions, please confirm your statement by ticking the box instead of providing
Signature:	
Name:	Bridgend, Gannochy & Kinnoull Community Council
Date:	March 2015

Any personal data that you have been asked to provide on this form will be held and processed in accordance with the requirements of the 1998 Data Protection Act.

36. How did you find out about the call for sites process? optional question.
Councils website
Notice in Newspaper, could you tell us which one below?
PKC Development Plan Scheme
Telephone enquiry to Council
Email enquiry to Council
Social Media (e.g. Twitter, Facebook)
Other, could you tell us how below?
Further information Invitation issued by PKC

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Or alternatively by post to:

Local Development Plan Team Perth and Kinross Council Pullar House 35 Kinnoull Street Perth PH1 5GD

The Call for Issues process will run from Tuesday 20 January 2015 for 10 weeks. Completed Submissions must be received by Tuesday 31 March 2015.

Bridgend, Gannochy & Kinnoull Community Council

www.bgk.org.uk

Chairman – Graham Fleming, Secretary – Terry Myers c/o GO@L, 1 Bowerswell Road, Perth PH2 7DL

bgkcc@hotmail.co.uk

LDP Call For Issues 20 January - 31 March 2015 APPENDIX 1

In failing to include an option to raise other points not covered by the specific questions 1 - 15, the questionnaire displays a rather closed approach to feedback. As there is no space provided to include other comments, we shall use this document to identify our perceived "process" shortcomings relating to (1) the LDP and (2) the accompanying Action Programme, as well as (3) the consequences of these shortcomings.

(1) Looking first at the LDP, we start by asking, "What is a plan?"

At the very least a plan must tell us:

- i. where we wish to go from where we are today (our goals)
- ii. why we need to go there (our vision)
- iii. how we are going to get there (our strategies)
- iv. how long it will take us (the steps along the way)
- v. how much resource it will require (our budget).

A plan must also identify the opportunities and challenges which need to be tackled for us to reach our goals.

The LDP is thus a complete misnomer. It is not a plan but only a reference point for a collection of policies.

Having said that, it does try to set out a vision. A good vision statement must be short, memorable, aspirational and inspirational. The LDP's vision statement (2.2.1) is bland, verbose, uninspiring, non-quantifiable and certainly not memorable, especially when compared with the perceived progress being made nearby in Dundee. The vision statement actually includes "…a Perth & Kinross which is … effective …" What does this mean, if anything?

The LDP fails to set out a clear statement of the critical opportunities and challenges to be tackled in the plan period. These could / should include at least the following:

- i. Accommodating increased population;
- ii. Providing employment for current and incremental population;
- iii. Improving air quality;
- iv. Providing adequate infrastructure;
- v. Improving the amenity of the area to attract more tourism.

Moreover, the LDP must set clear priorities on these challenges to identify which are the most critical for successful execution of the plan. Everything cannot be of equal importance and priority but the LDP does very little to differentiate the critical from the non-critical.

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Bridgend, Gannochy & Kinnoull Community Council

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The LDP also fails to set out goals which are aspirational but attainable and, most importantly, quantified.

When it comes to identifying strategies by which we reach our goals, the LDP has little to say. It singles out areas / sites for development but little more. LDP 2.4.14 recognises explicitly that funding necessary infrastructure is one of the greatest challenges to the delivery of the plan and yet there is virtually nothing in the Action Programme to address this challenge. Where are the strategies and targets for:

- i. developing tourism?
- ii. public transport and roads?
- iii. reducing traffic congestion?
- iv. addressing the problems of parking?
- v. improving air quality?
- vi. Green Belt protection (where we see potentially conflicting but unprioritised considerations of amenity versus economic development)?
- vii. incorporating several Charrettes?
- viii. development of sustainable power sources?
- ix. competing with Dundee for economic growth?

The format of the LDP is inefficient and unwieldy. The procedures and standards are scattered through the plan document. These need to be segregated and retained in a separate "evergreen" document that is updated when legislation or standards change. When all these items are collated together, it will be clearer whether any of them conflict and whether there needs to be a hierarchy of some items.

(2) Moving on to the Action Programme, we ask whether it is a plan?

Unfortunately, we see that it fails to contain essential elements of a plan, both in terms of content and format. Its content seems to be restricted solely to:

- i. amplifying policies:
- ii. delivering development sites, though rail infrastructure receives some attention.

In terms of content, the Action Programme fails to acknowledge or address properly:

- i. air quality issues (not even mentioned!)
- ii. economic development (restricted to 3 monitoring activities!)
- iii. retail and commercial development (restricted to monitoring planning applications!)
- iv. residential development (no action planned what about some proactive activity regarding the Murray Royal Hospital surplus assets?)
- v. transport and accessibility (restricted to only the development of supplementary ouidance)
- vi. community facilities, sport and recreation (also merely restricted to the development of supplementary guidance)
- vii. Charrettes

Page 2 of 3 27. Mar. 2015

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NB. Charrettes, if they actually are ever incorporated into an updated Action Programme, require a budget to fund "quick hits" and longer term capital in order to gain any credibility.

The Action Programme fails to meet even an elementary format of a plan: contrary to the statement in 1.3.2, items in the Action Programme have only targeted starting dates, not completion dates (exceptions being the A9/A85 work and "Potential all through community campus" [sic], whatever that is).

The Cross-Tay Link Road, possibly the most important item of infrastructure, has no date at all! With the exception of the A9, the Action Programme does not contain any resource requirement estimates (capital, effort, etc.)

(3) What, therefore, are the consequences of all these shortcomings?

In general, the lack of a proper plan means that Perth & Kinross does not know where it is going, how it will get there and by when. Without goals and targets, it will tend to stand still and, by standing still, fall further behind the focused efforts of more progressive cities.

In terms of assessing planning applications, the guidance for planning case officers and elected members on the Development Management Committee is insufficient – there is a lack of clear priorities (critical success factors) within the policies to be followed in the LDP. Professional developers simply take advantage of the lack of clarity and precision in the LDP.

A further consequence is that the planning authority becomes increasingly viewed by the public as ineffective and at the mercy of professional planners.

There can be other consequences too with how the planning process is enacted. Lack of clear priorities can lead the "gatekeepers" in the planning authority to be insufficiently assiduous in challenging the claims made in planning applications, e.g. with regard to the content of Transport Assessments, as they fear their judgments will be overturned on appeal. The lack of an effective appeal process against planning permissions is, of course, another drawback in planning legislation.

While we wish to make progress by encouraging successful investment to develop our whole area, the combination of the lack of prioritisation in the LDP and the lack of an effective appeal process leads to the bias towards professional developers being too strong. Likewise, the planning consultation process assigns too little weight to public comment, e.g. from Community Councils, Civic Trusts, public petitions. etc.

The "plan" as presented is inaccessible, unwieldy, unclear, unfocused, incomplete and unduly long. Consequently, the community it purports to serve does not effectively engage in the planning process, thereby creating a bias in favour of professional developers and creating dissatisfaction in the general public regarding the results of the planning process.

Page 3 of 3 27. Mar. 2015

JIM FARQUHARSON

Brenda Murray, Team Leader Development Plans

Perth & Kinross Council

Pullar House

35 Kinnoull Street

Perth, PH1 5GD

30th March, 2015

Dear Ms Murray

Perth & Kinross Local Development Plan - Two facts which should be addressed

- The National Road Structure allows you to drive from London to Aberdeen, on dual carriageway with no roundabouts or traffic lights, with the exception of the Dundee area. Transport Scotland is well aware that the Kingsway is no longer fit for purpose or upgrading to an acceptable and viable bypass for North bound traffic. A new bypass from Longforgan to Tealing could be constructed what plans are in place to accommodate development of the Carse of Gowrie area which might be peripheral to such a plan, when it becomes necessary?
- The classification of the M90, Bridge of Earn to Broxden and over the Friarton Bridge, is a major problem to traffic management, safety and emissions in the City of Perth. Were it to be reclassified as an A road, a substantial number of problems would be overcome in Perth no more heavy, sometimes very wide agricultural equipment from Tractors to Combines and Pea Viners as well as other slow moving vehicles. The other bridges Tay, Forth, Kessock, Erskine and Skye are not motorway bridges and allow these vehicles without fear or breaking the law

Yours sincerely

JW Farguharson

JIM FARQUHARSON

Brenda Murray, Team Leader Development Plans

Perth & Kinross Council

Pullar House

35 Kinnoull Street

Perth, PH1 5GD

30th March, 2015

Dear Ms Murray

Perth & Kinross Local Development Plan

I would like you to include the Carse of Gowrie in the picture and would welcome sustainable answers to the following questions:

- The A90 has 6 graded separate junctions (GSJ) and no roundabouts. This allows smooth exit and entry on to the A90. West of Perth there are two roundabouts that stack up traffic. Why increase this problem by expanding west of Perth, antagonising and disrupting visitors to the Crematorium and supporters of St Johnstone FC.
- Why build another comprehensive school west and north of Perth when the only facilities provided are all on west of Perth as now?
- How many pupils are bussed over the Tay Bridges at present? How many are schooled in Dundee, presumably at a cost to Perth and Kinross?
- 4 What is the population of the Carse of Gowrie?

Perth to Aberdeen railway line used to have 6 stations between Dundee and Perth – one station reopened with Park and Ride facility and closing of a number of level crossings would bring more advantages to the area than Gleneagles (which has been very successful).

Current policy encourages expanding conservation villages (Longforgan and Inchture, Errol etc) where basic services are no longer viable there and traffic problems seem to be without solution. It would make for better planning, long term, to implement a new settlement that could take advantage of the A90 road structure, rail park and ride, school provision, even support the number of wedding venues which now exist. This would reflect the area and support country pupils as opposed to placing them in a city environment.

The Carse of Gowrie never need flood (this is a fact). This is not the case with other areas identified by previous plans.

Most land designation in the Carse is Grade 3II not Grade I or Grade 2. If Perth does not become aware of, and support the potential of the Carse of Gowrie, Dundee undoubtedly will. They already are putting down markers on our boundary. With the contraction of farming, 38 dairy businesses have gone with most livestock production ceasing. We now have diversification in the form of Scotherbs, Cairn O'Mohr, Broomhall Feeds, Taypack, Mackies Crisps, Glendoick Garden Centre, Stewarts of Tayside, Gillies and Mackay, Mains of Errol Soft Fruit, Perthshire Caravans, Wee Pie Shop, Polo Pony Training, Equestrian Centres, Antique Centres, Restaurants, Builders, Car Boot Sales and Car Auctions etc, etc – all employers who deserve recognition and support.

I look forward to your reply.

Yours sincerely		
JW Farquharson	•	

Population growing faster in rural areas than the big cities

DEMOGRAPHICS

BY CAMERON BROOKS

Population growth in some rural parts of Scotland has increased more rapidly than in urban areas, according to a new report.

A new document showed a 16% increase from 2001-13 in the number of people living in so-called "accessible rural" areas - places less than a 30-minute drive from towns with a population of 10,000. The increase means there are now 653,663 people living in these areas and 326,574 living in more remote regions.

which represents a 7% increase in growth over the period in question

By contrast, the population in the rest of Scotland urban areas - grew by only 4% to 4,347,463 people between 2001-13. The population growth in some rural areas maybe explained by

the result of the 2013 Scottish Household Survey, which showed rural folk

were likely to describe their neighbourhood as a very good" place. This is due to fewer litter graffiti and criminal damage problems and lower crime rates.

The Scottish Government report showed people who live in rural areas have longer life expectancies, are less likely to smoke and are the subject of fewer emergency hospital admissions. These areas have a higher proportion of people who volunteer in the community, but have dearer

> Richard Lochhead

housing stock and a

higher rate of households in fuel poverty.

Rural areas have a higher proportion of households spending over £100 a month on fuel for cars. fewer residents who find key services dibenient and who are satisfied with the quality of public transport services delivered.

D

Rural Affairs Secretary Richard Lochhead said: "These findings confirm the quality of life in rural Scotland can be fantastic. There are still challenges associated with living and working in rural Scotland, which the government is working hard to address."

OL OTZET BETES

JIM FARQUHARSON

Brenda Murray, Team Leader Development Plans

Perth & Kinross Council

Pullar House

35 Kinnoull Street

Perth, PH1 5GD

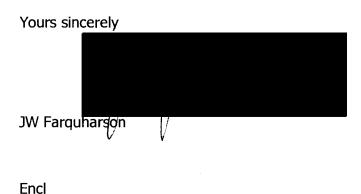
30th March, 2015

Dear Ms Murray

Perth & Kinross Local Development Plan

I enclose my representative statement in support of the addition of Burnside of Monorgan, Longforgan to the Local Development Plan.

I would be grateful if you will consider this in light of the need for housing sites in the Carse of Gowrie area.



Representation Statement for: Burnside of Monorgan, Longforgan

Introduction

This representation is submitted by James W Farquharson, for the promotion of an area of land at Burnside of Monorgan, Longforgan for consideration as a potential residential development opportunity site for the Local Development Plan of Perth & Kinross.

Given recent consideration of this area of Perthshire for sustainable residential development proposals, it is proposed that the site may offer the potential for the creation of a contained Sustainable Village Concept or similar sustainable residential development within an established rural environment.

Context

In accordance with the Planning etc (Scotland) Act 2006 I would like to bring this site forward to be considered within the development plan.

Proposed Site

The site of Burnside of Monorgan, identified in green and enclosed by a red line on the attached location plan, is located on the north shore of the River Tay directly to the south of the settlement of Longforgan and to the east, along the river bank is the established rural hamlet of Kingoodie, both representing good examples of rural residential development.

Occupying an area of some 37 hectares, the site proposed is a fully contained site lying within predominantly naturally bounded site. To the south east lies the River Tay; to the north east, Huntly Burn; the main rail line lies to the north west; and farmland belonging to Monorgan Farm lies to the south west.

Located within the plains of the Carse of Gowrie, an area renowned for orchard land since the 12th century, the site currently offers little sustainable agricultural value due to a considerable number of trees on the site, some fruit, some deciduous and organic seeding species, presently used as surplus grazing ground.

Access

Access to the proposed site is achieved from the existing road network to the north. Firstly the most direct is achieved from the A90 by way of Station Road from Longforgan. Secondary access from Errol in the west and Invergowrie in the east is via the Lower Carse Road.

Internal access to the proposed site is achieved directly from the existing road network bounding the site to the north.

Infastructure

There are no difficulties envisaged in extending infrastructure to service this site.

It is recognised that the development of this site may require contribution to the provision of education, environment and social services in the Perth & Kinross Council area.

Previous Consideration of the Site

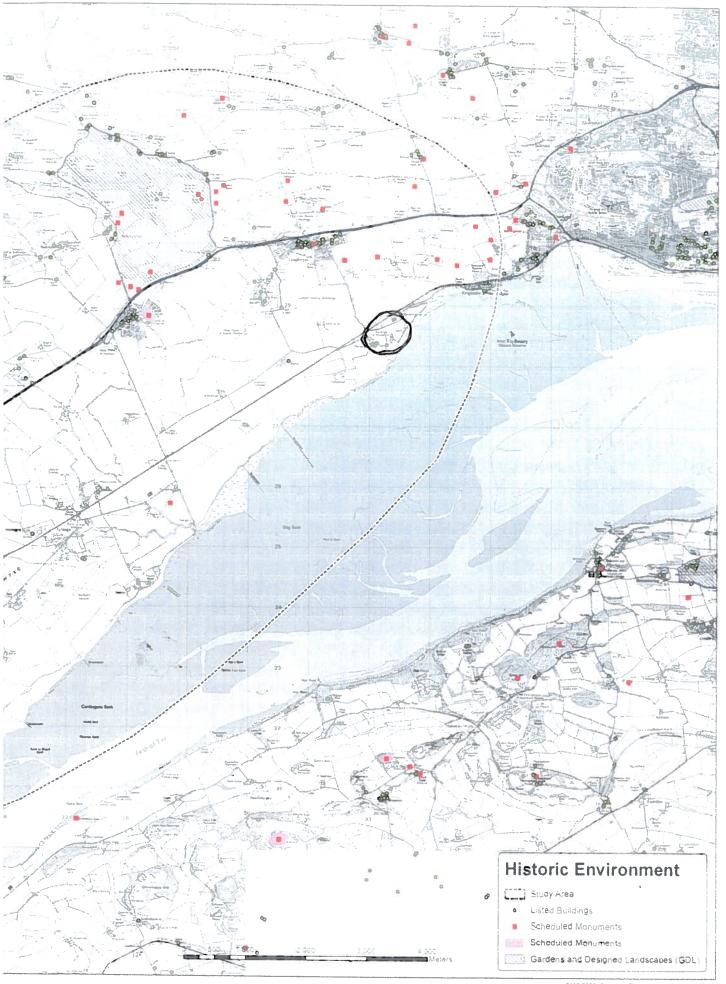
In the 1980s the site, as proposed, was considered, as the preferred option for the creation of an executive residential complex, by the Ford Motor Company who proposed to further develop car manufacturing in Angus.

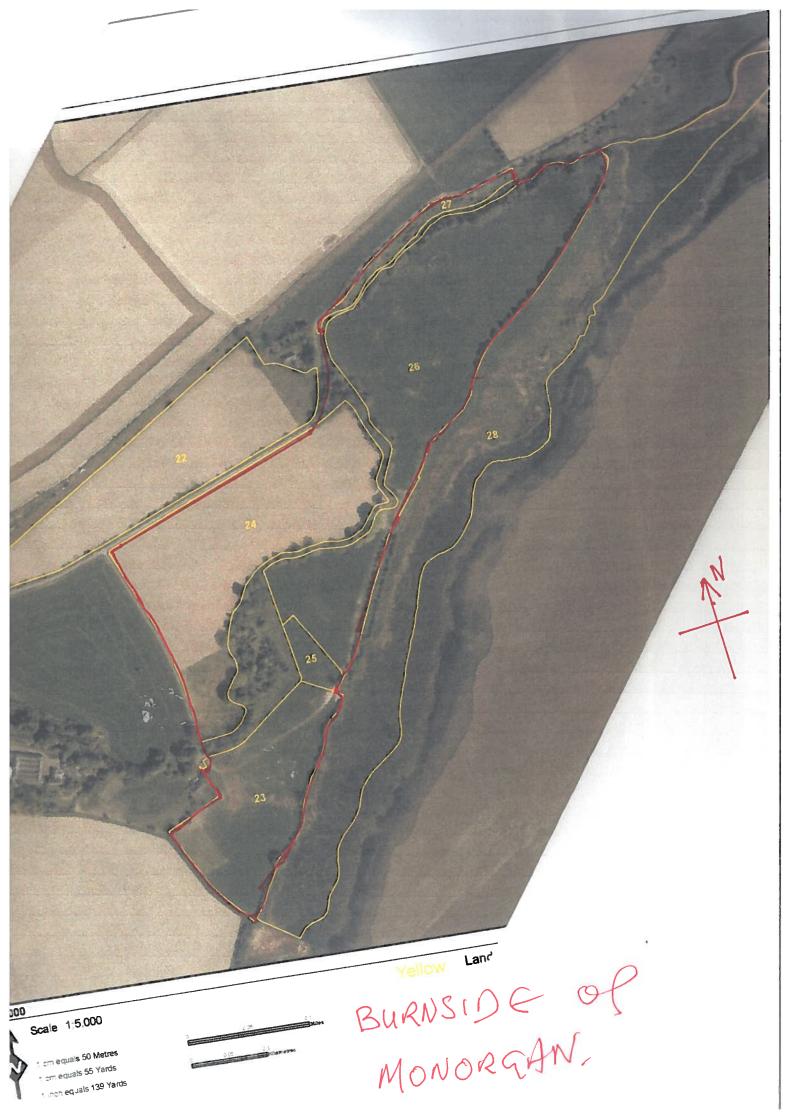
Consideration of Surrounding Villages

It is my understanding that some years ago the village of Kingoodie was awarded and accolade by the Council. It is my contention that Burnside of Monorgan offers an ideal opportunity to create a unique development which can emulate the quality of the existing established residential environment of the surrounding villages and settlements.

Conclusion

In conclusion, it is my contention that this site, located within close proximity to a number of good examples of rural residential development, offers a unique opportunity for the re-use of a redundant area of land to create a quality sustainable self-contained residential environment. I would be grateful if you will consider the development potential of this redundant site and include it in the revised Local Development Plan for Perth & Kinross







Perth and Kinross Local Development Plan

Call for Issues

20 January - 31 March 2015

This form should be used to make a submission to the call for issues process to raise awareness of an issue for consideration in the review of the Perth and Kinross Local Development Plan. Requested information should be concise and to the point.

For help completing this form you are advised to read the associated **Guidance notes** or ring us on 01738 475300

PART 1 APPLICANT AND SITE DETAILS

1. Agents Details (if any)		2. Your details	
Name	Fraser Littlejohn	Name	Wallace Land Investment & Mana
Company	Montagu Evans LLP	Company	Wallace Land Investment & Mana
Building No./Name	Exchange Tower	Building No./Name	
Address	4th Floor 19 Canning Street	Address	
Town/City	Edinburgh	Town/ City	
Postcode	EH3 8EG	Postcode	
Telephone	0131 229 3800	Telephone	PER Agent
Mobile		Mobile	PER Agent
Email	fraser,littlejohn@montagu-evans	Email	PER Agent
3. Who is the main contact	for this submission?		
Agent You			

PART 2 IDENTIFYING ISSUES

CLIMATE CHANGE 4. 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 <u>EP1</u> & <u>EP2</u> (and associated <u>Supplementary Guidance</u>) of the existing Local Development Plan (LDP) adequately address this issue?
Yes
□ No
☐ Don't know
If no, tell us what change you would like to see, and why?
No Comment.
HEALTHIER LIVES 5. 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?
Yes
□ No
Don't know
If yes, please tell us what change you would like to see and why?
No Comment.

RESIDENTIAL DEVELOPMENT 6. Do policies RD1-6 provide a satisfactory framework for consideration of residential development within Perth & Kinross?
Yes No Don't know
Please give your reason(s) for your answer.
Notwithstanding the housing allocations in the current Local Development Plan, in line with SPP, TAYplan seeks to ensure the review of effective allocations noting in its introduction to the Policy 5 context that:-
"the first twelve years of this Plan emphasise 'being ready' to support the progress of the recovery from the start. This requires Local Development Plans to identify sites which are effective or capable of becoming effective to meet the housing land requirement up to year 10, maintain a minimum 5 year effective housing land supply and work towards a 7 year supply by 2015*** to support reaching Policy 5 build rates by 2024, or before then if possible. The scale of growth for 2024-32 is likely to be similar. This will be reviewed through the next Plan. From a place shaping perspective the construction sector will need to provide housing that meets the quality requirements and the needs and aspirations of a range of different households, including low cost housing."
It is considered that the Plan should further review and consider the strategic nature of settlements across the plan area.
Settlements such as Kinross, a Principal Settlement within the area, continue to experience, rightly given their size, demands on development and growth and it is incumbent upon the Plan to explore the future capacity of these settlements in a strategic manner. Whilst Local Development Plans will have a role of looking at how settlements across there respective areas evolve a more strategic look as to how these settlements might be shaped in the future is required. Kinross for example will soon have to consider where future growth is to be focussed, beyond that envisaged by the LDP. Further direction is required by the Plan in this respect. Our client's submissions to TAYplan clarify the TAYplan view that these matters reset with respective LDP's.
It is not clear that the current allocations in the LDP will be delivered as anticipated within the Local Development Plan, or indeed at the rate required.
SPP introduces the presumption in favour of development that contributes to sustainable development (para. 27) and states that planning should direct the right development to the right place (para. 39). Paragraph 125 makes it clear that Planning authorities, developers, service providers and other partners in housing provision should work together to ensure a continuing supply of effective land and to deliver housing, taking a flexible and realistic approach. Where a shortfall in the 5-year effective housing land supply emerges, development plan policies for the supply of housing land will not be considered up-todate.
We would submit that the current allocations within the Local Development Plan will not be delivered as anticipated within the Local Development Plan period, or indeed at the rate required. We are aware of planning delays with the Persimmon proposals at the site of the former Kinross High School and indeed slow progress in relation to the delivery of the Persimmon site at Lathro.
Consequently sites such as West Kinross promoted by our client (previously known as H46) should be considered to be an opportunity in this respect.
LOW CARBON TRAVEL, HEAT AND POWER 7. 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 policy ER1, Transport policy TA1 and Climate Change, Carbon Reduction and Sustainable Construction policy EP1 of the existing LDP need updating to enable Perth & Kinross Council to fulfill its obligations in this respect?
Yes
□ No
□ Don't know

No Comment.	
RESOURCE SECURITY 8. Existing policy <u>ER3</u> 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?	
No Comment.	

If yes, please tell us what changes you consider would be appropriate and why?

9.	Are other Natural Resources adequately protected by the LDP Policies (ER3)?
	Yes
	No
	Don't know
lf n	o, explain what aspects of the policy you consider should be altered and why?
No	Comment.
GR	EEN/BLUE NETWORKS
hed Net	een/Blue spaces and networks include any area of open space whether public or private; gardens, parks, woodlands and degrows. These are all important. It also includes water systems such as rivers, lakes and ponds, and the coastline. It works refer to the interlinking of these spaces and features all of which have a host of benefits, for both people and diversity, e.g. Being utilised for travel to work (such as a footpath network), for leisure (e.g. parkland, woodland, sea-shore) berhaps providing a habitat for important species.
	Do the existing policies (<u>NE1-6</u>) and associated Supplementary Guidance of the LDP adequately protect and omote green and blue networks?
	Yes
	No
	Don't know
If y	ou answered no, please help us by explaining how they should be changed, and your reason(s).
No	Comment.
	HER ISSUES Have we missed any land use planning issue which you consider the revised LDP2 should cover?
	Yes
	No
	Don't know

If yes, please detail below, and give reasons for your suggestion(s).
No Comment.
SUPPLEMENTARY GUIDANCE 12. Does the existing LDP have the right balance between Policies and Supplementary Guidance (SG), and does the SG cover the right topic areas?
Yes
□ No
☐ Don't know
If no, please detail how you think the balance should change &/or which topic areas should be included/excluded, together with your reason(s).
No Comment.
BUSINESS, TOURISMAND LESIURE 13.Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and businesses?
Yes
□ No
☐ Don't know
If no, please tell us what you consider should change and why?
No comment.

14.Do the existing LDP policies (ED1-5) adequately encourage new employment sites and businesses?
Yes
✓ No
☐ Don't know
If no, please tell us what you consider should change and why?
Notwithstanding the TAYplan requirements limited focus has specifically been made in the Local Development Plan to Kinross, a primary settlement within the area.
SPP introduces the presumption in favour of development that contributes to sustainable development (para. 27) and states that planning should direct the right development to the right place (para. 39). It is not considered that the current Plan meets the policy principles of para. 93, which state the planning system should promote business and industrial development that increases economic activity while safeguarding and enhancing the natural and built environments as national assets; allocate sites that meet the diverse needs of the different sectors and sizes of business which are important to the plan area in a way which is flexible enough to accommodate changing circumstances and allow the realisation of new opportunities; and give due weight to net economic benefit of proposed development.
Junction 6 Kinross, together with economic development in the town itself (including Station Road / Junction Road) are strategically important which will significantly contribute to economic development opportunity over the life of the plan for a variety of uses. TAYplan acknowledges that Kinross itself shares strong commuting relationships along the M90 and Forth Bridge with Edinburgh and settlements in Southern Fife such as Dunfermline. Kinross, and Junction 6 of the M90, is a strategic location. Kinross is identified as a 'Tier 2' settlement and Service Centre where an element of growth across the TAYplan area is expected and indeed encouraged. The Plan should identify such strategically important sites are, or have the potential to become, economic development clusters.to encourage further investment and development.
CITY AND TOWN CENTRES 15. 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?
Yes
✓ No
☐ Don't know
If no please tell us for which town(s) and why you consider this to be the case.
Whilst the principle of the approach is supported, it is not considered that a 'one policy, fits all' approach is acceptable. A key focus of the SPP is town centres but it also establishes the methods for identifying a network of centres within the development plan and for treating proposals for development outwith town centres. Not to do so, in line with SPP, could potentially undermine and limit inward investment opportunities. Whilst the principle is supported, the Plan should acknowledge the strategy should allow for retail and other floorspace to be developed outwith the town centre also where its operation ordinarily requires. Smaller Town Centres such as Kinross which itself is a Principal Settlement should not necessarily be constrained, and local considerations in a regional context should be key.
PART 3 DECLARATIONS
I/the agent accept that details of these issues may be publicised as part of consultation on this and future phases of the preparation of the Local Development Plan.
Signature
I/ the agent certify that this is a submission for the Call for Issues process as part of Perth and Kinross Local Development Plan. I hereby confirm that the information given in this form is true and accurate to the best of my knowledge (for electronic submissions, please confirm your statement by ticking the box instead of providing

signature).

Signature:	IMONTAGU EVANS LLP
Name:	Montagu Evans LLP
Date:	27 March 2015
requirements of the 1998 Dat	
36. How did you find out ab	out the call for sites process? optional question.
Councils website	
Notice in Newspaper, cou	lld you tell us which one below?
PKC Development Plan S	Scheme
Telephone enquiry to Cou	ıncil
Email enquiry to Council	
Social Media (e.g. Twitter	, Facebook)
Other, could you tell us he	ow below?
Furtherinformation	

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Or alternatively by post to:

Local Development Plan Team Perth and Kinross Council Pullar House 35 Kinnoull Street Perth PH1 5GD

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Perth and Kinross Local Development Plan

Call for Issues

20 January - 31 March 2015

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PART 1 APPLICANT AND SITE DETAILS

1. Agents Details (if any)		2. Your details	
Name	Ross Anthony	Name	
Company	The Theatres Trust	Company	
Building No./Name		Building No./Name	
Address	22 Charing Cross Road	Address	
Town/City	London	Town/ City	
Postcode	WC2H 0QL	Postcode	
Telephone		Telephone	
Mobile		Mobile	
Email	planning@theatrestrust.org.uk	Email	
3. Who is the main contac	t for this submission?		
☐ Agent ✓ You			

PART 2 IDENTIFYING ISSUES

CLIMATE CHANGE 4. 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 <u>EP1</u> & <u>EP2</u> (and associated <u>Supplementary Guidance</u>) of the existing Local Development Plan (LDP) adequately address this issue?
Yes
□ No
✓ Don't know
If no, tell us what change you would like to see, and why?
HEALTHIER LIVES 5. 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?
Yes
□ No
✓ Don't know
If yes, please tell us what change you would like to see and why?

BUSINESS, TOURISM AND LESIURE 6. Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and businesses?
Yes
□ No
✓ Don't know
If no, please tell us what you consider should change and why?
7. Do the existing LDP policies (ED1-5) adequately encourage new employment sites and businesses?
☐ Yes
□ No
✓ Don't know
If no, please tell us what you consider should change and why?
CITY AND TOWN CENTRES 8. 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?
✓ Yes
No
Don't know
If no please tell us for which town(s) and why you consider this to be the case.

RESIDENTIAL DEVELOPMENT 9. Do policies RD1-6 provide a satisfactory framework for consideration of residential development within Perth & Kinross?
Yes
□ No
✓ Don't know
Please give your reason(s) for your answer.
LOW CARBON TRAVEL, HEAT AND POWER 10. 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 policy ER1, Transport policy TA1 and Climate Change, Carbon Reduction and Sustainable Construction policy EP1 of the existing LDP need updating to enable Perth & Kinross Council to fulfill its obligations in this respect?
☐ Yes
□ No
✓ Don't know
If yes, please tell us what changes you consider would be appropriate and why?
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RESOURCE SECURITY
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12. Are other Natural Resources adequately protected by the LDP Policies (ER3)?
Yes
□ No
☑ Don't know
If no, explain what aspects of the policy you consider should be altered and why?
GREEN/BLUE NETWORKS
Green/Blue spaces and networks include any area of open space whether public or private; gardens, parks, woodlands and hedgerows. These are all important. It also includes water systems such as rivers, lakes and ponds, and the coastline.
Networks refer to the interlinking of these spaces and features all of which have a host of benefits, for both people and biodiversity, e.g. Being utilised for travel to work (such as a footpath network), for leisure (e.g. parkland, woodland, sea-shore)
or perhaps providing a habitat for important species.
13. Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately protect and
promote green and blue networks?
∐ Yes □ No
☑ No Don't know
V Soft Mov
If you answered no, please help us by explaining how they should be changed, and your reason(s).
OTHER ISSUES 14. Have we missed any land use planning issue which you consider the revised LDP2 should cover?
✓ Yes
□ No
☐ Don't know

If yes, please detail below, and give reasons for your suggestion(s). With regards to '3.7 Community Facilities, Sport and Recreation', The Trust supports the intent of the section, particularly Policy CF3: Social and Community Facilities, which aims to resist the loss of community facilities. The Trust, however, recommends that the policy in the new LDP is strengthened by including a clear definition for 'Social and Community Facilities'. We suggest: 'Social and community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.' SUPPLEMENTARY GUIDANCE 15. Does the existing LDP have the right balance between Policies and Supplementary Guidance (SG), and does the SG cover the right topic areas? Yes ☐ No ✓ Don't know If no, please detail how you think the balance should change &/or which topic areas should be included/excluded, together with your reason(s). **PART 3 DECLARATIONS** / I /the agent accept that details of these issues may be publicised as part of consultation on this and future phases of the preparation of the Local Development Plan. Signature I/ the agent certify that this is a submission for the Call for Issues process as part of Perth and Kinross Local Development Plan. I hereby confirm that the information given in this form is true and accurate to the best of my knowledge (for electronic submissions, please confirm your statement by ticking the box instead of providing signature). Signature: Ross Anthony Name: Ross Anthony

Any personal data that you have been asked to provide on this form will be held and processed in accordance with the requirements of the 1998 Data Protection Act.

27 March 2015

Date:

36. How did you find out about the call for sites process? optional question.			
Councils website			
Notice in Newspaper, could you tell us which one below?			
PKC Development Plan Scheme			
Telephone enquiry to Council			
Email enquiry to Council			
Social Media (e.g. Twitter, Facebook)			
Other, could you tell us how below?			
Further information			

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Perth and Kinross Local Development Plan

Call for Issues

20 January - 31 March 2015

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PART 1 APPLICANT AND SITE DETAILS

1. Agents Details (if any)		2. Your details	
Name		Name	Robert Cairncross
Company		Company	Portmoak Community Council
Building No./Name		Building No./Name	
Address		Address	
Town/City		Town/ City	
Postcode		Postcode	
Telephone		Telephone	
Mobile		Mobile	
Email		Email	
3. Who is the main contact f	for this submission?		
☐ Agent ✓ You			

PART 2 IDENTIFYING ISSUES

CLIMATE CHANGE 4. 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 <u>EP1</u> & <u>EP2</u> (and associated <u>Supplementary Guidance</u>) of the existing Local Development Plan (LDP) adequately address this issue?
✓ Yes
□ No
☐ Don't know
If no, tell us what change you would like to see, and why?
HEALTHIER LIVES 5. 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?
Yes
✓ No
☐ Don't know
If yes, please tell us what change you would like to see and why?

BUSINESS, TOURISM AND LESIURE 6. Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and businesses?
Yes
✓ No
Don't know
If no, please tell us what you consider should change and why?
The Council will give favourable consideration to the expansion of existing businesses and the creation of new ones in rural areas (policy ED3). However, without some flexibility, this may be difficult to achieve in settlements where, as a result of tightly drawn boundaries, there is no space for such development.
7. Do the existing LDP policies (<u>ED1-5</u>) adequately encourage new employment sites and businesses?
✓ Yes
□ No
Don't know
If no, please tell us what you consider should change and why?
CITY AND TOWN CENTRES 8. 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?
Yes
□ No
☑ Don't know
If no please tell us for which town(s) and why you consider this to be the case.

RESIDENTIAL DEVELOPMENT 9. Do policies RD1-6 provide a satisfactory framework for consideration of residential development within Perth & Kinross?
Yes
✓ No
☐ Don't know
Please give your reason(s) for your answer.
Please see the Supplementary Sheet: Review of Housing Provision (Q14.3) detailing comments on 5 points:
 a. Windfall housing - with recommendation. b. Affordable housing - with recommendation. c. Diversity of housing stock:- with recommendation. d. Site H54 (Scotlandwell, 2014 LDP) for 30 one and half storey houses - with recommendation. e. Conservation areas - with recommendation.
LOW CARBON TRAVEL, HEAT AND POWER 10. 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 policy ER1, Transport policy TA1 and Climate Change, Carbon Reduction and Sustainable Construction policy EP1 of the existing LDP need updating to enable Perth & Kinross Council to fulfill its obligations in this respect?
✓ Yes
No
☐ Don't know
If yes, please tell us what changes you consider would be appropriate and why?
Please see Supplementary sheet: Review of Transport (Q.14.4) detailing comment on two points:
a. Low Carbon Travel (policy TA1) - with recommendation; and
b. Transit of the A911 by HGVs - with recommendation.
RESOURCE SECURITY 11. Existing policy <u>ER3</u> 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?
There is a need for specific Supplementary Guidance to reflect developing policy on Fracking and related extraction activities.

12. Are other Natural Resources adequately protected by the LDP Policies (ER3)?
Yes
□ No
✓ Don't know
If no, explain what aspects of the policy you consider should be altered and why?
GREEN/BLUE NETWORKS
Green/Blue spaces and networks include any area of open space whether public or private; gardens, parks, woodlands and hedgerows. These are all important. It also includes water systems such as rivers, lakes and ponds, and the coastline. Networks refer to the interlinking of these spaces and features all of which have a host of benefits, for both people and biodiversity, e.g. Being utilised for travel to work (such as a footpath network), for leisure (e.g. parkland, woodland, sea-shore) or perhaps providing a habitat for important species.
13. Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately protect and promote green and blue networks?
✓ Yes
□ No
☐ Don't know
If you answered no, please help us by explaining how they should be changed, and your reason(s).
OTHER ISSUES 14. Have we missed any land use planning issue which you consider the revised LDP2 should cover?
✓ Yes
□ No
☐ Don't know

If yes, please detail below, ar	nd give reasons for your suggestion(s).
Please see Supplementary s	sheet:
Long term of Stephen's Field Review of Settlement Bound Environment and Conservat	daries (14.2) and
Detailed comment is provide	e on each.
SUPPLEMENTARY GUIDAN 15. Does the existing LDP I the SG cover the right topic	nave the right balance between Policies and Supplementary Guidance (SG), and does
✓ Yes	
□ No	
☐ Don't know	
If no, please detail how you th with your reason(s).	hink the balance should change &/or which topic areas should be included/excluded, together
PART 3 DECLARATIONS	
	letails of these issues may be publicised as part of consultation on this and future phases Local Development Plan.
Signature	
Development Plan. I here	is is a submission for the Call for Issues process as part of Perth and Kinross Local eby confirm that the information given in this form is true and accurate to the best of my c submissions, please confirm your statement by ticking the box instead of providing
Signature:	
Name:	Robert G Cairncross
Date:	29 March 2015
- 4.5.	20 Maron 2010

Any personal data that you have been asked to provide on this form will be held and processed in accordance with the requirements of the 1998 Data Protection Act.

36. How did you find out about the can for sites process? optional question.
Councils website
Notice in Newspaper, could you tell us which one below?
PKC Development Plan Scheme
Telephone enquiry to Council
Email enquiry to Council
Social Media (e.g. Twitter, Facebook)
Other, could you tell us how below?
Furtherinformation

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Portmoak Community Council: Call for Issues - Supplementary Paper, 29th March 2015

"Q14 Have we missed any land use planning issues which you consider the revised LDP2 should cover?"

No	Issue	Reasoning	
14.1	Long term inclusion of "Stephen's Field" within the Kinnesswood Settlement and to be protected as a village amenity area (please see accompanying map).	a.	Land at Stephen's Field, Kinnesswood: This is an area of land to the east of the Whitecraigs development, Kinnesswood. It extends to some 7 hectares. (Please see attached Map) The Community Council is currently seeking the views of the community on whether to push for the fulfilment of the suspensive condition in their contract with A & J Stephen Ltd to assume ownership of this land.
			The Community Council (CC) recommends that : whether ownership by the Community Council does or does not occur, this land should be incorporated within the Kinnesswood settlement boundary and zoned to protect amenity value.
14.2	Review of Settlement Boundaries	a.	Clarification of policy PM4: The Council appreciates that there are advantages in drawing settlement boundaries tightly around small settlements where that precludes development except within the defined settlement boundary. It recognises, however, that there can be sound reason to allow such development (other than for windfall or other housing) where, for example, it supports the development of necessary infrastructure that may benefit the whole community. The CC recommends that: Policy PM4 be reviewed.
14.3	Review of Housing Provision	a.	Windfall housing: PKC estimates that the contribution of windfall sites to the overall supply is expected to be no more than 10% of the land supply. In Portmoak since 2010 it is estimated that windfall sites have contributed around 53% of land supply and that, looking to the future, over the next five years it is likely to be of the order of 58%. Portmoak continues to grow - its current population is circa 1,400.
			The CC recommends that this imbalance in planning is acknowledged and that specifically the effect of windfall housing on local infrastructure is recognised.
		b.	Affordable housing : While the policy on affordable housing is welcomed (policy RD4), in a small rural area such as Portmoak this does not translate into a

Portmoak Community Council: Call for Issues - Supplementary Paper, 29th March 2015

"Q14 Have we missed any land use planning issues which you consider the revised LDP2 should cover?"

No	Issue	Reasoning	
			balanced supply of new affordable housing.
			The CC recommends that new residential planning in Portmoak should seek to provide such a supply of affordable housing in balance with other new housing.
		c.	Diversity of housing stock: Current new residential builds in Portmoak all tend to be large 3-4 bed villas.
			The CC recommends that a balance of smaller housing be provided (often single storey), from whatever source, that may better meet the requirements of: an ageing society who may wish to "down-size" to such a property while remaining in the community; younger people wishing starter homes; and single people.
		d.	Site H54 (Scotlandwell, 2014 LDP) for 30 one and half storey houses: There is a developer proposal for a modest increase in the agreed site size for this development to have the effect of reducing housing density.
			The Community Council would support this provided: the number of houses was not increased; the house size does not exceed true one and half storeys; the outlook from the conservation area at Friar Place is not compromised; the mix of housing types including low cost housing as set out in the 2014 plan is respected and there is a contribution to a community benefit (e.g. public car parking or towards a revised and safe footpath from Scotlandwell along the A911 to the Church and Hall).
		e.	Conservation areas The Community Council supports Policy HE3A: New Development in Conservation Areas but is concerned that it may not always be applied.
			The CC recommends that, in preserving or enhancing the character or appearance of a conservation area, there is a need to emphasise the Policy "development outwith an area that will impact upon its special qualities should be appropriate to its appearance."
14.4	Review of Transport	a.	Low Carbon Travel (policy TA1): With limited public transport Portmoak is a rural

Portmoak Community Council: Call for Issues - Supplementary Paper, 29th March 2015

"Q14 Have we missed any land use planning issues which you consider the revised LDP2 should cover?"

No	Issue	Re	asoning
	 a. Safe footpaths and public car parking in Kinnesswood and Scotlandwell b. Through HGV traffic of the A911 		area with a necessary demand for car transport. While there is some core path and cycle route provision, pedestrian access is restricted by unsafe, narrow or absent footpaths within Portmoak settlements. This is particularly so along the A911 at the north entrance to Scotlandwell. Provisions for car parking in Scotlandwell, set out in the 2004 LDP and again in the 2014 LDP, have never been met compromising both access to the Portmoak Moss at Scotlandwell and more broadly the sustainability of the community.
			It is recommended that car parking provision be reviewed when considering developments in Portmoak and particularly in Scotlandwell and that attention be given to securing safe passage for pedestrians within Portmoak settlements.
		b.	Transit of the A911 by HGVs: The A911 is a narrow A class road with necessary traffic calming arrangements in its two main settlements. The significant numbers of HGVs that transit the Portmoak have difficulty negotiating the six traffic calming build-outs and the sharp right hand corner at the heart of Scotlandwell.
			It is recommend that arrangements to divert through HGV traffic from the A911 as it passes through Portmoak be introduced.
14.5	Environment and Conservation - Local Designation.	a.	Review of Policy NE1C Environment and Conservation: The Living Lomonds Landscape Partnership has been effective in taking its work beyond the boundaries of the Fife Regional Park and influencing substantial parts of Portmoak.
			The Community Council recommends that, notwithstanding the integrity of local authority boundaries, local designation of the upland area coterminous with the Fife Regional Park should be considered.



Perth and Kinross Local Development Plan

Call for Issues

20 January - 31 March 2015

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PART 1 APPLICANT AND SITE DETAILS

1. Agents Details (if any)		2. Your details	
Name		Name	Jim Pritchard
Company		Company	N/A
Building No./Name		Building No./Name	
Address		Address	
Town/City		Town/ City	
Postcode		Postcode	
Telephone		Telephone	
Mobile [Mobile	
Email [Email	
3. Who is the main contact f	for this submission?		
Agent Vou			

PART 2 IDENTIFYING ISSUES

4. 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 <u>EP1</u> & <u>EP2</u> (and associated <u>Supplementary Guidance</u>) of the existing Local Development Plan (LDP) adequately address this issue?					
Yes					
□ No					
☑ Don't know					
If no, tell us what change you would like to see, and why?					
HEALTHIER LIVES 5. 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?					
Yes					
□ No					
✓ Don't know					
If yes, please tell us what change you would like to see and why?					

BUSINESS, TOURISMAND LESIURE 6. Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and businesses?
Yes
□ No
✓ Don't know
If no, please tell us what you consider should change and why?
7. Do the existing LDP policies (ED1-5) adequately encourage new employment sites and businesses?
Yes
□ No
✓ Don't know
If no, please tell us what you consider should change and why?
CITY AND TOWN CENTRES
8. 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?
Yes
□ No
✓ Don't know
If no please tell us for which town(s) and why you consider this to be the case.
If no please tell us for which town(s) and why you consider this to be the case.

RESIDENTIAL DEVELOPMENT 9. Do policies RD1-6 provide a satisfactory framework for consideration of residential development within Perth & Kinross?
Yes
☐ No
□ Don't know
Please give your reason(s) for your answer.
LOW CARBON TRAVEL, HEAT AND POWER 10. 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 policy <u>ER1</u> , Transport policy <u>TA1</u> and Climate Change, Carbon Reduction and Sustainable Construction policy <u>EP1</u> of the existing LDP need updating to enable Perth & Kinross Council to fulfill its obligations in this respect?
☐ Yes
□ No
☑ Don't know
If yes, please tell us what changes you consider would be appropriate and why?
RESOURCE SECURITY 11. Existing policy <u>ER3</u> 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?

12. Are other Natural Resources adequately protected by the LDP Policies (ER3)?
Yes
□ No
☑ Don't know
If no, explain what aspects of the policy you consider should be altered and why?
GREEN/BLUE NETWORKS
Green/Blue spaces and networks include any area of open space whether public or private; gardens, parks, woodlands and hedgerows. These are all important. It also includes water systems such as rivers, lakes and ponds, and the coastline. Networks refer to the interlinking of these spaces and features all of which have a host of benefits, for both people and biodiversity, e.g. Being utilised for travel to work (such as a footpath network), for leisure (e.g. parkland, woodland, sea-shore) or perhaps providing a habitat for important species.
13. Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately protect and promote green and blue networks?
Yes
□ No
☑ Don't know
If you answered no, please help us by explaining how they should be changed, and your reason(s).
OTHER ISSUES 14. Have we missed any land use planning issue which you consider the revised LDP2 should cover?
✓ Yes
□ No
☐ Don't know

If yes, please detail below, and give reasons for your suggestion(s).

CLIDDLEMENTARY CLUDANCE

- 1. The loss of the AGLV designation from the Naemoor area in Crook of Devon under the current plan was very disappointing. This designation was supposed to be replaced by an alternative designation (Local Landscape Areas) that would afford an equivalent level of protection. However, I understand that Councillors recently voted against the extension of the Local Landscape Areas to include the Cleish Hills, River Devon Gorge, Lochleven, Ochil Hills and Portmoak. I am very disappointed to hear this news and would like this issue reconsidered in the Main Issues Report. Our landscape is a huge asset, which is very important for the tourism trade in the area. Not affording protection to this natural asset would be a grave mistake that would not only affect the quality of life of constituents but would also fail to safeguard the revenue that tourism brings to the area.
- 2. I note that the Monarch Deer Farm on Naemoor Road in Crook of Devon is no longer within the settlement boundary in the current Local Plan and I would like to see Policy PM4 upheld robustly by PKC. I am pleased that the site is not designated for housing development. It should be noted that the last planning application for the site was refused and that there was significant local opposition to development at this location. Local residents, including myself, are opposed to the site coming forward as a future development site.

15. Does the existing LDP I the SG cover the right topic	have the right balance between Policies and Supplementary Guidance (SG), and does
Yes	
☐ No	
☑ Don't know	
If no, please detail how you the with your reason(s).	hink the balance should change &/or which topic areas should be included/excluded, together
PART 3 DECLARATIONS	i
	details of these issues may be publicised as part of consultation on this and future phases Local Development Plan.
Signature	
Development Plan. I her	nis is a submission for the Call for Issues process as part of Perth and Kinross Local eby confirm that the information given in this form is true and accurate to the best of my c submissions, please confirm your statement by ticking the box instead of providing
Signature:	
Name:	Jim Pritchard
Date:	28/03/2015

Any personal data that you have been asked to provide on this form will be held and processed in accordance with the requirements of the 1998 Data Protection Act.

36. How did you find out about the can for sites process? Optional question.		
Councils website		
Notice in Newspaper, could you tell us which one below?		
PKC Development Plan Scheme		
Telephone enquiry to Council		
Email enquiry to Council		
Social Media (e.g. Twitter, Facebook)		
Other, could you tell us how below?		
Furtherinformation		

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Or alternatively by post to:

Local Development Plan Team Perth and Kinross Council Pullar House 35 Kinnoull Street Perth PH1 5GD

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From:

TES Development Plan - Generic Email Account

Subject: Date: P&K Local Development Plan 29 March 2015 10:45:12

Brenda Murray,
Perth & Kinross Council

Dear Ms Murray,

P&K Local Development Plan 2018-22 Call for Issues/Sites

I refer to your emailed letter of 20th January 2015 seeking information about potential sites for housing development in Highland Perthshire. However, this letter concerns land which I believe should be **excluded** from development (except perhaps for eg infill sites etc.)

I refer to the settlement of Boltachan, east of the Boltachan Burn, specifically land accessed by the private (unmetalled) track which leads from the minor public road from Weem to Strathtay village up to the Glassie Farm bunkhouse.

Reasons for excluding this land from further development include the following.

*Absence of public sewerage/drainage.

*Glassie access road is regularly inaccessible in winter time (due to snow/ice and steepness of incline) other than by 4x4 vehicles, with implications for public and emergency services. Accessibility is also restricted by the risk of closure of the Aberfeldy/Weem road due to flooding.

*Increase in traffic over Wade Bridge to/from Aberfeldy (single line controlled by traffic lights).

*Danger of accidents at junction of Glassie access road with public road due to poor visibility/sight lines.

*Weak water pressure.

*Lack of space for more rubbish bins at foot of access road (exacerbated by car parking by clients of Bunkhouse unable/unwilling to negotiate the track up to the Bunkhouse.

Yours sincerely,

Will Fraser,





Perth and Kinross Local Development Plan

Call for Issues

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PART 1 APPLICANT AND SITE DETAILS

1. Agents Details (if any)		2. Your details		
Name		Name	Alex Pritchard	
Company		Company	N/A	
Building No./Name		Building No./Name		
Address		Address		
Town/City		Town/ City		
Postcode		Postcode		
Telephone		Telephone		
Mobile		Mobile		
Email		Email		
3. Who is the main contact for this submission? Agent You				

PART 2 IDENTIFYING ISSUES

CLIMATE CHANGE 4. 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 <u>EP1</u> & <u>EP2</u> (and associated <u>Supplementary Guidance</u>) of the existing Local Development Plan (LDP) adequately address this issue?
Yes
□ No
✓ Don't know
If no, tell us what change you would like to see, and why?
HEALTHIER LIVES 5. 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?
Yes
□ No
✓ Don't know
If yes, please tell us what change you would like to see and why?

BUSINESS, TOURISM AND LESIURE 6. Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and businesses?
Yes
□ No
✓ Don't know
If no, please tell us what you consider should change and why?
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CITY AND TOWN CENTRES 8. 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?
Yes
□ No
✓ Don't know
If no please tell us for which town(s) and why you consider this to be the case.

RESIDENTIAL DEVELOPMENT 9. Do policies RD1-6 provide a satisfactory framework for consideration of residential development within Perth & Kinross?
Yes
□ No
✓ Don't know
Please give your reason(s) for your answer.
LOW CARBON TRAVEL, HEAT AND POWER 10. 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 policy ER1, Transport policy TA1 and Climate Change, Carbon Reduction and Sustainable Construction policy EP1 of the existing LDP need updating to enable Perth & Kinross Council to fulfill its obligations in this respect?
☐ Yes
□ No
✓ Don't know
If yes, please tell us what changes you consider would be appropriate and why?
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Yes
□ No
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If no, explain what aspects of the policy you consider should be altered and why?
GREEN/BLUE NETWORKS
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or perhaps providing a habitat for important species.
13. Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately protect and
promote green and blue networks?
∐ Yes □ No
☑ No Don't know
V Soft Mow
If you answered no, please help us by explaining how they should be changed, and your reason(s).
OTHER ISSUES 14. Have we missed any land use planning issue which you consider the revised LDP2 should cover?
✓ Yes
□ No
☐ Don't know

If yes, please detail below, and give reasons for your suggestion(s).
1. I am pleased that Monarch Deer Farm on Naemoor Road in Crook of Devon is not designated for housing development in the current Local Plan. The community have long opposed the development of this area both now and in the future. I note that this area is now not within the settlement boundary and in accordance with Policy PM4 development will not be permitted. I support the continuation of the 'no development proposal' for this area.
2. I am disappointed that the Naemoor area in Crook of Devon has lost its status as an AGLV and that this has not been designated as a Local Landscape Areas. This is a very beautiful area which is important to the community and the wider population and is vital for recreation and tourism. I would like to see this issue reconsidered in the Main Issues Report.
SUPPLEMENTARY GUIDANCE 15. Does the existing LDP have the right balance between Policies and Supplementary Guidance (SG), and does the SG cover the right topic areas?
Yes
□ No
☑ Don't know
If no, please detail how you think the balance should change &/or which topic areas should be included/excluded, together with your reason(s).
PART 3 DECLARATIONS
I /the agent accept that details of these issues may be publicised as part of consultation on this and future phases of the preparation of the Local Development Plan.
Signature
I/ the agent certify that this is a submission for the Call for Issues process as part of Perth and Kinross Local Development Plan. I hereby confirm that the information given in this form is true and accurate to the best of my knowledge (for electronic submissions, places confirm your statement by ticking the box instead of providing

Any personal data that you have been asked to provide on this form will be held and processed in accordance with the requirements of the 1998 Data Protection Act.

Alex Pritchard

29/03/2015

signature).

Signature:

Name:

Date:

36. How did you find out about the call for sites process? optional question.		
Councils website		
Notice in Newspaper, could you tell us which one below?		
PKC Development Plan Scheme		
Telephone enquiry to Council		
Email enquiry to Council		
Social Media (e.g. Twitter, Facebook)		
Other, could you tell us how below?		
Further information		

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PART 1 APPLICANT AND SITE DETAILS

1. Agents Details (if any)		2. Your details	
Name	Angus Dodds	Name	
Company	Smiths Gore	Company	
Building No./Name	22	Building No./Name	
Address	Young Street	Address	
Town/City	Edinburgh	Town/ City	
Postcode	EH104PA	Postcode	
Telephone	0131 344 0892	Telephone	
Mobile		Mobile	
Email	angus.dodds@smithsgore.co.uk	Email	
3. Who is the main contact for this submission?			
Agent You			

PART 2 IDENTIFYING ISSUES

CLIMATE CHANGE 4. 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 <u>EP1</u> & <u>EP2</u> (and associated <u>Supplementary Guidance</u>) of the existing Local Development Plan (LDP) adequately address this issue?
Yes No Don't know
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Yes No Don't know
If yes, please tell us what change you would like to see and why?

BUSINESS, TOURISM AND LESIURE 6. Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and businesses?
Yes
□ No
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☐ Yes ☐ No
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CITY AND TOWN CENTURE
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Yes
□ No
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If no please tell us for which town(s) and why you consider this to be the case.

RESIDENTIAL DEVELOPMENT 9. Do policies RD1-6 provide a satisfactory framework for consideration of residential development within Perth & Kinross?
Yes
No
☐ Don't know
Please give your reason(s) for your answer.
LOW CARBON TRAVEL, HEAT AND POWER 10. 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 policy <u>ER1</u> , Transport policy <u>TA1</u> and Climate Change, Carbon Reduction and Sustainable Construction policy <u>EP1</u> of the existing LDP need updating to enable Perth & Kinross Council to fulfill its obligations in this respect?
Yes
□ No
☐ Don't know
If yes, please tell us what changes you consider would be appropriate and why?
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12. Are other Natural Resources adequately protected by the LDP Policies (ER3)?
Yes
□ No
Don't know
If no, explain what aspects of the policy you consider should be altered and why?
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13. Do the existing policies (<u>NE1-6</u>) and associated Supplementary Guidance of the LDP adequately protect and promote green and blue networks?
Yes
─ No
Don't know
If you answered no, please help us by explaining how they should be changed, and your reason(s).
Policy NE5 : Green Belt
Scottish Planning Policy states at paragraph 52 that:

'Local development plans should describe the types and scales of development which would be appropriate within a green belt. These may include......'

While renewable energy proposals are not included in the list, the tone of paragraph 52 indicates that the options that follow are not exhaustive. This is particularly relevant with regard to renewable energy proposals, as such developments continually evolve, and have the ability over-time to incorporate technologies that may have been commercially unviable only a few years ago.

Paragraph 5.1.3 of the Adopted LDP echoes TAYplan in stating that the purpose of the greenbelt is to: manage long-term growth, and preserve the setting, views and special character of Perth and the separate identity of Scone.

Paragraph 5.1.4 of the Adopted LDP states (among other things) that the objectives of green belt policy include: controlling the spread of built development, and facilitating the creation of green corridors with improved biodiversity. The National Planning Framework 3 (paragraph 4.7) states that 'We have long sought to protect Scotland's environment, recognising that it is a dynamic resource rather than a fixed asset. To better reflect this, more proactive and innovative environmental stewardship is required.' The document further goes on to state (paragraph 4.12) that 'We are committed to reversing the decline of some habitats and species and regulating environmental pollution.'

In the case of well sited ground mounted solar PV arrays, there are opportunities for such developments to be permitted within the green belt in accordance with SPP, NPF3 and the objectives and Strategy of the Adopted Local Development Plan. Well-sited Solar PV developments offer opportunities to establish habitat beneath the arrays, while the modules themselves remain hidden from public views. As these developments are both temporary and removable, they do not leave any brownfield legacy encouraging future built development on these temporary sites. By contrast, through careful landscape management, habitat can become established during the period when the development quietly generates low-impact renewable energy. Once removed, such enhanced habitat will make a positive contribution to the green belt, and the location of any such evolving habitat can be taken into account when long-term planning of the wider green network is undertaken.

Enhancement of local wildlife and improvements to biodiversity can be designed into such projects through the introduction of wide ecological corridors, bird boxes and bug hotels, and through the retention of field boundaries such as hedgerows. Furthermore, grass and wildflower mix can be introduced between the rows of panels to encourage further

biodiversity enhancements, or such land can continue to stay in agricultural use throughout the period the modules are installed in the form of animal grazing beneath the modules.

In relation to policy NE5 therefore it is considered that there are opportunities within the green belt where appropriate forms of renewable energy can be developed now and in the future, which would accord with the objectives of the green belt, and help accelerate improvements to biodiversity therein. As presently drafted, there is no explicit policy support for such development, even when it can be demonstrated that this would support the objectives of the green belt in all other regards. It would therefore be helpful for appropriate forms of renewable energy development to be added as a further qualifying criterion under policy NE5. The following wording is proposed to follow criterion (c):

(d) 'It constitutes uses which advance the Council's Local Development Plan Strategy in support of the development of renewable and low carbon energy, where these can be designed in such a way that biodiversity will be enhanced and/or agricultural uses will continue to take place. Any such proposals shall demonstrate that they accord with the overriding objectives of the green belt, and are appropriate to the character of the green belt.'

OTHER ISSUES 14. Have we missed any land use planning issue which you consider the revised LDP2 should cover?
Yes
□ No
☐ Don't know
If yes, please detail below, and give reasons for your suggestion(s).
SUPPLEMENTARY GUIDANCE 15. Does the existing LDP have the right balance between Policies and Supplementary Guidance (SG), and does the SG cover the right topic areas?
Yes
□ No
☐ Don't know
If no, please detail how you think the balance should change &/or which topic areas should be included/excluded, together with your reason(s).

PART 3 DECLARATIONS

I /the agent accept that details of these issues may be publicised as part of consultation on this and future phases of the preparation of the Local Development Plan.		
Signature		
Development Plan. I here	is is a submission for the Call for Issues process as part of Perth and Kinross Local eby confirm that the information given in this form is true and accurate to the best of my submissions, please confirm your statement by ticking the box instead of providing	
Signature:		
Name:	Angus Dodds	
Date:	30/03/2015	
requirements of the 1998 Dat 36. How did you find out ab	ave been asked to provide on this form will be held and processed in accordance with the a Protection Act. out the call for sites process? optional question.	
Councils website		
Notice in Newspaper, could you tell us which one below?		
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Email enquiry to Council		
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Furtherinformation		

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Local Development Plan Team Perth and Kinross Council Pullar House 35 Kinnoull Street Perth PH1 5GD

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From:

To: TES Development Plan - Generic Email Account

Cc:

Cc: Subject:

New Local Development Plan (LDP2)

Date: 30 March 2015 12:08:32

Comments by JHR Hampson,

1. Due attention should be paid to protecting the Loch Leven Basis in its entirety by prescribing that the following types of development will not be permitted within the area prescribed in the SLA:

Buildings over 2 storey

Masts over 3m

Wind turbines

Industry

Fracking within 20 kilometres of the loch

2. The following settlement boundaries should be preserved

Scotlandwell

Kimagadwood

Woodmarch

- 3. The following open space should be protected from development of any sort Area between Portmoak Church and Scotlandwell on the south side of the A911 Area between Kilmagadwood and Woodmarch
- 4. The Lomond Country Inn is now derelict. Steps should be taken to demolish the buildings as a matter of some urgency. Details of the engineering are provided in the Engineers Report pertaining to Planning Application 14/00707/FLL

Jim Hampson

Question 4: Climate Change

Policy EP1A

We require that the wording for this policy is amended to state that the avoidance of the disturbance and associated loss of carbon rich soil (CRS) in any location is preferred in the first instance to protect carbon stores and clarifies that where exceptions set out in the existing policy allow for development in areas of CRS, development should be informed by:

- o an appropriate peat survey and management plan;
- o any disturbance or excavation be minimised; and,
- o suitable mitigation measures implemented to abate carbon emissions.

In addition we recommend that reference is made in the policy to relevant mapped data sources, and that this data is included in mapping work to highlight that sites located in areas where CRS are present will need to undertake further site investigation in accordance with the bullet points above. The Scotland Soils carbon richness map available at http://www.soils-scotland.gov.uk/data/soil-carbon is taken at the current time to be the most comprehensive data available with Categories 5 and 6 soils indicating the presence of carbon rich soils. SNH are however currently compiling an updated mapped resource which will replace the existing map in due course.

The reason for this requirement is that disruption of areas of carbon rich soil by development can result in the loss of the stored carbon through release of greenhouse gases to the atmosphere. This is contrary to the target of reducing the emission of greenhouse gases set out in Part 1 of the Climate Change (Scotland) Act 2009 (CC Act) and efforts to mitigate climate change by reducing greenhouse gas emissions at source.

The need to protect carbon stores in carbon rich soil accords with climate change mitigation principles and with your Authority's duties under Section 44 Climate Change (Scotland) Act 2009. These requirements accord with the following documents:

NPF3 para 4.9

Scotland's Land Use Strategy principle 6

SPP paras 29 and 161

Scottish Soils Framework Soil Outcome 4 and

Climate Change Delivery Plan 2009 section 2.3 which sets out the four transformational outcomes which the Scottish Government is working towards to meet the 80% reduction of 1990 GHG emission limits by 2050. One of these is a comprehensive approach to ensure that carbon (including the cost of carbon) is fully factored into strategic and local decisions about rural land use through: appropriate protection for Scotland's carbon rich soils<extract>

Examples of relevant policy coverage can be found in Stirling Council's adopted LDP Policy 4.2: Protection of Carbon-Rich Soils, Orkney LDP Policy N6: Protection of soil resources

Policy EP1 and Sustainable Design and Zero Carbon Development SG

We recommend that the issue of protecting soils is included within Policy EP1, the Sustainable Design and Zero Carbon Development SG and the associated Sustainability checklist.

The Scottish Soil Framework recognises soil as a finite, non-renewable resource. Soil performs a wide range of important functions including carbon storage and biomass production; acting as a filter and buffer to pollutants; absorbing water and therefore providing resilience for high intensity rainfall; absorbing heat and therefore contributing to reducing heat island effect and associated energy demands for cooling of buildings and as a spatial base for the erection of built development.

Soil is therefore a key part of our environment and soil degradation caused by soil sealing, loss of organic matter, erosion, and loss of biodiversity can have implications for air and water quality as well as our climate and biodiversity. Sustainable management and protection of soils is therefore key to ensuring that soils can deliver essential functions.

The inclusion of protection of soil as a resource accords with your Authority's duties under Section 44 Climate Change Act, NPF3 para 4.9, Land Use Strategy Principle 6. In addition Scottish Soil Framework outcomes 1-5 are relevant and SPP para 194 states "The planning system should <extract from list> seek to protect soils from damage such as erosion or compaction"

Relevant information is available from our website and the following documents with an example of relevant policy coverage found in Stirling Council adopted LDP Primary Policy 14. We are available to support your authority on this, and all other issues raised in the response.

- Making the Case for soil
- http://sepa.org.uk/making_the_case/soil.aspx
- DEFRA Code of practice for the sustainable use of soils on construction sites https://www.gov.uk/government/publications/code-of-practice-for-the-sustainable-use-of-soils-on-construction-sites
- Natural Scotland Regulatory guidance Promoting the sustainable reuse of greenfield soils in construction

http://www.sepa.org.uk/waste/waste_regulation/idoc.ashx?docid=f2099206-fe50-448e-8eb4-4d90289fade4&version=-1

- SNIFFER (2004) Planning for soil: Advice on how the planning system can help protect and enhance soils
- http://www.sniffer.org.uk/files/4313/4183/8002/UKLQ01 Good practice guidance.pdf
- Overview of best practices for limiting soil sealing or mitigating its effects in EU-27 http://ec.europa.eu/environment/soil/sealing.htm
- European Commission working staff document: Guidelines on best practice to limit, mitigate or compensate soil sealing:

http://ec.europa.eu/environment/soil/pdf/soil_sealing_guidelines_en.pdf

 European Commission Indepth Report Soil Sealing (2012): http://ec.europa.eu/environment/integration/research/newsalert/pdf/IR2.pdf

Sustainable Design and Zero Carbon Development SG - Flood Risk

It is noted that one of the key points of the SG set out on the PKC website is that the SG "considers water resource use and minimise vulnerability to flooding". However the references to flood risk within the SG are only in the context of avoiding flood risk from surface water disposal. Therefore if the document is intended to cover minimising vulnerability to flooding, the SG and associated sustainability checklist need to be expanded to include the relevant questions and text to address this issue, which we would recommend include reference to our Vulnerability guidance.

Policy EP2

In order to provide greater clarity in the policy and strengthen the commitment to the policy principles in para 255 of SPP the word "general" should be removed from the first line, and 'significant probability' defined either in policy or SG.

The terminology in the diagram associated with the policy requires to be updated to accord with the current SPP, and the policy expanded to support the delivery of relevant objectives and actions within the Flood Risk Management Strategies and Local Flood Risk Management Plans relevant to the PKC area (once published).

We recommend that commitment is made through plan policy and allocation of sites that undeveloped land behind flood protection schemes is not developed and that any redevelopment in areas at risk of flooding, including behind defences are to an equal or less vulnerable use.

We highlight to your authority that flood protection measures can reduce the probability of flooding, but they cannot eliminate it entirely. We therefore propose the above recommendations to ensure any proposed development behind a Flood Prevention Scheme (FPS) accords with sustainable flood management.

Development on previously undeveloped land behind a FPS would be contrary to taking a precautionary approach and the delivery of sustainable flood management including the principle of avoiding development in areas at risk of flooding. Furthermore such development would result in a loss of flood plain storage, be an increase in the number of people and buildings in areas at risk of flooding and increase residual risk.

We recommend that any re-development on previously developed land is limited to an equal or less vulnerable use. If development is limited in this way it could contribute to sustainable flood management and reduction in overall flood risk by reducing the impact of flooding due to less vulnerable uses or a reduced number of receptors if the land use is of equal vulnerability in areas with a residual flood risk. Such a commitment also accords with climate change adaptation by accounting for a changing climate and minimising the potential impact of flooding which may also be beneficial to health and wellbeing.

We recommend that the LDP accords with sustainable flood management by using our vulnerability guidance to inform spatial decisions and making a policy commitment that development should accord with the vulnerability guidance matrix of flood risk.

The vulnerability guidance provides a classification of the relative vulnerability of land uses to flood risk taking account of their relative susceptibility and resilience to flooding and any wider community impacts caused by their damage or loss and a matrix of flood risk based on SPP risk framework and land use vulnerability classification.

The inclusion of these recommendations accords with sustainable flood management by promoting the avoidance of vulnerable uses in areas at flood risk and climate change adaptation by promoting resilience of development to flood risk. In addition it accords with para 254 of SPP which states that "Planning can play an important role in reducing the vulnerability of existing and future development to flooding." and NPF para 4.24 "Given its long-term perspective, planning is well placed to deliver adaptation measures that build the resilience of our homes, businesses and infrastructure to our changing climate."

We will provide detailed comments to your authority with regards the FRA guidance as soon as possible. The reason for the delay is that we are awaiting internal sign off on our position with regards surface water flooding. The outcome of which will influence our comments with on the detailed FRA guidance.

Question 5: Healthier Lives

We recommend that good air quality is recognised in the policy as an element of sustainable place making which contributes towards health and well being.

The inclusion of this issue accords with the vision in NPF3 for a Successful, Sustainable place which states We have a growing low carbon economy which provides opportunities that are more fairly distributed between, and within, all our communities. We live in high quality, vibrant and sustainable places with enough, good quality homes. Our living environments foster better health...

as well as

quality.

SPP para 29 This means that policies and decisions should be guided by the following principles: (extract from list)

\[\text{a voiding over} \text{development}, \text{ protecting the amenity of new and existing development and considering the implications of development for water, air and soil

Further relevant information is available from the following links:

- Environmental Protection document entitled "Development Control: planning for air quality 2010 update" Section 7 is useful for suggested mitigation to air quality issues which could be incorporated into place making supplementary guidance http://www.iagm.co.uk/text/guidance/epuk/ag_guidance.pdf
- Air Pollution: Action in a Changing Climate (DEFRA)
 https://www.gov.uk/government/publications/air-pollution-action-in-a-changing-climate
- Environment Protection UK produced guidance in 2011 Section 7 relates to impacts on air quality and climate change impacts of measure taken to address both sets of emissions: Air Quality and Climate Change Guidance for Local Authorities http://www.environmental-protection.org.uk/wp-content/uploads/2013/07/aq_and_cc_guidance.pdf

In addition relevant coverage is provided in Glasgow Proposed LDP 2014 Policy CDP1: The Placemaking Principle and Section 5.4.5 of Stirling Council's Place making guidance

Please see question 13 for response regarding green infrastructure SG

Question 10: Low carbon travel, heat and power

Policy ER1

As per our response to Question 4 the wording of part e should be expanded to clarify that effects on carbon rich soils should be minimised through avoidance in the first instance and where that is not possible through implementation of appropriate mitigation.

We recommend that reference is made to the mapped data source regarding CRS available from SNH in the development of the spatial strategy. We suggest that it

could be mapped within the LDP and related SG to identify locations of CRS which will require further consideration and the demonstration that any significant effects on the CRS can be overcome. This accords with para 161 and Table 1 in SPP.

Policy EP1

We require the inclusion of policy wording which supports the construction of low carbon energy distribution district heating networks, in accordance with the guidance in SPP paragraphs 154 and 159. The development of district heating can help to achieve GHG reduction targets by the use of low carbon heat sources, the use of excess heat from existing processes and increased energy efficiency from industrial scale boilers.

It is noted that the adopted LDP includes site specific developer requirement at strategic sites that investigation of the provision of a district heating system and combined heat and power infrastructure using renewable resources is undertaken. However the development requirements at the strategic sites should be strengthened to require the site connect to an existing or proposed district heating network, or provide a heat network within the site.

In addition new allocations located adjacent to existing or proposed new heat networks or heat supplies should include a requirement that they will be designed to be capable of connecting to the heat supply. We also recommend that this commitment is made in EP1 to ensure any development that comes forward adjacent to existing or proposed heat networks is designed to be capable of connecting to the supply. This could include incorporating space to be safeguarded for future pipework/piperuns within developments, incorporating grass/green corridors along footpaths or roads which could be excavated for installing heat network pipes without significant disturbance, and ensuring the new infrastructure does not obstruct the development of planned heat network and district heating systems.

The development plan process provides an important opportunity to ensure that district heating is incorporated into the design of development from the earliest stage. The inclusion of such a commitment would accord with SPP para 154 and 159 and aids the achievement of the Scottish Government target set out in the draft heat generation policy statement 2014 for 40,000 homes to be heated through heat networks by 2020.

To inform plan preparation we recommend your authority uses the national heat map and creates a heat map for Perth and Kinross Council area to identify opportunities to facilitate and safeguard potential heat connections, energy hubs and heat network pipelines. It is noted that the use of heat mapping in the LDP is supported by quidance in SPP paragraph 158. Local heat mapping could help your authority to identify appropriate development sites for major heat providers in order to maximise the use of the heat generated. It can also be used to identify major allocations for new developments to make use of existing and proposed heat providers, for example new employment or industrial sites could be allocated adjacent to existing landfill gas facilities. In addition the heat mapping work could also include a review of allocated sites to consider grouping potential heat network sources that could be 'clustered' to achieve viable heat networks. This can allow for economies of scale, for example more premises justifying larger and more efficient heat providers, or reducing initial outlay costs for infrastructure like pipework throughout all of the development sites. Midlothian Council is currently developing a policy which is relevant to this issue, and Fife Council has produced a heat map for their Council area, the web link to the relevant page is provided here.

http://www.fifedirect.org.uk/minisites/index.cfm?fuseaction=page.display&pageid=BC

<u>7246A0-C395-5502-EBAD04AAE7A0547C&siteID=430EB347-005B-8681-</u> 1629D8206303D4C8

In order to provide further information and guidance for developers with regards low carbon heat networks the Sustainable Design and Zero Carbon Development SG should be expanded to cover this issue.

With regards outstanding SG requirements in ER1 and EP1 the action programme identifies that the intention is to prepare and consult on the spatial framework for large-scale wind energy developments in 2015. However from a search of the PKC website it appears that the SG referred to in policies ER1 and EP1 with regards SG to further explain the locational, technological, environmental, and design requirements for developers to consider in making their applications for a range of other renewable and low carbon energy generating developments, as well as where combined heat and power technologies may be appropriate has yet to be developed, which may well be detrimental to the implementation of these policies at individual sites. In addition it is noted that the action programme states that the SG on Renewable Energy and Low Carbon Energy Generation, Climate Change, Carbon Reduction and Sustainable Construction is complete. However, the existing SG entitled Sustainable Design and Zero Carbon Development SG does not provide the further explanation of requirements for renewable and low carbon energy generating developments or where CHP may be appropriate and therefore we recommend that either the existing SG is expanded to include these issues or that additional SG is prepared to ensure that the LDP fully supports development that will work towards the GHG emission reduction targets.

An additional point with regards policy EP1 is that the terminology on part 'a' should be amended from 'water resources' to 'water environment' as this includes the ecological status of the water environment and is consistent with Water Framework Directive (WFD) terminology. The ecological status includes water quality, water quantity, ecology and physical impacts (including culverting and engineering of watercourses) and the water environment includes all surface waters (including wetlands and transitional waters) and groundwater (including drinking water supplies).

Question 11: Resource Security

Any policies relating to shale gas extraction (fracking) and coal bed methane extraction should be consistent with our development plan guidance relating to water, air and soils to ensure that there are not negative impacts on such issues insofar as they relate to our interests.

The inclusion of policy wording which protects the water environment would accord with the protection and improvement objectives of the Water Framework Directive and therefore your authority's duties as a responsible authority under Water Environment and Water Services (Scotland) Act 2003 to ensure compliance with the WFD and River Basin Planning process in carrying out their statutory functions.

A copy of our development plan guidance is available from http://www.sepa.org.uk/planning.aspx

Question 13: Green/ Blue networks

We support the policy wording with regards green and blue networks. However the strategic spatial information contained in the existing SG is somewhat difficult to

follow and therefore does not clearly highlight where the opportunities for improvement to the green network are. We concur with SNH and encourage the incorporation of existing and proposed green network into local settlement maps in the forthcoming LDP.

In addition we recommend that the SG could be expanded to highlight that soil as a resource is key to delivering the benefits of green infrastructure and green networks, and consequently that protection and development of green infrastructure contributes to the maintenance of soil functionality, including the ability of soils to filter and buffer pollutants, retain water, store heat and carbon and generate organic matter.

Question 14: Other Issues

Air Quality

Consideration of air quality should be expanded within the policy coverage of the LDP to ensure that any proposed development, which could have a detrimental impact on air quality, through exacerbation of existing air quality issues or introduction of new sources of pollution, provides appropriate mitigation measures which are agreed with your authority. It is noted that the sustainability checklist associated with EP1 already includes questions relating to whether a development would impact on air quality.

This requirement is necessary to ensure any negative impacts on air quality as a result of development are minimised. Air is a natural resource which should be protected and improved in order that it contributes to health and well being of society. This approach accords with the ecosystem service approach which recognises that the environment is a functioning ecosystem, and values the services it provides to ensure that humans can maintain a healthy and resilient natural environment. The incorporation of mitigation measures may also have a beneficial effect on greenhouse gas (GHG) emissions and therefore work towards the reduction in GHG targets set out in the Climate Change Act. Further information regarding mitigation options is available from the Environmental Protection document entitled "Development Control: planning for air quality 2010 update" Section 7 http://www.iagm.co.uk/text/quidance/epuk/ag_quidance.pdf.

Examples of relevant policy wording can be found in Aberdeen City LDP Policy NE10 – Air Quality; and Clackmannanshire proposed LDP Policy EA11 – Environmental Quality.

We also recommend that the LDP recognise the links between measures to reduce GHG emissions and improving air quality in developing the spatial strategy, strategic development sites and resulting allocations as well as relevant policy areas. We recommend that consideration is given to the impacts of alternative options and sites on air quality and greenhouse gas emissions by:

- Seeking to minimise potential negative impacts and maximise potential positive impacts in Air Quality Management Areas (AQMAs) and areas at risk of becoming an AQMA;
- Use of carbon assessment tools such as Spatial Planning Assessment of Climate Emission (SPACE);
- Consideration of other pertinent issues such as co-location of sensitive land uses with sources of emissions.
- Promoting renewable energy options that do not have a detrimental impact on local air quality.

The Scottish Government SPACE tool has been developed to help planners quantify the potential consequences, in terms of greenhouse gas emissions, of spatial planning policy decisions, to enable public authorities to fulfil their duties under the Climate Change (Scotland) Act 2009. We recommend that your authority use a carbon assessment tool such as SPACE during the development of your spatial strategy. The tool and further relevant information are available from the following weblink: http://www.gov.scot/Topics/archive/National-Planning-Policy/themes/sus-dev/SPACE

The promotion of low carbon/ renewable sources of energy which do not have a detrimental impact on air quality (for example low carbon sources which do not involve combustion (including solar, hydro, ground and air source heat) would ensure that negative effects on air quality from climate change mitigation actions are minimised. Conversely as small scale biomass in urban areas may have a detrimental impact on local air quality we recommend it is not supported, and it is noted that the Sustainable Development SG states that this type of energy production should be avoided within AQMAs. Further relevant information on the issue of air quality and climate change is available in Section 7 of Environmental Protection UK 2011 guidance entitled AQ and Climate Change Integrating policy within local authorities

http://www.iaqm.co.uk/text/guidance/epuk/aq_and_cc_guidance.pdf and the DEFRA 2010 Air Pollution: Action in a Changing Climate paper https://www.gov.uk/government/publications/air-pollution-action-in-a-changing-climate

Waste Policy Coverage

Policy EP9A

In order to allow for future growth of existing waste management facilities, policy wording should allow for the safeguarding for expansion, of land surrounding existing waste facilities to allow for growth without being prejudiced or restricted by adjoining land uses. The expansion of existing waste facilities to incorporate other technologies/more sustainable approaches/co-locate with other facilities is often a more sustainable approach rather than creating new sites in other areas where waste has not previously been processed.

Care should be taken to ensure that new allocations on adjacent sites do not compromise waste handling operations, which may operate 24 hours a day and partly outside buildings. Planning authorities should also consider the potential for co-location issues where sites are allocated adjacent to existing, proposed or allocated waste management facilities. SPP paragraph 191 provides guidance relating to buffer distances between waste management facilities and sensitive receptors, and we recommend that this is taken into account when identifying sites in development plans.

The <u>statutory guidance on the waste hierarchy</u> sets out the "preferred means" of waste management and can be used by planning authorities to inform their development plans. Indeed in order that the LDP promotes the sustainable management of waste by managing waste as high up the waste hierarchy as possible, the policies should identify the preferred means of waste management for all waste and the types of waste management facilities that will be supported. Such a commitment accords with the guidance in paragraphs 178 and 180 of SPP.

The expansion of policy coverage of part (I) of policy EP9B could provide an additional opportunity to work towards achieving green house gas reduction targets of the Climate Change Act through allowing for provision of development of heat networks. Policy wording could facilitate the inclusion, at the earliest opportunity, of the connections on appropriate waste management sites to permit the heat source to join an existing or future heat network. The wording could require waste management facilities with the potential to generate heat and/ or power be designed to enable links to be made with potential users of the heat/ power.

Minimising generation of waste from the construction phase of a development accords with Zero Waste Plan objectives and efficient use of resources. Therefore the policy wording in EP1 regarding sustainable construction should be expanded to promote this issue in accordance with guidance in SPP para 179.



Perth and Kinross Local Development Plan

Call for Issues

0 7 APR 2015

20 January - 31 March 2015

This form should be used to make a submission to the call for issues process to raise awareness of an issue for consideration in the review of the Perth and Kinross Local Development Plan. Requested information should be concise and to the point.

For help completing this form you are advised to read the associated Guidance notes or ring us on 01738 475300

PART 1 APPLICANT AND SITE DETAILS

1. Agents Details (if any)		2. Your details	
Name		Name	RHONDA DICK
Company		Company	CAUSEWAY CATTERY
Building No./Name		Building No./Name	CAUSEWAY CATTERY
Address		Address	Scotlandwell
Town/City		Town/ City	KINROSS
Postcode		Postcode	K113 970
Telephone		Telephone	
Mobile		Mobile	
Email		Email	
3. Who is the main contact	for this submission?		
Agent You			

PART 2 IDENTIFYING ISSUES

CLIMATE CHANGE 4. 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 <u>EP1</u> & <u>EP2</u> (and associated <u>Supplementary Guidance</u>) of the existing Local Development Plan (LDP) adequately address this issue?
Yes
□ No.
☐ Don't know
If no, tell us what change you would like to see, and why?
HEALTHIER LIVES 5. 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?
☐ Yes
□ <u>№</u>
Oon't know
If yes, please tell us what change you would like to see and why?

BUSINESS, TOURISM AND LESIURE 6. Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and businesses?
Yes
□ No
Don't know
If no, please tell us what you consider should change and why?
7. Do the existing LDP policies (ED1-5) adequately encourage new employment sites and businesses?
Yes
□ No
Don't know
If no, please tell us what you consider should change and why?
CITY AND TOWN CENTRES 8. 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?
Yes
□ No
Don't know
If no please tell us for which town(s) and why you consider this to be the case.

RESIDENTIAL DEVELOPMENT 9. Do policies RD1-6 provide a satisfactory framework for consideration of residential development within Perth & Kinross?
Yes
□ No
Don't know
Please give your reason(s) for your answer.
LOW CARBON TRAVEL, HEAT AND POWER 10. 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 policy ER1, Transport policy TA1 and Climate Change, Carbon Reduction and Sustainable Construction policy EP1 of the existing LDP need updating to enable Perth & Kinross Council to fulfill its obligations in this respect?
☐ Yes
Don't know
If yes, please tell us what changes you consider would be appropriate and why?
If yes, please tell us what changes you consider would be appropriate and why?
If yes, please tell us what changes you consider would be appropriate and why?
If yes, please tell us what changes you consider would be appropriate and why?
If yes, please tell us what changes you consider would be appropriate and why?
If yes, please tell us what changes you consider would be appropriate and why?
If yes, please tell us what changes you consider would be appropriate and why?
RESOURCE SECURITY 11. 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?
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12. Are other Natural Resources adequately protected by the LDP Policies (ER3)?
Yes
□ No
Don't know
If no, explain what aspects of the policy you consider should be altered and why?
GREEN/BLUE NETWORKS
Green/Blue spaces and networks include any area of open space whether public or private; gardens, parks, woodlands and hedgerows. These are all important. It also includes water systems such as rivers, lakes and ponds, and the coastline. Networks refer to the interlinking of these spaces and features all of which have a host of benefits, for both people and biodiversity, e.g. Being utilised for travel to work (such as a footpath network), for leisure (e.g. parkland, woodland, sea-shore) or perhaps providing a habitat for important species.
13. Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately protect and promote green and blue networks?
Yes
□ No
Don't know
If you answered no, please help us by explaining how they should be changed, and your reason(s).
OTHER ISSUES 14. Have we missed any land use planning issue which you consider the revised LDP2 should cover?
☐ Yes
□ No
Don't know

if yes, please detail below, a	and give reasons for your suggestion(s).
SUPPLEMENTARY GUIDAI 15. Does the existing LDP the SG cover the right top	have the right balance between Policies and Supplementary Guidance (SG), and does
Yes	
No	
Don't know	
If no, please detail how you with your reason(s).	think the balance should change &/or which topic areas should be included/excluded, together
should not be of	· · · · · · · · · · · · · · · · · · ·
	o an unreasonable restriction on surrounding Land owners heir property for Legitimate purposes.
3.20	1.1
PART 3 DECLARATIONS	
I /the agent accept that of the preparation of the	details of these issues may be publicised as part of consultation on this and future phases Local Development Plan.
Signature	
Development Plan. I her	nis is a submission for the Call for Issues process as part of Perth and Kinross Local reby confirm that the information given in this form is true and accurate to the best of my c submissions, please confirm your statement by ticking the box instead of providing
Signature:	R. Air
Name:	RHONDA DICK
Date:	30/03/2015

Any personal data that you have been asked to provide on this form will be held and processed in accordance with the requirements of the 1998 Data Protection Act.

36. now did you find out about the call for sites process? optional question.		
Councils website		
Notice in Newspaper, could you tell us which one below?		
PKC Development Plan Scheme		
Telephone enquiry to Council		
Email enquiry to Council		
Social Media (e.g. Twitter, Facebook)		
Other, could you tell us how below?		
Further information PORTMOAK COMMUNITY COUNCIL		

Completed Submission forms and location plans should be addressed to developmentplan@pkc.gov.uk

Or alternatively by post to:

Local Development Plan Team Perth and Kinross Council Pullar House 35 Kinnoull Street Perth PH1 5GD

The Call for Issues process will run from Tuesday 20 January 2015 for 10 weeks. Completed Submissions must be received by Tuesday 31 March 2015.

Draft BCCG submission to PKC LDP(2) Call for Issues

The Braes of the Carse Conservation Group (BCCG) was formed in 2009 to try and conserve the unique beauty, character and historical environment of the Braes of the Carse of Gowrie. Our Group's aim is to provide a voice for residents and interest groups in an area north of the Perth – Dundee dual carriageway (A90) approximately between Glendoick in the West and Knapp in the East.

We have more than **150** local members and thus represent a significant proportion of the population in this relatively sparsely populated area. During the preparation of the recently adopted current Local Development Plan (LDP) we extensively canvassed the views of our members (via email, letter, posters, direct contact and website survey) and our representations to both the MIR and Proposed Final Plan reflected their views. We now wish to engage in the planning process at the earliest stage possible by responding to your "Call for issues" and also reiterating our concerns about possible sites that we suspect may be resubmitted to you for consideration following your "Call for Sites".

ISSUE 1: Housing in the Countryside Policy

Our area comprises a number of small settlements some of which still have settlement boundaries in the current LDP (Rait, Kinnaird, Baledgarno), some of which "lost" their previous settlement boundaries when the current LDP was adopted (Abernyte and Kilspindie) and some that have never had settlement boundaries (e.g. Pitroddie, Glendoick, Craigdallie, Ballindean). We understood and accepted the reasoning behind the principle of not identifying settlement boundaries for the smallest settlements but were concerned that unless the terms of the Housing in the Countryside Policy were consistently and rigorously applied there would be a risk of ongoing creeping expansion of rural "small settlements", ribbon development outwith any existing "natural" settlement boundary and further suburbanisation of the countryside. With the designation of an area around Perth as "Green Belt" we are concerned that there may in the future be more pressure put on planners to grant permission for housing in the Braes of the Carse being a rural area outwith the green belt. It is therefore of importance that the Housing in the Countryside Guide is robust and sufficient to prevent inappropriate development of rural non-Green belt land.

We consider that the Housing in the Countryside Guide Nov 2012 is an improvement on the previous 2009 guidance which itself had tightened up the previous 2005 Policy that, with the benefit of hindsight, had allowed inappropriate development to spoil areas of our rural landscape. However there are two issues, both raised previously, that we would ask you to reconsider in the current Guide.

1. The wording of the category "Building Groups". We are concerned at the fairly widespread practice of artificially creating a potential "site" in an otherwise open field or other land. We consider that it should be made absolutely clear in the Housing in the Countryside Guide that an attempt to artificially create a landscape framework by the subdivision of a field or other land whether by the erection of a fence or the planting of trees or hedging will **not** be sufficient to secure the grant of planning. This is already stated in the current "Siting Criteria" for "New Houses in the Countryside" but not for

Building Groups. We also would like to see the word "will" replaced with "may", the words "definable sites" replaced with "an obvious nucleated shape" or similar wording as we feel it could be argued that any site could be "definable", and the word "well" replaced by "long" all in the second sentence. Our understanding is that it is not considered to be good planning practice to allow landscape frameworks to be artificially created or contrived and we consider that the suggested changes would provide an important and useful tightening of the Guide. Settlements that have boundaries are now protected in that planning will not be granted for development adjacent to the settlement boundary so it is vitally important for those small settlements without boundaries that ribbon development is not permitted. Our suggested wording for the category "Building Groups" would therefore be:

"Consent will be granted for houses **within** building groups provided they do not detract from both the residential and visual amenity of the group. Consent may also be granted for houses which **extend** the group, but only into an obvious nucleated shape, formed by the existing topography and/or long established landscape features which will provide a suitable setting. For the avoidance of doubt, the sub-division of a field or other land artificially, for example by post and wire fence or planted hedge or tree belt in order to create the site, will not be acceptable. All proposals must respect the character, layout and building pattern of the group and demonstrate that a high standard of residential amenity can be achieved for the existing and proposed house(s) and must not have a detrimental impact on the surrounding landscape. Note: An existing building group is defined as 3 or more buildings of a size at least equivalent to a traditional cottage, whether they are of a residential and/or business/agriculture nature. Small ancillary premises such as domestic garages and outbuildings will not be classed as building for the purposes of this policy. Proposals which contribute to ribbon development will not be supported."

2. We continue to be concerned by the interpretation of when a building is "redundant" for agricultural purposes. The push by developers to purchase farm sheds for development is putting pressure on the future sustainability of agriculture in Perthshire as farming businesses cannot compete with the monetary value offered by developers for the opportunity of replacing a perfectly serviceable agricultural shed with numerous houses. The potential for this pressure could be excluded if the purchase of actively used farm buildings with a view to leaving them unused and thus "redundant" no longer qualified the building as "redundant" i.e. "constructive redundancy" would not be permitted. More requires to be done to ensure that farm buildings can be retained for agricultural use or utilised for other employment uses as opposed to housing. It is arguable that the current policy already covers this situation although one of the definitions of redundancy, that the building is "unsuited to the restructuring needs of the farm necessary to ensure a viable farm business" arguably allows too much leeway and has allowed serviceable farm buildings to be converted into residential units when they could still have been used for agriculture.

We are concerned about the proliferation of planning applications for wind turbines. Specifically we have grave concerns about the application for a windfarm at Bandirran. It would have a significant adverse impact on the character of the landscape. The area is rugged and unspoilt and these man made structures would jar with their surroundings. The turbines would be visible from miles around and affect the enjoyment of the landscape, and in particular historic Dunsinane Hill, from the point of view of residents, commuters and tourists alike. We would wish to see a further tightening of the policy for windfarms and in particular a presumption against the granting of permission for wind turbines in any area designated by PKC as a Special Landscape Area.

RESPONSE TO ANTICIPATED SUBMISSION OF SITES FOLLOWING YOUR CALL FOR SITES

We understand that in the present Call for Sites for the LDP(2) covering the period 2018-2028 you are most interested in receiving information on potential sites in the Highland, Strathmore and Strathearn areas. You already have sufficient housing land allocated in the current LDP in the Perth Housing Market Area including the Carse of Gowrie corridor. Furthermore, of course, TAYplan's spatial strategy also dictates that no further development should be considered in the Carse with new housing concentrated in the principal settlements. However, as we suspect that the landowners who submitted sites for consideration for LDP(1) will do so again, we have annexed to this letter an extract from our previous comments made to you on 10th February 2011 to the MIR issued as part of the LDP(1) process as the points raised are mostly still pertinent. We would ask you to take into account our comments when considering any resubmission of all or any of these areas at Westown, Ballindean, Rait, Flawcraig and Abernyte. We will expand on and update our comments in due course during the MIR consultation period if all or any of the sites are indeed resubmitted.

Yours faithfully

Malcolm McSwan Chair BCCG

Part of BCCG submission dated 10/02/11 to MIR:

A. Ballindean (Sites 132 and 133)

Ballindean is not presently designated as a settlement although a boundary was put forward in the draft 2004 Plan. The preferred LDP strategy does not seek to identify new small settlements (Ballindean would be classed a small settlement as it has less than 20 dwellings and no community services whatsoever) or provide them with boundaries and we are happy to rely on this if the Housing in the Countryside Policy 2009 is rigorously enforced.

However, in our view **if** it is considered that a settlement boundary is required for the hamlet it should be tightly drawn as shown in Attachment 2. Both submissions 132 and 133 would allow potential development on a scale inappropriate to the setting of the existing settlement. There are only 17 houses in the hamlet. Planning permission has within the last year been granted for a further 2 houses i.e. an increase of more than 10%. It should be noted that BCCG and neighbouring proprietors did **not** object to the planning application as it was considered appropriate infill within the logical boundary of the hamlet and would thus allow modest expansion of the hamlet appropriate in both scale and pace. There would be further limited scope for development within our preferred boundary and we consider that no development over and above this would be appropriate during the term of the LDP otherwise the hamlet could be swamped and its sense of community lost.

We would also ask that consideration be given to designating Ballindean with Conservation status. Some of the reasons for so doing are given below and the community would value the opportunity of exploring this further with PKC.

Assessment topic

Biodiversity

Sustainable locations – Proximity to Services and Facilities

We disagree with the assessment and suspect that perhaps the wrong information has been detailed for the site. It is indeed within walking distance of the village but the village has **NO** services of any description. The bus service is very infrequent –just twice a week- (as acknowledged in the assessments of the submissions for Rait and Abernyte) and there is no bus stop in the village. There is no realistic potential for sustainable transport links to services or other settlements (as acknowledged in the Rait and Abernyte assessments indicating they are not sustainable locations.)

Part of the eastern section of site 132 would affect a marshy wetland area where Lapwing, Skylark and many other birds breed. Lapwing and Skylark are both BAP Priority Species and therefore should be protected from the impacts of development. They require large areas of open habitat and also wetland areas for feeding. Any development within approximately 100m would cause these priority species to abandon this site, and as there are very few sites on the Carse where permanent wetlands occur, this would be likely to prevent them from establishing successful territiories elsewhere. There is also a barn owl that regularly hunts on the fields forming the east end of site 132 so that any development in this area would put this rare species at risk.

The site also wraps around the Wester Ballindean Orchard that has been recognised as a Historic Orchard being an ancient orchard worthy of preservation because of its biodiversity.

Landscape

If a Green Belt designation does not extend eastwards to include inter alia Ballindean we would hope that the value of the Braes of the Carse landscape would be considered worthy of protection in terms of paras 4.4.1.-4.4.14 of the MIR. Even if neither of these proposals find favour we suggest that that any development in either of sites 132 and 133 would still be inappropriate given the landscape setting of the village as we do not consider that development would be possible without adversely affecting the key characteristics of the Landscape Character type. As suggested by Scottish Natural Heritage (SNH) in their Tayside Landscape Character Assessment

such development would have a "suburbanising influence on the Sidlaw's landscape" and in our view also should not be allowed.

Cultural Heritage

The importance of the Wester Ballindean Orchard has already been mentioned in relation to site 132.

Any development of either site would have a material adverse impact on the setting of Easter Ballindean House and Easter Ballindean Lodge listed C(S) and B respectively. These distinctive red sandstone Georgian buildings feature prominently and form the eastern end of the village with open farmland to the north and south enhancing their setting. Even taking into account the topography of the sloping site the setting of these listed buildings would be materially prejudiced by development of either site. The majority of the other houses in the village, several of which are also listed, are also built of the local red sandstone and form an attractive small settlement or, as stated in "The Illustrated Architectural Guide to Perth & Kinross" (a publication supported by PKC, PKHT and Perth Civic Trust and others) "a picturesque estate hamlet". It has evolved a characteristic form of development that cannot be replicated on a large scale and deserves to be conserved for existing and future generations of residents and visitors.

Site Description

We agree with the assessment that both sites would have significant adverse affects on the village setting with views into and out of the village being materially affected. Development of either site would be visible from the A90. The size of the sites would have an adverse impact on the character of the village.

Access

The proposed re-routing of the road in connection with site 132 would be of no local benefit and would be contrary to SNH's recommendation (Tayside Landscape Character Assessment clause 5.8.9) that "improvements" to rural roads in the Braes of the Carse should be resisted. The distinctive sharp bend within the village has been in place for many generations. The oldest resident in Ballindean, who has lived locally for more than 60 years, confirms that to her knowledge there have never been any serious accidents at the bend. Indeed the bend in the road has the advantage of slowing down traffic as it passes through the village.

Air Quality

Again, we would wish to correct the comment in the initial assessment. The sites are **NOT** proximate to public transport (in the same way as the Rait and Abernyte sites) **Soil**

Where possible we consider that PKC should protect agricultural land.

Water and Flooding

It is stated that there is no known flooding in the area. This is patently incorrect. The Roads Department from their records will be able to verify that the public road leading to and through the village, as in many other places in the Carse, frequently floods after periods of heavy rain. (See Attachments 3 and 4) The water run off from the Braes immediately to the North of the village is significant and, from local knowledge, has worsened over recent years and, with climate change, is likely to become even more significant. After heavy rain or snow melt water pours off the hill along the route shown forming the east boundary of site 133. (See Attachment 5). It continues down the driveway of Easter Ballindean House and directly into the field forming part of the eastern end of site 132. (See Attachment 6) As previously mentioned part of the site and the adjoining land to the east is well established marshland and has been uncultivated for many years despite recent attempts to

improve drainage. The water runs into this field (north of the Higher Carse road) and it is often under water for lengthy periods (See attachment 7) as is site 132 south of the Higher Carse road – a haven for birdlife but not suitable for housing. (See Attachment 8).

At Wester Ballindean water again cascades off the hill and frequently floods the site 132 to the south of the existing village. More photos can be made available if required.

With the break up of farms and reduced labour forces there is less regular clearing of silt traps and so with increased water run off as a result of climate change the culverts that already block and overflow will do so even more frequently.

There is no public drainage system in Ballindean. Any new houses would require private drainage arrangements which, from local knowledge, are sometimes problematic given the soil type in the Carse and the inability of the existing field drains and Pows to cope with the existing, let alone increased future, water run off.

B Rait (Site 720)

Green Infrastructure

Over the past the 3 years there have been 3 new houses built with a further 2 in progress leaving very little open space in the village.

Biodiversity

The village plays host to a number of protected species such as bats, red squirrels and owls and the site is a valuable wildlife corridor.

Landscape

Any development sensitive or not would have a major impact on the village landscape both looking into and out of the village.

Cultural Heritage

Not only does the village contain the archaeological sites and listed buildings referred to in the assessment it also has a C listed churchyard. It is a Conservation area and would be materially affected by any development of the site.

Site Description

The view from the top of the hills to the west and up from the east would undoubtedly be affected.

Site Orientation

The site is now extremely limited since the latest permission was granted.

Access

Most of the local road network is single track with limited passing places, which are particularly difficult during bad weather.

Soil

Due to the lack of mains sewerage and occasional flooding old septic tanks can pose contamination issues.

Water

Tailraces from septic tanks are discharged into Rait burn.

Flooding

The burn within the village regularly floods. (Photos can be provided by our local members.)

As a final point we would wish to comment that although Rait's importance to the area has been acknowledged by it being designated a Conservation Area, as far as we

are aware, it has not had any appraisal carried out on it since its initial designation. We understand that there is extensive guidance given to Councils on the proper treatment of Conservation Areas and we would suggest that a reassessment of Rait is now long overdue.

C Abernyte (Sites 29,30 and 31)

Site 29

Biodiversity

Red squirrels and barn owls have been sighted at the north end of the Site.

Landscape

Development of the site would alter the character of the village and create a more linear settlement.

Site description

The size of the site would be out of all proportion to the existing village

Soil

The site is good agricultural land

Water

A burn flows under the site via an underground channel and has been recorded as overflowing during periods of heavy run off. Access to and future enhancements of the burn could be an issue if the site was developed and it would cause difficulties building on unstable land. Under the Water Framework Directive, there is a requirement that all watercourses are protected from degredation, and, where possible, degraded watercourses are improved. Building over a culverted watercourse would make such improvements very difficult and cause the burn to be nothing more than a drain, with no habitat or ecological potential for many years into the future. It is also understood that den through which the burn flows was filled in with "unknown materials" which could cause problems for future "daylighting" in the burn.

There is no mains sewage system currently in the village.

Flooding

The underground channel has been choked in the past and has overflowed in the area of the proposed site.

There is no initial assessment of Sites 30 and 31 but we would make the following comments.

Site 30

This area has been used for many years by the Abernyte community and by the School as amenity ground and a playing field. The Abernyte Community has a Scottish Government approved "Register of Interest" in the field with the intention of retaining its use for the community as a park and playing field.

Site 31

We agree that this appears contrary to the Housing in the Countryside policy.

D Westown (Sites 805 and 806)

There is no initial assessment of these large sites and so we feel unable at this stage to make specific comments. We would, however, wish to register our extreme concern about any large scale development on these sites. We note that development of this area of agricultural land is considered contrary to the preferred spatial strategy and are reassured by this.

We are strongly of the opinion that the mooted large scale development on the land that includes proposals for a mart, car auction site, hotel and housing is totally inappropriate for the site.

E Flawcraig (Sites 426 and 427)

Again, no assessments carried out of these sites and therefore no comments to make other than supporting the view stated that development of neither site complies with the Housing in the Countryside policy.



Perth and Kinross Local Development Plan

Call for Issues

20 January - 31 March 2015

This form should be used to make a submission to the call for issues process to raise awareness of an issue for consideration in the review of the Perth and Kinross Local Development Plan. Requested information should be concise and to the point.

For help completing this form you are advised to read the associated **Guidance notes** or ring us on 01738 475300

PART 1 APPLICANT AND SITE DETAILS

1. Agents Details (if any)		2. Your details	
Name		Name	Peter Symon
Company		Company	
Building No./Name		Building No./Name	
Address		Address	
Town/City		Town/ City	
Postcode		Postcode	
Telephone		Telephone	
Mobile		Mobile	
Email		Email	
3. Who is the main contact f	for this submission?		
☐ Agent ✓ You			

PART 2 IDENTIFYING ISSUES

CLIMATE CHANGE

4. 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.

some years.
Do the Environmental Protection and Public Safety policies <u>EP1</u> & <u>EP2</u> (and associated <u>Supplementary Guidance</u>) of the existing Local Development Plan (LDP) adequately address this issue?
Yes
▼ No
Don't know
If no, tell us what change you would like to see, and why?
(a) Supplementary Guidance is required on Environmental Impact Assessment in particular due to the forthcoming changes to EIA resulting from the new European Directive.
(b) Insufficient attention may have been given to designing buildings, places and transport infrastructure that provide suitable protection against high winds.
HEALTHIER LIVES 5. 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?
▼ Yes
□ No
Don't know
If yes, please tell us what change you would like to see and why?

- (a) The Scottish Government policy statement (2013) on architecture and place, 'Creating Places', articulates an agenda for place making policies aimed, inter alia, at reducing health inequalities and improving children's health. You will need to strip out the rhetoric and amend relevant policies, especially PM2, to incorporate the agenda into the local development plan. Consider how the plan can apply design guidance to windfall housing sites not normally required to submit Design Statements.
- (b) Green Infrastructure Supplementary Guidance (November 2014) provides a welcome addition to Policy NE4. To incorporate specific provisions with regard to health and well-being, the Guidance must be extended to geographical areas not presently covered; and, within the opportunity areas identified in the present Guidance, focused-down in order to increase the level of locally-specific detail, both in the form of strategic aims and also in the form of mandatory criteria that must be met in order for development consents to be granted. As stated in my submission on the Supplementary Guidance, there is still much work to be done to improve and extend the green network along the agriculturally intensive landscape of the Carse of Gowrie and to include opportunities arising from transport, electricity and pipeline infrastructure developments as well as from housing and mixed use developments. The focus of the Inner Tay Masterplan 2012-2022, while also very welcome, is towards the environs of Perth, and the development plan should extend the focus to the rest of the tidal reaches of the Tay that fall within the plan area.
- (c) Reduce the 'wriggle room' in policies PM1A, PM1B, PM1C. Those are the 'bread and butter' policies, for development management purposes. Place making policies are frequently relied upon by the Council in deciding whether to approve or refuse applications. Probably to a greater extent than any other development plan policies, it is those policies that provide the grounds for refusing or approving planning applications for reasons of residential amenity, visual amenity or landscape amenity, which are often decisive and which are often included as conditions on planning consents. Councils as planning authorities already have an established and wide discretion provided to them

by the Scottish Ministers. Discretion is constantly cited as a ground for deciding reviews, appeals and other challenges to refused applications. Armed with such a high level of discretion there is no need for vague language to be used to express the place making policies of the Council in the development plan. A simple and elegant way of avoiding uncertainty would be to go through the existing suite of place making policies, notably PM1A, PM1B and PM1C, and replace every mention of the terms 'should' or 'will normally need to' or 'should seek to' with the word 'must'. In so doing, the Council would have done more, at a stroke, to establish mandatory standards to be met by all development than by any other amendment it may otherwise make to the present development plan. If such a reduction in 'flexibility' is deemed politically or economically unacceptable to important developer, landowner, agricultural or public interests, the Council must at least specify in greater detail the conditions under which given criteria are not mandatory but may be breached in given circumstances.

BUSINESS, TOURISMAND LESIURE 6. Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and businesses?
Yes
▼ No
Don't know
If no, please tell us what you consider should change and why?
TAYplan and local development plan policy is to steer employment land supply in the Perth Area to Perth itself. There is a case to be made, in order to provide local employment closer to homes, encourage cycling and walking to work, and reduce commuting by car, for designation of small local industrial and business estates in landward areas, on a settlement-by-settlement basis, commensurate with the size of their local populations. Recent drastic reduction in the numbers of working tenant farms provides an obvious starting point for the formulation of a rural brownfield employment land policy. At present the approach seems to be led by the supply-side.
7. Do the existing LDP policies (ED1-5) adequately encourage new employment sites and businesses?
Yes
▼ No
Don't know
If no, please tall us what you consider should change and why?

If no, please tell us what you consider should change and why?

- (a) ED3 refers to adequate local road network (criterion (e)) but this is in reality a major constraint on rural economic development. Greater specification of road network capacity and how it is to be met is required in order to steer development to locations with suitable roads infrastructure and/or identify areas of the roads network that requires upgrading of capacity and improvement of multimodal transport infrastructure.
- (b) A policy on Economic Development at Strategic Transport Infrastructure Sites is required, in order to provide a response to evident development pressure along transport infrastructure corridors and at interchanges and points of multimodal links. Such pressures are evident along the Perth West corridor and also along the route of the A90(T) between Perth and Dundee, identified in TAYplan as the Area of Greatest Change. Consideration should be given to specific development issues including spatial boundaries around mixed use sites located at interchanges and a guide given to specifying a hierarchy for release of land at the different sites.

CITY AND TOWN CENTRES 8. 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?
Yes
□ No
☐ Don't know
If no please tell us for which town(s) and why you consider this to be the case.
The hierarchy set out in RC4 is welcomed and should be retained.
RESIDENTIAL DEVELOPMENT 9. Do policies RD1-6 provide a satisfactory framework for consideration of residential development within Perth &
Kinross?
Yes
☑ No
☐ Don't know

Please give your reason(s) for your answer.

- (a) Supplementary Guidance (Housing in the Countryside) for RD3 should be revised in order to bring it up to date with Scottish Planning Policy and PAN 72 as the older guidance on siting, design and layout of rural housing has become out of date. There also needs to be a policy statement on steading conversions and redevelopment of farm buildings for housing as it is not clear what is presently encouraged or discouraged.
- (b) RD3 should also be revised to include reference to all relevant national and international sites in the plan area and not just those listed in the current policy statement. For example, some important Inner Tay Estuary designations are not presently mentioned (including Ramsar site) although they may be affected by development including Oudenarde and James Hutton Institute and in general within the area identified in TAYplan as Area of Greatest Change.
- (c) The Housing Demand and Need Analysis exercises that have been carried out have deemed the boundary of the Perth & Kinross part of the Dundee HMA (Housing Market Area) and Perth HMA to divide the Errol community council area more or less in two parts. The allocation of housing land within the PKC part of the Dundee HMA is very constrained whereas the Perth HMA part is more generously provided. In general the local development plan contains too little detail on such local housing issues, and it is hoped that the LDP2 will move to provide a better spatial framework for analysis. Urgently required is a settlement map showing settlement boundaries, and allocated housing sites, for the whole of the plan area, and also settlement maps for each HMA.
- (d) Clarification is required of Policy towards the Carse of Gowrie and in particular to the designations of sub-areas of the Carse of Gowrie as being suitable for allocation of development land releases. How do you justify regarding the Carse of Gowrie as only limited development (5.1.2)? TAYplan designates the entire Carse of Gowrie as an Area of Greatest Change. Sub-areas are subject to considerable differences in development land allocations: the Perth Green Belt; Invergowrie SDA; areas around Perth Core Area (landward); areas around Dundee; rest of Carse. A more nuanced approach to sub-area designations of development land release is required.
- (e) A technical problem to be addressed is that GROS spatial data units are not compatible with geographies of settlements or of HMAs. For example although Inchture village is a compact GROS spatial data unit, Errol village is subdivided into several GROS data units that each include relatively large landward areas.

LOW CARBON TRAVEL, HEAT AND POWER 10. 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 policy ER1, Transport policy TA1 and Climate Change, Carbon Reduction and Sustainable Construction policy EP1 of the existing LDP need updating to enable Perth & Kinross Council to fulfill its obligations in this respect?
Yes
✓ No
Don't know
If yes, please tell us what changes you consider would be appropriate and why?
(a) More attention should be given to expanding the number of railway stations and of car parking and park-and-ride facilities at existing railway stations in order to provide greater choice of travel by rail.
(b) More cycling and walking routes and paths are needed throughout the plan area.
(c) Greater guidance is required on the level of detail and quality of analysis required in transport statements provided as part of planning applications.
RESOURCE SECURITY 11. Existing policy <u>ER3</u> 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?
12. Are other Natural Resources adequately protected by the LDP Policies (<u>ER3</u>)?
Yes
✓ No
☐ Don't know
If no, explain what aspects of the policy you consider should be altered and why?
Salmon fishing in tidal waters is not addressed in the LDP policies.

GREEN/BLUE NETWORKS

Green/Blue spaces and networks include any area of open space whether public or private; gardens, parks, woodlands and hedgerows. These are all important. It also includes water systems such as rivers, lakes and ponds, and the coastline. Networks refer to the interlinking of these spaces and features all of which have a host of benefits, for both people and biodiversity, e.g. Being utilised for travel to work (such as a footpath network), for leisure (e.g. parkland, woodland, sea-shore) or perhaps providing a habitat for important species.

13. Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately protect and promote green and blue networks?
Yes
✓ No
☐ Don't know
If you answered no, please help us by explaining how they should be changed, and your reason(s).
The LDP should have a specific Inner Tay Estuary Environment Policy. It may be appropriate to formulate Supplementary Guidance on such a Policy.
OTHER ISSUES 14. Have we missed any land use planning issue which you consider the revised LDP2 should cover?
✓ Yes
□ No
☐ Don't know

If yes, please detail below, and give reasons for your suggestion(s).

- (a) Policy ED4, or a new policy, should set out a specific policy toward camping pods and other innovative forms of camping and caravaning accommodation typically used for purposes of providing 'glamping' sites, but which may technically be regarded in planning law as caravans. It is understood that other Councils in Scotland have developed policies specifically toward 'camping pods' and other new forms of temporary leisure accommodation.
- (b) NPF3 states as a national development the upgrading of the high voltage electricity transmission network including replacement of lines, pylons, substations and accompanying infrastructure. Mitigation corridors, stand-offs and implications for local development should be addressed in the local development plan.
- (c) A policy on development of large-scale solar photovoltaic installations ('solar farms') is required.
- (d) To the extent that the Call for Sites Consultation is driven by the supply-side, in accordance with Scottish Government policy, the Call or Sites Consultation is not designed in such a way as to facilitate an expression of views by residents, communities or organisations, other than landowners or developers, on strategic sites where there is perceived to be an development opportunity for community and social facilities, or conversely where there is a perceived need to protect a site from development so as to reserve it for community, health or social purposes. Therefore I wish to take the present opportunity to identify the area of undeveloped land in Errol village bounded to the west and north by Preston Watson Street, to the south east by the approved extension of Errol Primary School, and to the south west by Errol Public Park, considering it to be a strategic site that must be reserved for community, health or social facilities much needed in the village.
- (e) A policy statement on the development implications of upgrades to the rail network arising from track electrification and of closure of level crossings, is required.
- (f) A policy or suite of policies on the development implications of the new bridge over the Tay is required.
- (g) ER5 should be elaborated so as to 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

SUPPLEMENTARY GUIDANCE
15. Does the existing LDP have the right balance between Policies and Supplementary Guidance (SG), and does
the SG cover the right topic areas?
the GC cover the right topic areas:
□ Va
Yes
T No
✓ No
□ Panklinau
☐ Don't know

If no, please detail how you think the balance should change &/or which topic areas should be included/excluded, together with your reason(s).

- (a) Supplementary Guidance is urgently needed on Historic Environment Policy, to include city centre buildings, listed buildings, policy toward review of Conservation Areas, protection and preservation of vernacular farm buildings and rural architecture, Historic Scotland Conservation Area Regeneration Grant. Designation of conservation areas has been rapid and widespread and needs to be consolidated. Conservation has been weakened as a result of cuts in local authority budgets and should be strengthened including within the local development plan.
- (b) Supplementary Guidance on Transport Infrastructure Development Contributions should be revised so as to be based geographically upon Travel to Work Area and Retail Catchment Area geographies and not based, as at present, on Housing Market Areas. Households make only one housing move every seven years or so. That is not likely to generate much traffic on the new bridge over the Tay. In comparison people generally tend to travel more than once a day to get to and from work and/or to go shopping in Perth. That is guite likely to generate a fair amount of traffic over the new bridge over the Tay. Quite a lot of those commuting to work in Perth will be coming from Coupar Angus or Blairgowrie where no contributions are required from developers towards meeting the cost of the new bridge. The present policy is nothing less than a crude and blatant attempt to steer speculation in land to those areas of Strathmore that lie just outside the area subject to taxation of development sites to fund the new bridge.
- (c) Guidance on the settlement hierarchy within the local plan area is required, in particular to clarify the rationale for, and specify the planning approaches to, development in what have been deemed to be "Tier 1 settlements": Almondbank, Scone, Bridge of Earn, Oudenarde, Methven, Stanley, Luncarty, Balbeggie and Perth Airport. All are either surrounded by or outwith the Perth Green Belt. There are difficulties with the present classification. For example, to classify Balbeggie as a Tier 1 settlement seems rather preposterous, given the limited amount of land allocated for development there in the present local development plan, suggesting that it should never have been included as such a settlement at least until transport infrastructure developments, in particular the new Tay bridge and link road, were in place. A general revision of Tier 1 settlements is very much overdue and should be based on a clear statement of the spatial strategy for the local plan area.

PART 3 DECLARATIONS

	details of these issues may be publicised as part of consultation on this and future phases Local Development Plan.	
Signature		
Development Plan. I her	nis is a submission for the Call for Issues process as part of Perth and Kinross Local reby confirm that the information given in this form is true and accurate to the best of my c submissions, please confirm your statement by ticking the box instead of providing	
Signature:		
Name:	Peter Symon	
Date:	March 2015	
Any personal data that you have been asked to provide on this form will be held and processed in accordance with the requirements of the 1998 Data Protection Act. 36. How did you find out about the call for sites process? optional question. Councils website Notice in Newspaper, could you tell us which one below? PKC Development Plan Scheme Telephone enquiry to Council Email enquiry to Council Social Media (e.g. Twitter, Facebook) Other, could you tell us how below? Further information		
Completed Submissio	n forms and location plans should be addressed to	

Completed Submission forms and location plans should be addressed to developmentplan@pkc.gov.uk

Or alternatively by post to:

Local Development Plan Team Perth and Kinross Council Pullar House 35 Kinnoull Street Perth PH1 5GD

The Call for Issues process will run from Tuesday 20 January 2015 for 10 weeks. Completed Submissions must be received by Tuesday 31 March 2015.

Peter Symon: Call for Issues, LDP 2: Questions with Open-Ended Fields where Print-Off of PDF Cuts Off the Response: Responses in Full below: Supplement to Form Already Returned 30.03.2015.

Q.5

- (a) The Scottish Government policy statement (2013) on architecture and place, 'Creating Places', articulates an agenda for place making policies aimed, inter alia, at reducing health inequalities and improving children's health. You will need to strip out the rhetoric and amend relevant policies, especially PM2, to incorporate the agenda into the local development plan. Consider how the plan can apply design guidance to windfall housing sites not normally required to submit Design Statements.
- (b) Green Infrastructure Supplementary Guidance (November 2014) provides a welcome addition to Policy NE4. To incorporate specific provisions with regard to health and well-being, the Guidance must be extended to geographical areas not presently covered; and, within the opportunity areas identified in the present Guidance, focused-down in order to increase the level of locally-specific detail, both in the form of strategic aims and also in the form of mandatory criteria that must be met in order for development consents to be granted. As stated in my submission on the Supplementary Guidance, there is still much work to be done to improve and extend the green network along the agriculturally intensive landscape of the Carse of Gowrie and to include opportunities arising from transport, electricity and pipeline infrastructure developments as well as from housing and mixed use developments. The focus of the Inner Tay Masterplan 2012-2022, while also very welcome, is towards the environs of Perth, and the development plan should extend the focus to the rest of the tidal reaches of the Tay that fall within the plan area.

Q.7

- a) ED3 refers to adequate local road network (criterion (e)) but this is in reality a major constraint on rural economic development. Greater specification of road network capacity and how it is to be met is required in order to steer development to locations with suitable roads infrastructure and/or identify areas of the roads network that requires upgrading of capacity and improvement of multimodal transport infrastructure.
- (b) A policy on Economic Development at Strategic Transport Infrastructure Sites is required, in order to provide a response to evident development pressure along transport infrastructure corridors and at interchanges and points of multimodal links. Such pressures are evident along the Perth West corridor and also along the route of the A90(T) between Perth and Dundee, identified in TAYplan as the Area of Greatest Change. Consideration should be given to specific development issues including spatial boundaries around mixed use sites located at interchanges and a guide given to specifying a hierarchy for release of land at the different sites.

- (a) Supplementary Guidance (Housing in the Countryside) for RD3 should be revised in order to bring it up to date with Scottish Planning Policy and PAN 72 as the older guidance on siting, design and layout of rural housing has become out of date. There also needs to be a policy statement on steading conversions and redevelopment of farm buildings for housing as it is not clear what is presently encouraged or discouraged.
- (b) RD3 should also be revised to include reference to all relevant national and international sites in the plan area and not just those listed in the current policy statement. For example, some important Inner Tay Estuary designations are not presently mentioned (including Ramsar site) although they may be affected by development including Oudenarde and James Hutton Institute and in general within the area identified in TAYplan as Area of Greatest Change.
- (c) The Housing Demand and Need Analysis exercises that have been carried out have deemed the boundary of the Perth & Kinross part of the Dundee HMA (Housing Market Area) and Perth HMA to divide the Errol community council area more or less in two parts. The allocation of housing land within the PKC part of the Dundee HMA is very constrained whereas the Perth HMA part is more generously provided. In general the local development plan contains too little detail on such local housing issues, and it is hoped that the LDP2 will move to provide a better spatial framework for analysis. Urgently required is a settlement map showing settlement boundaries, and allocated housing sites, for the whole of the plan area, and also settlement maps for each HMA.
- (d) Clarification is required of Policy towards the Carse of Gowrie and in particular to the designations of sub-areas of the Carse of Gowrie as being suitable for allocation of development land releases. How do you justify regarding the Carse of Gowrie as only limited development (5.1.2)? TAYplan designates the entire Carse of Gowrie as an Area of Greatest Change. Sub-areas are subject to considerable differences in development land allocations: the Perth Green Belt; Invergowrie SDA; areas around Perth Core Area (landward); areas around Dundee; rest of Carse. A more nuanced approach to sub-area designations of development land release is required.
- (e) A technical problem to be addressed is that GROS spatial data units are not compatible with geographies of settlements or of HMAs. For example although Inchture village is a compact GROS spatial data unit, Errol village is subdivided into several GROS data units that each include relatively large landward areas.

Q.14

a) Policy ED4, or a new policy, should set out a specific policy toward camping pods and other innovative forms of camping and caravaning accommodation typically used for purposes of providing 'glamping' sites, but which may technically be regarded in planning law as caravans. It is

understood that other Councils in Scotland have developed policies specifically toward 'camping pods' and other new forms of temporary leisure accommodation.

- (b) NPF3 states as a national development the upgrading of the high voltage electricity transmission network including replacement of lines, pylons, substations and accompanying infrastructure. Mitigation corridors, stand-offs and implications for local development should be addressed in the local development plan.
- (c) A policy on development of large-scale solar photovoltaic installations ('solar farms') is required.
- (d) To the extent that the Call for Sites Consultation is driven by the supply-side, in accordance with Scottish Government policy, the Call or Sites Consultation is not designed in such a way as to facilitate an expression of views by residents, communities or organisations, other than landowners or developers, on strategic sites where there is perceived to be an development opportunity for community and social facilities, or conversely where there is a perceived need to protect a site from development so as to reserve it for community, health or social purposes. Therefore I wish to take the present opportunity to identify the area of undeveloped land in Errol village bounded to the west and north by Preston Watson Street, to the south east by the approved extension of Errol Primary School, and to the south west by Errol Public Park, considering it to be a strategic site that must be reserved for community, health or social facilities much needed in the village.
- (e) A policy statement on the development implications of upgrades to the rail network arising from track electrification and of closure of level crossings, is required.
- (f) A policy or suite of policies on the development implications of the new bridge over the Tay is required.
- (g) ER5 should be elaborated so as to 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.

Q.15

(a) Supplementary Guidance is urgently needed on Historic Environment Policy, to include city centre buildings, listed buildings, policy toward review of Conservation Areas, protection and preservation of vernacular farm buildings and rural architecture, Historic Scotland Conservation Area Regeneration Grant. Designation of conservation areas has been rapid and widespread and needs to

be consolidated. Conservation has been weakened as a result of cuts in local authority budgets and should be strengthened including within the local development plan.

- (b) Supplementary Guidance on Transport Infrastructure Development Contributions should be revised so as to be based geographically upon Travel to Work Area and Retail Catchment Area geographies and not based, as at present, on Housing Market Areas. Households make only one housing move every seven years or so. That is not likely to generate much traffic on the new bridge over the Tay. In comparison people generally tend to travel more than once a day to get to and from work and/or to go shopping in Perth. That is quite likely to generate a fair amount of traffic over the new bridge over the Tay. Quite a lot of those commuting to work in Perth will be coming from Coupar Angus or Blairgowrie where no contributions are required from developers towards meeting the cost of the new bridge. The present policy is nothing less than a crude and blatant attempt to steer speculation in land to those areas of Strathmore that lie just outside the area subject to taxation of development sites to fund the new bridge.
- (c) Guidance on the settlement hierarchy within the local plan area is required, in particular to clarify the rationale for, and specify the planning approaches to, development in what have been deemed to be "Tier 1 settlements": Almondbank, Scone, Bridge of Earn, Oudenarde, Methven, Stanley, Luncarty, Balbeggie and Perth Airport. All are either surrounded by or outwith the Perth Green Belt. There are difficulties with the present classification. For example, to classify Balbeggie as a Tier 1 settlement seems rather preposterous, given the limited amount of land allocated for development there in the present local development plan, suggesting that it should never have been included as such a settlement at least until transport infrastructure developments, in particular the new Tay bridge and link road, were in place. A general revision of Tier 1 settlements is very much overdue and should be based on a clear statement of the spatial strategy for the local plan area.



Perth and Kinross Local Development Plan

Call for Issues

20 January - 31 March 2015

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For help completing this form you are advised to read the associated **Guidance notes** or ring us on 01738 475300

PART 1 APPLICANT AND SITE DETAILS

1. Agents Details (if any)		2. Your details	
Name		Name	MR E J BAXTER
Company		Company	n/a
Building No./Name		Building No./Name	
Address		Address	
Town/City		Town/ City	
Postcode		Postcode	
Telephone		Telephone	
Mobile		Mobile	
Email		Email	
3. Who is the main contact Agent You	for this submission?		

PART 2 IDENTIFYING ISSUES

CLIMATE CHANGE

4. 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 <u>EP1</u> & <u>EP2</u> (and associated <u>Supplementary Guidance</u>) of the existing Local Development Plan (LDP) adequately address this issue?
☐ Yes
▽ No
✓ Don't know
If no, tell us what change you would like to see, and why?
EP1 and EP2 are detailed policies however I think the Building Standards Technical Handbook section 7- Sustainability maybe a little out of date for the new Local Development Plan, and would not therefore plan for more rain and greater flood risk in future years as suggested in the above statement. The 'Bronze' level of the standards need to be removed in order for all applications to demonstrate in depth the 'Silver' standards as the basic standard for all applications for 2016 and beyond. Future applications (post 2016) need to meet the 'gold' and platinum standards thus ensuring we PKC are striving for excellence on Environmental Protection and Public Safety Policies.
HEALTHIER LIVES 5. 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?
☐ Yes
☑ 163 ✓ No
Don't know
If yes, please tell us what change you would like to see and why?
Policy PM1: Placemaking Policy
PM4: settlement boundaries- rural spaces
For settlements which are defined by a settlement boundary in the Plan, development will not be permitted.
Although the Monarch Deer Farm (Naemoor Rd, Crook of Devon) has now not been designated for housing development, I see the site is no longer within the settlement boundary in the current LDP. I think Policy PM4 should be upheld by PKC in this

instance, as the last planning application for the site raised significant local opposition and was subsequently refused. A large

number of local residents and I are opposed to the site coming forward as future development site.

BUSINESS, TOURISM AND LESIURE 6. Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and businesses?
v Yes
□ No
Don't know
If no, please tell us what you consider should change and why?
The plan recognizes that whilst most sites should be within or on the edge of existing settlements some more rural locations are appropriate for tourism and rural land use based businesses which reinforces the need to include Monarch Deer Farm within the settlement boundary. As tourism in particular accounts for 13% of all employment in Perth and Kinross, general support for tourism-related developments and facilities should be given favorable consideration.
7. Do the existing LDP policies (ED1-5) adequately encourage new employment sites and businesses?
Yes
□ No
☑ Don't know
If no, please tell us what you consider should change and why?
CITY AND TOWN CENTRES 8. 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?
Yes
□ No
✓ Don't know
If no please tell us for which town(s) and why you consider this to be the case.

RESIDENTIAL DEVELOPMENT 9. Do policies RD1-6 provide a satisfactory framework for consideration of residential development within Perth & Kinross?
Yes
✓ No
Don't know
Please give your reason(s) for your answer.
I feel the LDP should state from the outset the two significant core values, namely that any development framework should 'protect & enhance the amenity of existing residents and protect prime agricultural land and our scenic landscape against inappropriate development.' Whilst your current policies (RD1-6) provide a framework for considering residential development it does not include historical settlement boundaries as with that of the Crook of Devon and Monarch Deer Farm, whilst I appreciate this site is no longer listed in the LDP for residential development consideration I do think the loss of the AGLV's designation is extremely disappointing and the village settlement boundary needs to be updated to ensure this site is not permitted for future development. Policy RD4: Affordable Housing Residential development. I feel the developer contributions should be published in detail as per policy (RD4) however the statement 'in appropriate circumstances, a commuted sum will be required from developers' will be a matter for agreement between the developer and the Council this needs to be more robust in its wording and all agreements need to be published, and consulted on with the wider community prior to agreement.
LOW CARBON TRAVEL, HEAT AND POWER 10. 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 policy ER1, Transport policy TA1 and Climate Change, Carbon Reduction and Sustainable Construction policy EP1 of the existing LDP need updating to enable Perth & Kinross Council to fulfill its obligations in this respect?
Yes
No
✓ Don't know
If yes, please tell us what changes you consider would be appropriate and why?
RESOURCE SECURITY 11. Existing policy <u>ER3</u> 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?
More information on Coal Bed Methane, Extraction and Fracking is required in the LDP2.

12. Are other Natural Resources adequately protected by the LDP Policies (ER3)?
Yes
□ No
☑ Don't know
If no, explain what aspects of the policy you consider should be altered and why?
I think this area needs to updated in the LDP2 to incorporate extra protection with regards Coal Bed Methane, Extraction and Fracking
GREEN/BLUE NETWORKS
Green/Blue spaces and networks include any area of open space whether public or private; gardens, parks, woodlands and hedgerows. These are all important. It also includes water systems such as rivers, lakes and ponds, and the coastline. Networks refer to the interlinking of these spaces and features all of which have a host of benefits, for both people and biodiversity, e.g. Being utilised for travel to work (such as a footpath network), for leisure (e.g. parkland, woodland, sea-shore) or perhaps providing a habitat for important species.
13. Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately protect and promote green and blue networks?
✓ Yes
□ No
Don't know
If you answered no, please help us by explaining how they should be changed, and your reason(s).
Yes I think so although this needs to reflect the diversity of provision within the Perth and Kinross area.
OTHER ISSUES 14. Have we missed any land use planning issue which you consider the revised LDP2 should cover?
✓ Yes
□ No
Don't know

If yes, please detail below, and give reasons for your suggestion(s).

Finally, the settlement boundaries in our current local plan at Balado Crossroads, Blairforge, Craigowmill, Cuthill Towers, Easter Balgedie, Gairney Bank, Gairneybridge/Fruix, Lochran Sidings, Mawcarse, Middleton, Netherton & Upper Tillyrie have been removed, nine of these settlements are within the Lochleven Catchment area. I understand councillors have voted against the extension of the Local Landscape Areas to include the Cleish Hills, River Devon Gorge, Lochleven, Ochil Hills and Portmoak, which is a huge disappointment, and I ask for this decision to be reconsidered under landscape and tourism as the landscape/scenery is a huge asset for this industry.

I understand settlements with less than 20 houses, except within the catchment, may lose their boundaries and feel small communities need some certainty as to the parameters of their settlements as I am concerned with the potential for unauthorised development in the countryside on the edge of settlements, unless Policy RD3 is robust and enforced.

SUPPLEMENTARY GUIDAN 15. Does the existing LDP the SG cover the right topi	have the right balance between Policies and Supplementary Guidance (SG), and does
Yes	
□ No	
Don't know	
If no, please detail how you twith your reason(s).	hink the balance should change &/or which topic areas should be included/excluded, together
	somewhat disorganized when trying to assess the policies and supplementary guidance as a sier to access all parts. Some of the supplementary guidance need to be looked at and transferr
PART 3 DECLARATIONS	
	letails of these issues may be publicised as part of consultation on this and future phases Local Development Plan.
Signature	
Development Plan. I her	nis is a submission for the Call for Issues process as part of Perth and Kinross Local eby confirm that the information given in this form is true and accurate to the best of my c submissions, please confirm your statement by ticking the box instead of providing
Signature:	
Name:	Mr Ellis Jeffery BAXTER
Date:	30th March 2015

Any personal data that you have been asked to provide on this form will be held and processed in accordance with the requirements of the 1998 Data Protection Act.

36. How did you find out about the call for sites process? optional question.		
Councils website		
Notice in Newspaper, could you tell us which one below?		
PKC Development Plan Scheme		
Telephone enquiry to Council		
Email enquiry to Council		
Social Media (e.g. Twitter, Facebook)		
Other, could you tell us how below?		
Further information neighbour		

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Perth and Kinross Local Development Plan

Call for Issues

20 January - 31 March 2015

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PART 1 APPLICANT AND SITE DETAILS

1. Agents Details (if any)		2. Your details	
Name	Donny Coutts	Name	Colin and Fiona McCarthy
Company	D G Coutts Associates	Company	
Building No./Name	48	Building No./Name	
Address	Camphill Road Broughty Ferry	Address	
Town/City	Dundee	Town/ City	
Postcode	DD5 2JE	Postcode	
Telephone	01382 779991	Telephone	
Mobile		Mobile	
Email	donny@dgcoutts.co.uk	Email	
3. Who is the main contact for this submission?			
Agent You			

PART 2 IDENTIFYING ISSUES

CLIMATE CHANGE 4. 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 <u>EP1</u> & <u>EP2</u> (and associated <u>Supplementary Guidance</u>) of the existing Local Development Plan (LDP) adequately address this issue?
✓ Yes No Don't know
If no, tell us what change you would like to see, and why?
HEALTHIER LIVES 5. 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?
☐ Yes ☐ No
✓ Don't know
If yes, please tell us what change you would like to see and why?

BUSINESS, TOURISM AND LESIURE 6. Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and businesses?
✓ Yes
□ No
☐ Don't know
If no, please tell us what you consider should change and why?
7. Do the existing LDP policies (ED1-5) adequately encourage new employment sites and businesses?
✓ Yes
□ No
☐ Don't know
If no, please tell us what you consider should change and why?
CITY AND TOWN CENTRES 8. 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?
✓ Yes
□ No
☐ Don't know
If no please tell us for which town(s) and why you consider this to be the case.

RESIDENTIAL DEVELOPMENT 9. Do policies RD1-6 provide a satisfactory framework for consideration of residential development within Perth & Kinross?
Yes
── IV No
☐ Don't know
Please give your reason(s) for your answer.
The residential policies do not provide for a full range of housing opportunities to cover the wide range of development types in the residential market. Opportunities should exist for ALL tenures and every housing development type within that market. The policies appear to provide opportunities for volume house builders, mainly in the private sector, and throughout the Strathmore towns and villages in particular, this has resulted in a preponderance of very large scale, higher density, modern private development which is alien to the historical growth patterns within these settlements. In Blairgowrie, for example, large sites are programmed for development (building on some is underway) and these developments have a tremendous and damaging effect on long vistas into and from within the town. Because of the failure to account for sites of fewer than five houses within the Housing Land Supply and Allocation figures, it means that low density, high value housing development, and/or small scale, modest lower cost urban development cannot be incorporated into programmed housing development. They rely on unprogrammed ad hoc planning applications covering brownfield sites within the towns, and very few low density, high value developments in areas like Darkfaulds and Rosemount. In those last two areas, there is scope for limited low density, high value development without threatening the area designated as Open Countryside. There are opportunities to cater for the historical type of Development in sheltered sites within structured landscapes which could be supplemented. More on the Open Space designation at Rosemount follows elsewhere in this document.
LOW CARBON TRAVEL, HEAT AND POWER 10. 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 policy ER1, Transport policy TA1 and Climate Change, Carbon Reduction and Sustainable Construction policy EP1 of the existing LDP need updating to enable Perth & Kinross Council to fulfill its obligations in this respect?
✓ Yes
□ No
☐ Don't know
If yes, please tell us what changes you consider would be appropriate and why?
RESOURCE SECURITY 11. Existing policy <u>ER3</u> 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?

12. Are other Natural Resources adequately protected by the LDP Policies (ER3)?
✓ Yes
□ No
□ Don't know
If no, explain what aspects of the policy you consider should be altered and why?
GREEN/BLUE NETWORKS
Green/Blue spaces and networks include any area of open space whether public or private; gardens, parks, woodlands and hedgerows. These are all important. It also includes water systems such as rivers, lakes and ponds, and the coastline. Networks refer to the interlinking of these spaces and features all of which have a host of benefits, for both people and biodiversity, e.g. Being utilised for travel to work (such as a footpath network), for leisure (e.g. parkland, woodland, sea-shore) or perhaps providing a habitat for important species.
13. Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately protect and promote green and blue networks?
Yes
₹ No
☐ Don't know
If you answered no please help us by explaining how they should be changed, and your reason(s)

Reference is made in 9, above, to the designated green space in Rosemount. Questions need to be asked as to the reason for its designation, and why and how the delineation was decided. This area has as its core the recreation area, currently occupied as POS, with two football pitches available. The area was first designated in the Eastern Area Local Plan 1998, as 'agricultural or open land' and the delineation at that time, skirted some residential garden ground, and included some other garden ground (and, indeed, some residential buildings). Following on from the EALP1983, which had sought to limit further development in Rosemount to 10 housing units, there had been pressure from volume house builders to assemble large sites from within that area, and one could assume that the Agricultural/Open land designation was to address a potential threat from that development pressure. The delineation of the area remained constant through The Eastern Area Local Plan 1997 (Finalised Plan), the adopted Eastern Area Local Plan 1998, the Eastern Area Local Plan Review Strategy and Draft Plan 2005, and continued to include/exclude some residential properties and/or their garden ground (please refer to plans for Blairgowrie that are part of those historical documents).

Fast forward to the current Perth Area LDP 2014 and the area remains as a deterrent to major development, however, the drafting of the delineation shows that different garden grounds are either excluded and/or included within the area. The function of the designation remains the same, however. One area now included is my clients' garden ground at The Struan, in Woodlands Road, notwithstanding that part of it has two extant planning permissions for residential development. It is acknowledged in the Council's Planning Report for the second approval granted for one house at this site, that there may have been a drafting error during the Local Plan process which caused this change

In relation to the inclusion or not of garden ground, I was informed in an email exchange with PKC that The Reporter to the 2014 LDP stated that garden ground could be included if it made a particular contribution to the visual amenity of the area, however, I am not aware of any formal assessment being undertaken by PKC during the LDP process (such as a Visual Impact Assessment) in order to properly assess the level of contribution to local amenity of any of the areas now within. Indeed, whilst the designation may have continued to thwart the efforts of volume builders to intensively develop the area, it's boundaries now exclude the area of the finest formal garden in the area, but includes others that, with respect, contribute nothing to the visual amenity. In addition, there has been a very large house built right in the centre of the Rosemount area, on a raised piece of ground. This house and a very large area of attached ground is currently excluded from the designated area but, when the consent for it was granted, during the Eastern Area Local Plan 1998 period, all of the land forming the site, was included in the area. This house can be seen from very long views, and

further ground around it is also now excluded from the current designation. It is accepted that there was formerly a very small cottage on the site, but to replace it with what is, in effect, the largest and most visible house in Rosemount, asks the question as to whether the reason for the designation is exactly what is stated above, i.e. to prevent land assembly for major development.

We support the retention of a designated area, but in relation to 9, above, submit that it could actually be strengthened by allowing small scale, low density development on the fringes, adjacent to the road system, which could provide for a supplementary structured landscaping plan. This would be in accordance with historical and traditional development in this area, (see the text of the 1983 Eastern Area Local Plan, which acknowledges this) and provide opportunities to a wider market, not accounted for in the current LDP. It would also be consistent with the large house approval referred to, above.

Drawings/Plans are to be lodged with PKC (not electronically) prior to the closing of the consultation period, which identifies the areas included/excluded between the 1998 Plan and the 2014 plan. Furthermore, the amended site and location plan accompanying planning application 06/01776/FUL, stamped as being accepted by PKC in December 2006, delineates the boundary between my clients' garden ground and the designated agricultural land in the 1998 adopted Local Plan. The current LDP boundary has also been added for clarity.

OTHER ISSUES 14. Have we missed any land use planning issue which you consider the revised LDP2 should cover?
Yes
□ No
☑ Don't know
If yes, please detail below, and give reasons for your suggestion(s).
SUPPLEMENTARY GUIDANCE 15. Does the existing LDP have the right balance between Policies and Supplementary Guidance (SG), and does the SG cover the right topic areas?
Yes
▼ No
Don't know
If no, please detail how you think the balance should change &/or which topic areas should be included/excluded, together with your reason(s).
The lack of allocation for housing sites for fewer than five houses means that, at present, this type of development will be 'ad hoc' by nature. Stronger guidance should be given to the types of residential development that could find favour, and what exactly would be required in the way of provision/ planning gain by applicants seeking such approvals.

PART 3 DECLARATIONS

I /the agent accept that details of these issues may be publicised as part of consultation on this and future phases of the preparation of the Local Development Plan.			
Signature			
I/ the agent certify that this is a submission for the Call for Issues process as part of Perth and Kinross Local Development Plan. I hereby confirm that the information given in this form is true and accurate to the best of my knowledge (for electronic submissions, please confirm your statement by ticking the box instead of providing signature).			
Signature:	Donald G Coutts		
Name:	Donald G Coutts		
Date:	24th March 2015		
Any personal data that you have been asked to provide on this form will be held and processed in accordance with the requirements of the 1998 Data Protection Act. 36. How did you find out about the call for sites process? optional question.			
Councils website			
Notice in Newspaper, could you tell us which one below?			
PKC Development Plan Scheme			
Telephone enquiry to Council			
Email enquiry to Council			
Social Media (e.g. Twitter, Facebook)			
Other, could you tell us how below?			
Further information Direct email contact from PKC Planning as part of LDP process			

Completed Submission forms and location plans should be addressed to developmentplan@pkc.gov.uk

Or alternatively by post to:

Local Development Plan Team Perth and Kinross Council Pullar House 35 Kinnoull Street Perth PH1 5GD

The Call for Issues process will run from Tuesday 20 January 2015 for 10 weeks. Completed Submissions must be received by Tuesday 31 March 2015.



Perth and Kinross Local Development Plan

Call for Issues

20 January - 31 March 2015

This form should be used to make a submission to the call for issues process to raise awareness of an issue for consideration in the review of the Perth and Kinross Local Development Plan. Requested information should be concise and to the point.

For help completing this form you are advised to read the associated **Guidance notes** or ring us on 01738 475300

PART 1 APPLICANT AND SITE DETAILS

1. Agents Details (if any)		2. Your details		
Name	Mark Richardson	Name	Mr G Bruce	
Company	Ristol Consulting Ltd	Company	Bruce Farms	
Building No./Name	2 Kirk Street	Building No./Name	Balmyle	
Address	2 Kirk Street Dunblane FK15 0AN	Address	Meigle	
Town/City	Dunblane	Town/ City		
Postcode	FK15 0AN	Postcode	PH12 8QU	
Telephone	01786 823 649	Telephone	Agent	
Mobile	07825 712 090	Mobile	Agent	
Email	mark.richardson@studioristol.co	Email	Agent	
3. Who is the main contact for this submission?				
✓ Agent You				

CLIMATE CHANGE 4. 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 <u>EP1</u> & <u>EP2</u> (and associated <u>Supplementary Guidance</u>) of the existing Local Development Plan (LDP) adequately address this issue?
Yes
□ No
Don't know
If no, tell us what change you would like to see, and why?
HEALTHIER LIVES 5. 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?
Yes
□ No
Don't know
If yes, please tell us what change you would like to see and why?

BUSINESS, TOURISM AND LESIURE 6. Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and businesses?
Yes
□ No
Don't know
If no, please tell us what you consider should change and why?
7. Do the existing LDP policies (ED1-5) adequately encourage new employment sites and businesses?
✓ Yes
No No
Don't know
If no, please tell us what you consider should change and why?
ED3 - support is given for rural diversification as provided by policy ED3, which is considered to be of particular importance in
supporting the growth of countryside businesses. Continuation within LDP2 of this policy presumption in support of the expansion and creation of new rural businesses is essential in creating a land use policy framework that support rural
economic investment.
CITY AND TOWN CENTRES 8. 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?
Yes
□ No
Don't know
If no please tell us for which town(s) and why you consider this to be the case.

RESIDENTIAL DEVELOPMENT 9. Do policies RD1-6 provide a satisfactory framework for consideration of residential development within Perth & Kinross?
✓ Yes
□ No
☐ Don't know
Please give your reason(s) for your answer.
RD3 - support is given to the housing in the countryside policy and the valuable role this has to delivering land for local housing in rural areas. Of particular note is the role the policy can have in the Strathmore area which has witnessed a slow implementation of allocated housing sites within the last two development plan periods. Continuation within LDP2 of this policy presumption in support of countryside housing is essential in creating a land use policy framework that supports investment in the rural economy.
LOW CARBON TRAVEL, HEAT AND POWER 10. 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 policy ER1, Transport policy TA1 and Climate Change, Carbon Reduction and Sustainable Construction policy EP1 of the existing LDP need updating to enable Perth & Kinross Council to fulfill its obligations in this respect?
☐ Yes
No
☐ Don't know
If yes, please tell us what changes you consider would be appropriate and why?
RESOURCE SECURITY 11. Existing policy <u>ER3</u> 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?

12. Are other Natural Resources adequately protected by the LDP Policies (ER3)?
Yes
□ No
Don't know
If no, explain what aspects of the policy you consider should be altered and why?
GREEN/BLUE NETWORKS
Green/Blue spaces and networks include any area of open space whether public or private; gardens, parks, woodlands and hedgerows. These are all important. It also includes water systems such as rivers, lakes and ponds, and the coastline. Networks refer to the interlinking of these spaces and features all of which have a host of benefits, for both people and biodiversity, e.g. Being utilised for travel to work (such as a footpath network), for leisure (e.g. parkland, woodland, sea-shore) or perhaps providing a habitat for important species.
13. Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately protect and promote green and blue networks?
Yes
✓ No
Don't know
If you answered no, please help us by explaining how they should be changed, and your reason(s).
OTHER ISSUES 14. Have we missed any land use planning issue which you consider the revised LDP2 should cover?
Yes
□ No
Don't know

If yes, please detail below, a	nd give reasons for your suggestion(s).
SUPPLEMENTARY GUIDAN 15. Does the existing LDP the SG cover the right topi	have the right balance between Policies and Supplementary Guidance (SG), and does
✓ Yes	
□ No	
Don't know	
If no, please detail how you t with your reason(s).	think the balance should change &/or which topic areas should be included/excluded, together
Housing in the Countryside	
Support is given to the hous	ing in the countryside supplementary guidance and its support for rural development as set out in
policy RD3.	ing in the country-side supplementary guidance and its support for rural development as set out in
PART 3 DECLARATIONS	
/the agent accept that o	details of these issues may be publicised as part of consultation on this and future phases
	Local Development Plan.
Signature	
Development Plan. I her	nis is a submission for the Call for Issues process as part of Perth and Kinross Local eby confirm that the information given in this form is true and accurate to the best of my c submissions, please confirm your statement by ticking the box instead of providing
Signature:	
Name:	C Mark Richardson
Date:	31st March 2015

Any personal data that you have been asked to provide on this form will be held and processed in accordance with the requirements of the 1998 Data Protection Act.

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Call for Issues

20 January - 31 March 2015

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For help completing this form you are advised to read the associated **Guidance notes** or ring us on 01738 475300

1. Agents Details (if any)		2. Your details	
Name	Mark Richardson	Name	John Dewar Lamberkin Trust
Company	Ristol Consulting Ltd	Company	
Building No./Name	2 Kirk Street	Building No./Name	
Address	2 Kirk Street Dunblane FK15 0AN	Address	
Town/City	Dunblane	Town/ City	
Postcode	FK15 0AN	Postcode	
Telephone	01786 823 649	Telephone	
Mobile		Mobile	
Email	mark.richardson@studioristol.co	Email	
3. Who is the main contact	for this submission?		
Agent You			

CLIMATE CHANGE 4. 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 <u>EP1</u> & <u>EP2</u> (and associated <u>Supplementary Guidance</u>) of the existing Local Development Plan (LDP) adequately address this issue?
Yes No Don't know
If no, tell us what change you would like to see, and why?
HEALTHIER LIVES 5. 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?
Yes No Don't know
If yes, please tell us what change you would like to see and why?

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CITY AND TOWN CENTURE
CITY AND TOWN CENTRES 8. 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?
Yes
□ No
☐ Don't know
If no please tell us for which town(s) and why you consider this to be the case.

RESIDENTIAL DEVELOPMENT 9. Do policies RD1-6 provide a satisfactory framework for consideration of residential development within Perth & Kinross?
Yes
✓ No
☐ Don't know
Please give your reason(s) for your answer.
RD3 - see commentary below on supplementary guidance housing in the countryside.
LOW CARBON TRAVEL, HEAT AND POWER 10. 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 policy <u>ER1</u> , Transport policy <u>TA1</u> and Climate Change, Carbon Reduction and Sustainable Construction policy <u>EP1</u> of the existing LDP need updating to enable Perth & Kinross Council to fulfill its obligations in this respect?
☐ Yes
□ No
☐ Don't know
If yes, please tell us what changes you consider would be appropriate and why?
RESOURCE SECURITY 11. Existing policy <u>ER3</u> 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?

12. Are other Natural Resources adequately protected by the LDP Policies (ER3)?
Yes
□ No
☐ Don't know
If no, explain what aspects of the policy you consider should be altered and why?
GREEN/BLUE NETWORKS
Green/Blue spaces and networks include any area of open space whether public or private; gardens, parks, woodlands and hedgerows. These are all important. It also includes water systems such as rivers, lakes and ponds, and the coastline. Networks refer to the interlinking of these spaces and features all of which have a host of benefits, for both people and biodiversity, e.g. Being utilised for travel to work (such as a footpath network), for leisure (e.g. parkland, woodland, sea-shore) or perhaps providing a habitat for important species.
13. Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately protect and promote green and blue networks?
Yes
✓ No
☐ Don't know
If you answered no, please help us by explaining how they should be changed, and your reason(s).
Policy NE 5 - see commentary below on supplementary guidance Green Belts
OTHER ISSUES 14. Have we missed any land use planning issue which you consider the revised LDP2 should cover?
Yes
□ No
☐ Don't know

if yes, please detail below, and give reasons for your suggestion(s).
SUPPLEMENTARY GUIDANCE 15. Does the existing LDP have the right balance between Policies and Supplementary Guidance (SG), and does the SG cover the right topic areas?
☐ Yes
✓ No
Don't know
If no, please detail how you think the balance should change &/or which topic areas should be included/excluded, together with your reason(s).
Housing in the Countryside
It is our client's view that the Housing in the Countryside policy establishes a sound policy basis to direct and regulate rural residential development. The policy provides an important contribution to rural housing land supply and it would seem logical that the policy is incorporated into the new Local Development Plan. We therefore support the policy principles.
In relation to changes to the policy, our client supports the framework contained within the policy, particularly the drive for the sensitive siting of new development and the advancement of high quality design. Our client notes the role of building groups and clusters as defined in the policy, and their importance in controlling the siting of new development.
It is within this context that our client requests that Perth & Kinross Council re-assess the relative merits of restricting development within building groups to sites outwith designated green belts only and amend policies NE 5, RD3 and the housing in the countryside policy respectively. This restriction seems to introduce an unnecessary layer of control given the definition of building groups and infill sites and what is therefore permitted within these defined area. As witnessed by recent planning consents, the Housing in the Countryside policy advances sound land use change within rural areas. To this effect, whether the site under consideration is within the green belt or not should have limited, if any bearing, since the overall Housing in the Countryside policy thrust is to permit acceptable development within the countryside.
The recent SPP seeks to encourage a vibrant and dynamic rural economy. Our client notes that the objectives of green belts policy are to protect the landscape setting and character of an area and to support public access to the countryside. It is unlikely that developing within building groups such as redundant steadings would override this strategic policy function. However, removing green belt as a policy constraint for developing within building groups would support rural enterprise and access to the countryside. Anecdotal evidence suggests that rural locations are more likely to support home work enterprises and local employment ventures.
PART 3 DECLARATIONS
I/the agent accept that details of these issues may be publicised as part of consultation on this and future phases of the preparation of the Local Development Plan.
Signature
I/ the agent certify that this is a submission for the Call for Issues process as part of Perth and Kinross Local Development Plan. I hereby confirm that the information given in this form is true and accurate to the best of my knowledge (for electronic submissions, please confirm your statement by ticking the box instead of providing signature).

Signature:	
Name:	C Mark Richardson
Date:	31st March 2015
Any personal data that you have requirements of the 1998 Dat	ave been asked to provide on this form will be held and processed in accordance with the a Protection Act.
36. How did you find out ab	out the call for sites process? optional question.
Councils website	
Notice in Newspaper, cou	ıld you tell us which one below?
PKC Development Plan S	Scheme
Telephone enquiry to Cou	ıncil
Email enquiry to Council	
Social Media (e.g. Twitter	, Facebook)
Other, could you tell us he	ow below?
Furtherinformation	

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Call for Issues

20 January - 31 March 2015

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For help completing this form you are advised to read the associated **Guidance notes** or ring us on 01738 475300

1. Agents Details (if any)		2. Your details	
Name	Mark Richardson	Name	Mr N Lowe
Company	Ristol Consulting Ltd	Company	
Building No./Name	2 Kirk Street	Building No./Name	
Address	2 Kirk Street Dunblane FK15 0AN	Address	
Town/City	Dunblane	Town/ City	
Postcode	FK15 0AN	Postcode	
Telephone	01786 823 649	Telephone	Agent
Mobile	07825 712 090	Mobile	Agent
Email	mark.richardson@studioristol.co	Email	Agent
3. Who is the main contact	for this submission?		
Agent You			

CLIMATE CHANGE 4. 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 <u>EP1</u> & <u>EP2</u> (and associated <u>Supplementary Guidance</u>) of the existing Local Development Plan (LDP) adequately address this issue?
Yes
□ No
Don't know
If no, tell us what change you would like to see, and why?
HEALTHIER LIVES 5. 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?
Yes
□ No
Don't know
If yes, please tell us what change you would like to see and why?

BUSINESS, TOURISM AND LESIURE 6. Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and businesses?
Yes
✓ No
☐ Don't know
If no, please tell us what you consider should change and why?
Perth & Kinross Council's economic development strategy seeks to support the a range of business sectors closely aligned to the economic and social characteristics of Perthshire. This includes rural tourism projects.
Policy ED 3 supports rural business diversification.
It is requested that policy ED 4C is revised to support the growth of new rural tourism businesses through the development of appropriately located and scaled new chalet projects and not restricted solely to existing rural businesses. Location, layout, scale, design and occupation uses can be restricted through the policy mechanisms contained in policy ED4 and complimentary development management policies.
7. Do the existing LDP policies (ED1-5) adequately encourage new employment sites and businesses?
Yes
□ No
☐ Don't know
If no, please tell us what you consider should change and why?
CITY AND TOWN CENTRES 8. 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?
Yes
□ No
☐ Don't know
If no please tell us for which town(s) and why you consider this to be the case.
i

9. Do policies RD1-6 provide a satisfactory framework for consideration of residential development within Perth & Kinross?
Yes
√ No
Don't know
Please give your reason(s) for your answer.
LOW CARBON TRAVEL, HEAT AND POWER 10. 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 policy ER1, Transport policy TA1 and Climate Change, Carbon Reduction and Sustainable Construction policy EP1 of the existing LDP need updating to enable Perth & Kinross Council to fulfill its obligations in this respect?
Yes
□ No
Don't know
If yes, please tell us what changes you consider would be appropriate and why?
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RESOURCE SECURITY 11. 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?
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Yes
□ No
Don't know
If no, explain what aspects of the policy you consider should be altered and why?
GREEN/BLUE NETWORKS
Green/Blue spaces and networks include any area of open space whether public or private; gardens, parks, woodlands and hedgerows. These are all important. It also includes water systems such as rivers, lakes and ponds, and the coastline. Networks refer to the interlinking of these spaces and features all of which have a host of benefits, for both people and biodiversity, e.g. Being utilised for travel to work (such as a footpath network), for leisure (e.g. parkland, woodland, sea-shore) or perhaps providing a habitat for important species.
13. Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately protect and promote green and blue networks?
Yes
✓ No
Don't know
If you answered no, please help us by explaining how they should be changed, and your reason(s).
OTHER ISSUES 14. Have we missed any land use planning issue which you consider the revised LDP2 should cover?
Yes
□ No
Don't know

If yes, please detail below, ar	nd give reasons for your suggestion(s).	
SUPPLEMENTARY GUIDAN 15. Does the existing LDP I the SG cover the right topic	nave the right balance between Policies and Supplementary Guidance (SG), and does	
Yes		
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Don't know		
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Signature		
Development Plan. I here	is is a submission for the Call for Issues process as part of Perth and Kinross Local eby confirm that the information given in this form is true and accurate to the best of my submissions, please confirm your statement by ticking the box instead of providing	
Signature:		
Name:	C Mark Richardson	
Date:	31st March 2015	

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If no please tell us for which town(s) and why you consider this to be the case.

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13. Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately protect and promote green and blue networks?
Yes
✓ No
☐ Don't know
If you answered no, please help us by explaining how they should be changed, and your reason(s).
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OTHER ISSUES 14. Have we missed any land use planning issue which you consider the revised LDP2 should cover?
Yes
□ No
☐ Don't know

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SUPPLEMENTARY GUIDANCE 5. Does the existing LDP have the right balance between Policies and <u>Supplementary Guidance (</u> SG), and does he SG cover the right topic areas?		
Yes		
▼ No		
Don't know		
f no, please detail how you think the balance should change &/or which topic areas should be included/excluded, together vith your reason(s).		

Housing in the Countryside

It is our client's view that the Housing in the Countryside policy establishes a sound policy basis to direct and regulate rural residential development. The policy provides an important contribution to rural housing land supply and it would seem logical that the policy is incorporated into the new Local Development Plan. We therefore support the policy principles.

In relation to changes to the policy, our client supports the framework contained within the policy, particularly the drive for the sensitive siting of new development and the advancement of high quality design. Our client notes the role of building groups and clusters as defined in the policy, and their importance in controlling the siting of new development.

It is within this context that our client requests that Perth & Kinross Council re-assess the relative merits of restricting development within building groups to sites outwith designated green belts only and amend policies NE 5, RD3 and the housing in the countryside policy respectively. This restriction seems to introduce an unnecessary layer of control given the definition of building groups and infill sites, and what is therefore permitted within these defined area. As witnessed by recent planning consents, the Housing in the Countryside policy advances sound land use change within rural areas. To this effect, whether the site under consideration is within the green belt or not should have limited, if any bearing, since the overall Housing in the Countryside policy thrust is to permit acceptable development within the countryside.

The recent SPP seeks to encourage a vibrant and dynamic rural economy. Our client notes that the objectives of green belts policy are to protect the landscape setting and character of an area and to support public access to the countryside. It is unlikely that developing within building groups would override this strategic policy function. However, removing green belt as a policy constraint for developing within building groups or steadinsg would support rural enterprise and access to the countryside. Anecdotal evidence suggests that rural locations are more likely to support home work enterprises and local employment ventures.

PART 3 DECLARATIONS

I /the agent accept that details of these issues may be publicised as part of consultation on this and future phases of the preparation of the Local Development Plan.			
Signature			
I/ the agent certify that this is a submission for the Call for Issues process as part of Perth and Kinross Local Development Plan. I hereby confirm that the information given in this form is true and accurate to the best of my knowledge (for electronic submissions, please confirm your statement by ticking the box instead of providing signature).			
Signature:			
Name:	C Mark Richardson		
Date:	31st March 2015		
Any personal data that you have been asked to provide on this form will be held and processed in accordance with the requirements of the 1998 Data Protection Act. 36. How did you find out about the call for sites process? optional question.			
Councils website			
Notice in Newspaper, could you tell us which one below?			
PKC Development Plan Scheme			
Telephone enquiry to Council			
Email enquiry to Council			
Social Media (e.g. Twitter, Facebook)			
Other, could you tell us h	ow below?		
Furtherinformation			

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Or alternatively by post to:

Local Development Plan Team Perth and Kinross Council Pullar House 35 Kinnoull Street Perth PH1 5GD

Methven and District Community Council

Call for Issues and Sites

Methven Community Council wishes to see the following issues re-considered at this time. Most are relevant to the western edge of Perth, and to the expansion of the city.

1) Plans and Priorities for West / North West Perth

The 3 major sites for large residential development are in this sector, with Almond Valley and Perth West lying in our area, and with Bertha Park contiguous north of the River Almond. In all 3 sites Master Plans are in preparation, with Developers seeking early starts, and at Bertha Park the Council is committed to early construction of a school and access road.

How are decisions to be made about the adequacy and timing of these Master Plans, and on possible approvals for major growth?

We request a re-examination of the scale and timing of new residential developments, in order to seek a phased programme of land releases, compatible with realistic building programmes and Infra structure provision - a Masterplan of the 3 site based Masterplans is vital.

2) Almond Valley

This proposal, in its boundaries, coincides with a tenanted farm unit, and parts, such as the field south east of Almondbank estate, and land south of the A85 Jet garage, are disconnected from the main part of the site and need special consideration. These parts may relate to existing settlements – e.g. Almondbank, or to infrastructure needs. We want to see the future needs of existing places included.

We continue to believe that the proposed development is potentially damaging to the Landscape and to the communities living there. We suggest that large scale residential development should not be approved in order to safeguard the interests of the local communities and to conserve this area's recreational value to the whole of Perth.

3) The landscape of this site requires special attention, comprising the valley of the Almond, and its flanking woodlands. The existing settlements also have distinctive characters, with traces of their industrial past, and their conservation will be a challenge. The Town's Lade is of special interest, cherished by locals. Outwith our area, Bertha Park shares many of these aspects.

4) Perth West

If government has finalised plans for the A9, Broxden and the Tibbermore junctions, then proposals at Lamberkin may be feasible. In our view Perth West is the preferred option. Our strong preference, as noted in 2) above, is to retain Bertha Park and Perth West, and to refuse Almond Valley.

- 5) Rural Issues
- a) Gask Ridge Roman Frontier

The recent studies by Woolliscroft and Hoffmann have demonstrated the European significance of this tract, from Huntingtower westwards to Raith, and it would be opportune to designate the Ridge and seek to enhance its heritage character, while protecting it from sporadic development.

b) Sma' Glen

Now that the eastern side of the Glen lies in our area, and in view of the recent refusal of windfarms at Mull Hill, we suggest

the Plan should contain a landscape zone where windfarms and other inappropriate development should be excluded.

MDCC March 2015



Call for Issues

20 January - 31 March 2015

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For help completing this form you are advised to read the associated **Guidance notes** or ring us on 01738 475300

1. Agents Details (if any)		2. Your details		
Name	Ewan Maclean	Name		
Company	Emac Planning LLP	Company	Crieff Hydro Limited	
Building No./Name	Ballinard House	Building No./Name		
Address	3 Davidson Street Broughty Ferry	Address		
Town/City	Dundee	Town/ City	Crieff	
Postcode	DD53AS	Postcode	PH7 3LQ	
Telephone	01382738822	Telephone		
Mobile		Mobile		
Email	ewan@emacplanning.co.uk	Email		
3. Who is the main contact for this submission?				
✓ Agent You				

CLIMATE CHANGE 4. 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 <u>EP1</u> & <u>EP2</u> (and associated <u>Supplementary Guidance</u>) of the existing Local Development Plan (LDP) adequately address this issue?
Yes No Don't know
If no, tell us what change you would like to see, and why?
HEALTHIER LIVES 5. 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?
Yes No Don't know
If yes, please tell us what change you would like to see and why?

BUSINESS, TOURISM AND LESIURE 6. Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and businesses?
Yes
✓ No
☐ Don't know
If no, please tell us what you consider should change and why?
Crieff Hydro Estate, Crieff
Further to the above consultation we write in response on behalf of Crieff Hydro Limited as follows.
A Local Development Plan (LDP) is a land use planning document which should include a clear long term economic and environmental strategy that reflects local needs, priorities and circumstances.
The emerging LDP should therefore provide a policy context which encourages business diversification and facilitates and increased tourism spend in the area.
The current LDP has a raft of polices to support rural business and diversification; enabling development; support to major tourist resorts; expansion of significant resort complexes which play a significant role in the local, national and international tourism economy; etc. However, when proposals are submitted which generally accord with such policies there appears to be a hesitancy to support viable economic development if it does not accord exactly with every other detailed policy of the plan.
Using Crieff Hydro as an example of an existing hotel and tourism destination, there is significant support in the current LDP for the current proposals known as Project East however more weight appears to be given to the analysis of individual elements of the proposal rather than a holistic approach being taken to the overall benefits to the area and the material circumstances of the overall tourism, environmental and business case.
We would therefore support more specific policy criteria and indeed a specific land use allocation which clearly sets out a positive policy context for the Estate area. We therefore suggest that the whole Estate be designated a tourism / leisure centre of excellence where appropriate diversification of tourism uses and accommodation can be encouraged and not fettered by a general application of other more general countryside policies.
New Designation of the Estate, plan attached, to be covered by specific criteria as follows:
"Crieff Hydro Estate.
As a tourism / leisure centre of excellence the improvement, expansion or diversification of the Crieff Hydro facilities will be encouraged and the landscape setting which is integral to their tourism offer protected from developments with the potential to adversely impact upon it"
7. Do the existing LDP policies (ED1-5) adequately encourage new employment sites and businesses?
Yes
✓ No
☐ Don't know
If no, please tell us what you consider should change and why?
Please refer to 6 above.

CITY AND TOWN CENTRES 8. 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?
Yes
□ No
☐ Don't know
If no please tell us for which town(s) and why you consider this to be the case.
RESIDENTIAL DEVELOPMENT 9. Do policies RD1-6 provide a satisfactory framework for consideration of residential development within Perth & Kinross?
Yes
□ No
☐ Don't know
Please give your reason(s) for your answer.
LOW CARBON TRAVEL, HEAT AND POWER 10. 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 policy ER1, Transport policy TA1 and Climate Change, Carbon Reduction and Sustainable Construction policy EP1 of the existing LDP need updating to enable Perth & Kinross Council to fulfill its obligations in this respect?
Yes
□ No
☐ Don't know
If yes, please tell us what changes you consider would be appropriate and why?
II you, production do what changes you consider the date of specific to the constant of the co

RESOURCE SECURITY 11. Existing policy <u>ER3</u> 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?
12. Are other Natural Resources adequately protected by the LDP Policies (ER3)?
Yes
□ No
Don't know
If no, explain what aspects of the policy you consider should be altered and why?
GREEN/BLUE NETWORKS
Green/Blue spaces and networks include any area of open space whether public or private; gardens, parks, woodlands and hedgerows. These are all important. It also includes water systems such as rivers, lakes and ponds, and the coastline. Networks refer to the interlinking of these spaces and features all of which have a host of benefits, for both people and biodiversity, e.g. Being utilised for travel to work (such as a footpath network), for leisure (e.g. parkland, woodland, sea-shore) or perhaps providing a habitat for important species.
13. Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately protect and promote green and blue networks?
Yes
□ No
Don't know
If you answered no, please help us by explaining how they should be changed, and your reason(s).

OTHER ISSUES 14. Have we missed any lan	nd use planning issue which you consider the revised LDP2 should cover?	
Yes		
No		
Don't know		
If yes, please detail below, a	nd give reasons for your suggestion(s).	
SUPPLEMENTARY GUIDAN 15. Does the existing LDP the SG cover the right topi	have the right balance between Policies and Supplementary Guidance (SG), and does	
Yes		
No		
☐ Don't know		
If no, please detail how you think the balance should change &/or which topic areas should be included/excluded, together with your reason(s).		
PART 3 DECLARATIONS		
TANT O DECEMBRION		
L/the agent accent that	details of these issues may be publicised as part of consultation on this and future phases	
	Local Development Plan.	
Signature		
Development Plan. I her	his is a submission for the Call for Issues process as part of Perth and Kinross Local reby confirm that the information given in this form is true and accurate to the best of my ic submissions, please confirm your statement by ticking the box instead of providing	
Signature:	Ewan Maclean	
Name:	Ewan Maclean	
Date:	30.03.15	

36. How did you find out about the call for sites process? optional question.
✓ Councils website
Notice in Newspaper, could you tell us which one below?
PKC Development Plan Scheme
Telephone enquiry to Council
Email enquiry to Council
Social Media (e.g. Twitter, Facebook)
Other, could you tell us how below?

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Or alternatively by post to:

Further information

requirements of the 1998 Data Protection Act.

Local Development Plan Team Perth and Kinross Council Pullar House 35 Kinnoull Street Perth PH1 5GD

The Call for Issues process will run from Tuesday 20 January 2015 for 10 weeks. Completed Submissions must be received by Tuesday 31 March 2015.



Perth and Kinross Local Development Plan

Call for Issues

20 January - 31 March 2015

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For help completing this form you are advised to read the associated **Guidance notes** or ring us on 01738 475300

PART 1 APPLICANT AND SITE DETAILS

1. Agents Details (if any)		2. Your details	
Name		Name	Bruce Hamilton
Company		Company	
Building No./Name		Building No./Name	
Address		Address	
Town/City		Town/ City	
Postcode		Postcode	
Telephone		Telephone	
Mobile		Mobile	
Email		Email	
3. Who is the main contact	for this submission?		
Agent Vou			

PART 2 IDENTIFYING ISSUES

CLIMATE CHANGE 4. 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 <u>EP1</u> & <u>EP2</u> (and associated <u>Supplementary Guidance</u>) of the existing Local Development Plan (LDP) adequately address this issue?
Yes
□ No
Don't know
If no, tell us what change you would like to see, and why?
HEALTHIER LIVES 5. 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?
Yes
□ No
Don't know
If yes, please tell us what change you would like to see and why?

BUSINESS, TOURISM AND LESIURE 6. Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and businesses?
Yes
□ No
Don't know
If no, please tell us what you consider should change and why?
7. Do the existing LDP policies (ED1-5) adequately encourage new employment sites and businesses?
☐ Yes ☐ No
Don't know
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CITY AND TOWN CENTRES 8. 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?
Yes
□ No
Don't know
If no please tell us for which town(s) and why you consider this to be the case.

RESIDENTIAL DEVELOPMENT 9. Do policies RD1-6 provide a satisfactory framework for consideration of residential development within Perth & Kinross?
Yes
✓ No
Don't know
Please give your reason(s) for your answer.
The current adopted LDP acknowledges a role for rural housing and looks to achieve active enhancement of the environment, whilst avoiding inappropriate development. Policy RD5 gives general support for a range of categories which is positive. However it requires to comply with the housing in the countryside 'guide'.
I have significant concern that strict adherence to this 'guide' appears to be the focus for decision making rather than looking to achieve the best planning outcome. Therefore I am of the view that this area requires proper re-examination to ensure appropriate flexibility. To have a requirement that a brownfield site should have been "formally" occupied by buildings is too narrow. It can be the case that buildings are unsightly and the best planning solution is sensitive redevelopment of the site. However there is often a viability issue of demolition in advance of any certainty for re-use through the benefit of planning consent.
LOW CARBON TRAVEL, HEAT AND POWER 10. 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 policy ER1, Transport policy TA1 and Climate Change, Carbon Reduction and Sustainable Construction policy EP1 of the existing LDP need updating to enable Perth & Kinross Council to fulfill its obligations in this respect?
Yes
□ No
Don't know
If yes, please tell us what changes you consider would be appropriate and why?

12. Are other Natural Resources adequately protected by the LDP Policies (ER3)?
Yes
□ No
☐ Don't know
If no, explain what aspects of the policy you consider should be altered and why?
GREEN/BLUE NETWORKS
Green/Blue spaces and networks include any area of open space whether public or private; gardens, parks, woodlands and
hedgerows. These are all important. It also includes water systems such as rivers, lakes and ponds, and the coastline. Networks refer to the interlinking of these spaces and features all of which have a host of benefits, for both people and
biodiversity, e.g. Being utilised for travel to work (such as a footpath network), for leisure (e.g. parkland, woodland, sea-shore) or perhaps providing a habitat for important species.
13. Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately protect and promote green and blue networks?
Yes
Don't know
If you arewared no places help us by explaining hearther should be changed and your recent(s)
If you answered no, please help us by explaining how they should be changed, and your reason(s).
OTHER ISSUES 14. Have we missed any land use planning issue which you consider the revised LDP2 should cover?
Yes
□ No
☐ Don't know

If yes, please detail below,	and give reasons for your suggestion(s).
SUPPLEMENTARY GUIDA 15. Does the existing LDI	P have the right balance between Policies and <u>Supplementary Guidance</u> (SG), and does
the SG cover the right to	pic areas?
☐ Yes ☐ No	
☐ Don't know	
If no, please detail how you with your reason(s).	u think the balance should change &/or which topic areas should be included/excluded, together
PART 3 DECLARATION	S
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Signature	
Development Plan. I he	this is a submission for the Call for Issues process as part of Perth and Kinross Local creby confirm that the information given in this form is true and accurate to the best of my nic submissions, please confirm your statement by ticking the box instead of providing
Signature:	
Name:	Bruce Hamilton
Date:	31st March 2015

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36. How did you find out about the call for sites process? optional question.
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KINROSS-SHIRE CIVIC TRUST

Helping protect, conserve and develop a better built and natural environment

Ashtrees Wester Balgedie KINROSS KY13 9HE 01592 840215

e-mail: info@kinross-shirecivictrust.org
30th March 2015.

Brenda Murray
Team Leader, Local Development Plan
Perth and Kinross Council
Development Control
Pullar House
35 Kinnoull Street
PERTH
PH1 5GD

Dear Ms Murray

Perth and Kinross Local Development Plan Call for Issues and Sites

Kinross-shire Civic Trust has been very concerned for some time now about the styles of housing being permitted in some rural areas and settlements.

Up to about 4 to 5 years ago, Perth and Kinross Council would only permit Single storey houses in these rural areas and settlements. It held a very strict rule about this. However, the foot seems to have come of the brake pedal, no doubt from pressure from developers, who want to construct a higher density of housing and have more houses per hectare than was permitted in the past.

As a compromise permission has been granted for one and a half storey houses. However it is the interpretation of what is a one and a half storey actually and developers are interpreting this very liberally. Effectively they are being given permission for 2 storey houses. They have vestigial dormers just let in to the roof space, but the effective floor space of the upper floor is the same as the ground floor, the ridge height is the same as a 2 storey house.

The Trust's definition of a one and a half storey house is that the eaves of the roof come right down to the first floor level and the effective floor area as a consequence is somewhat less than the ground floor. This usually results in a lower ridge line. The visual impact on the rural areas is therefore quite significantly reduced, not as much as a single storey house, but significant.

One of the worst examples of this is the Wellside on the south west of Scotlandwell. This has to be one of the worst examples of planning blight in Perth and Kinross in recent years and must not be allowed to happen again. Photographs are attached but approaching Scotlandwell from the south along the B920, one is faced with a solid 2 storey 'Berlin' wall

Chairman – Mr Alistair Smith, Treasurer – Mr Ken Miles, Secretary - Mrs Eileen Thomas P:\Planning\Development Planning New\Local Development Plan\LDP 2\Call for sites\Received\LDP pre MIR submissions\Redacted\ISSUES\150329 Rural Housing.doc

which effectively severs the Conservation Area of Scotlandwell from the south. The site is sitting on a considerable depth of very soft material and required pre-compaction of many tonnes of stone material to pre-compact the foundation so that settlement would be reduced. Building 2 storey houses there rather single storey ones only exacerbates the potential settlement problem.





H54, Scotlandwell:

The Reporter stipulated that the housing in H54 must be no higher than one and a half storey. There is an allowance in LDP1 for some 30 houses in this area for a plot not much bigger than the Wellside plot which has 18 houses on it. The density of that looks

Chairman – Mr Alistair Smith, Treasurer – Mr Ken Miles, Secretary - Mrs Eileen Thomas P:\Planning\Development Planning New\Local Development Plan\LDP 2\Call for sites\Received\LDP pre MIR submissions\Redacted\ISSUES\150329 Rural Housing.doc

considerable enough and the southern strip has 7 Houses lined up with scarcely a gap between them constituting a virtual 'Solid' wall.

All the new houses behind H54 are single storey. The foundation problems for H54 will be as bad as Wellside if not worse and the latest SEPA Flooding maps show H54 is within the flood plain. All this will inevitably set the solum at a very high level, if planning permission is granted, which will create a severe impact on the surroundings as well as cutting of the existing houses behind.

This kind of so-called One and a Half Storey development – in fact a 2 storey development – must not be permitted on H54, or on any other housing development in the rural areas and settlements. There has to be a proper definition as to what a one and a half storey house constitutes as the Trust has defined above

The fact that Wellside Scotlandwell was granted Planning Permission beggars belief and everyone who sees it is absolutely appalled. This must not be permitted alongside Wellside.

Yours sincerely

For and on behalf of Kinross-shire Civic Trust Cc PKC Local Members

KINROSS-SHIRE CIVIC TRUST

Helping protect, conserve and develop a better built and natural environment

Ashtrees Wester Balgedie KINROSS KY13 9HE 01592 840215

e-mail: info@kinross-shirecivictrust.org
30th March 2015.

Brenda Murray
Team Leader, Local Development Plan
Perth and Kinross Council
Development Control
Pullar House
35 Kinnoull Street
PERTH
PH1 5GD

Dear Ms Murray

Perth and Kinross Local Development Plan Call for Issues and Sites

Kinross-shire Civic Trust has the following responses to make to the Policies of LDP1 as to how they should be responded in LDP2.

Policy ED4 Caravan Sites, Chalets and Timeshare Developments

The Trust is concerned about the definitions of chalet and timeshare/fractional developments. Despite the provisos stated in the Policy that they cannot be used as permanent residences, it feels that there is an open door for future conversion, by straight change or by extensions to make the dwellings more attractive to future home purchasers

Policy RD3: Housing in the Countryside

The interpretation as to what constitutes gap infill or grouping is being interpreted somewhat liberally in some cases and permission granted. These definitions need to be tightened up and enforced.

Similarly the interpretation of replacement of existing dwellings is being very liberally interpreted in some cases, small 2 room single storey houses being replaced by 2 storey 4/5 bedroom suburban dwellings.

Policy RD5: Gypsy/Traveller Sites

The Trust is very concerned that there should no longer be any future such traveller sites in Kinross-shire. These sites appear by creeping into place and are detrimental to surrounding establishments

Chairman – Mr Alistair Smith, Treasurer – Mr Ken Miles, Secretary - Mrs Eileen Thomas P:\Planning\Development Planning New\Local Development Plan\LDP 2\Call for sites\Received\LDP pre MIR submissions\Redacted\ISSUES\150329 Response to Call for Issues.doc

Policy TA1: Transport Standards and Accessibility Requirements

In the rural areas concerns should be given to the villages and hamlets through which access is taken to new developments. The access requirements to these developments have significantly increased over the years, particularly with internet buying now requiring courier deliveries and supermarket deliveries

These are also high concerns for long term sustainability and high carbon generation

Policy CF3: Social and Community Facilities

This should be expanded to include areas such as Conservation Areas or which affect village settings

Policy ER5: Prime agricultural Land

The Trust is concerned that ALL Prime Agricultural Land must be retained for long term future use. It should not be frittered away for even small scale housing/commercial development. After the Second Word War, Britain undertook a policy that it would never be dependent on imported food. It now imports 40% of its food and that is a policy that cannot be sustained.

Settlement Boundaries: The Trust would wish to see the Settlement Boundary for Kinross retained. It would not wish to see it extended to the west side of the M90.

In LDP1 some Settlement Boundaries for some smaller settlements were removed with the Plan relying on the Housing in the Countryside Policy. The Trust is not convinced that the HiC Policy can be relied for this purpose. It would wish that the Settlement Boundaries in the 2004 Plan be reinstated.

Housing:

The Trust would wish to know what the next Local Plan is going to say about the provision of housing and whether it is the intention to further increase the provision of housing land. LDP1 has considerable amounts of housing land that has not been taken up and is not likely to be taken up for some considerable time due to the continued economic stagnation.

Windfall Sites: There is an allowance for 10% for so-called windfall sites. Rural Kinross-shire has at present some 50-55% of windfall sites which may well continue. This is not sustainable as there is no provision in the infrastructure for this considerable additional burden.

The Trust has had great concerns about the styles of housing being allowed in the rural areas now which are now amounting to 2 storey 4/5 suburban villas which are totally inappropriate to their setting. A separate letter describes in detail the Trust's concerns

Yours sincerely

For and on behalf of Kinross-shire Civic Trust Cc PKC Local Members



Perth and Kinross Local Development Plan

Call for Issues

20 January - 31 March 2015

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PART 1 APPLICANT AND SITE DETAILS

1. Agents Details (if any)		2. Your details	
Name		Name	Michael Cairns
Company		Company	Tactran
Building No./Name		Building No./Name	Bordeaux House
Address		Address	31 Kinnoull Street
Town/City		Town/ City	Perth
Postcode		Postcode	PH1 5EN
Telephone		Telephone	01738475774
Mobile		Mobile	
Email		Email	michaelcairns@tactran.gov.uk
3. Who is the main contact Agent You	for this submission?		

PART 2 IDENTIFYING ISSUES

CLIMATE CHANGE 4. 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 Local Development Plan (LDP) adequately address this issue? ☐ No ☐ Don't know If no, tell us what change you would like to see, and why? **HEALTHIER LIVES** 5. 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? ☐ Yes **✓** No ☐ Don't know If yes, please tell us what change you would like to see and why?

BUSINESS, TOURISM AND LESIURE 6. Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and businesses?
✓ Yes
□ No
Don't know
If no, please tell us what you consider should change and why?
7. Do the existing LDP policies (ED1-5) adequately encourage new employment sites and businesses?
✓ Yes
✓ Don't know
If no, please tell us what you consider should change and why?
CITY AND TOWN CENTRES 8. 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?
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□ No
Don't know
If no please tell us for which town(s) and why you consider this to be the case.

Kinross?
✓ Yes
□ No
Don't know
Please give your reason(s) for your answer.
LOW CARBON TRAVEL, HEAT AND POWER 10. 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 policy <u>ER1</u> , Transport policy <u>TA1</u> and Climate Change, Carbon Reduction and Sustainable Construction policy <u>EP1</u> of the existing LDP
need updating to enable Perth & Kinross Council to fulfill its obligations in this respect?
Yes
✓ No
Don't know
If yes, please tell us what changes you consider would be appropriate and why?
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12. Are other Natural Resources adequately protected by the LDP Policies (ER3)?
✓ Yes
□ No
Don't know
If no, explain what aspects of the policy you consider should be altered and why?
GREEN/BLUE NETWORKS
Green/Blue spaces and networks include any area of open space whether public or private; gardens, parks, woodlands and hedgerows. These are all important. It also includes water systems such as rivers, lakes and ponds, and the coastline. Networks refer to the interlinking of these spaces and features all of which have a host of benefits, for both people and biodiversity, e.g. Being utilised for travel to work (such as a footpath network), for leisure (e.g. parkland, woodland, sea-shore) or perhaps providing a habitat for important species.
13. Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately protect and promote green and blue networks?
✓ Yes
□ No
Don't know
If you answered no, please help us by explaining how they should be changed, and your reason(s).
OTHER ISSUES 14. Have we missed any land use planning issue which you consider the revised LDP2 should cover?
✓ Yes
□ No
Don't know

Any personal data that you have been asked to provide on this form will be held and processed in accordance with the requirements of the 1998 Data Protection Act.

6. How did you find out about the call for sites process? optional question.
Councils website
Notice in Newspaper, could you tell us which one below?
PKC Development Plan Scheme
Telephone enquiry to Council
Email enquiry to Council
Social Media (e.g. Twitter, Facebook)
Other, could you tell us how below?
Further information Email from LDP Team

Completed Submission forms and location plans should be addressed to developmentplan@pkc.gov.uk

Or alternatively by post to:

Local Development Plan Team Perth and Kinross Council Pullar House 35 Kinnoull Street Perth PH1 5GD

The Call for Issues process will run from Tuesday 20 January 2015 for 10 weeks. Completed Submissions must be received by Tuesday 31 March 2015.

From:

To: TES Development Plan - Generic Email Account

Subject: Proposed Local Plan- settlement boundaries

Date: 31 March 2015 12:12:07

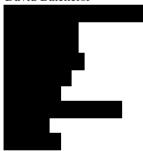
Settlement boundaries in Portmoak

Scotlandwell and Kilmagadwood should retain their current, separate settlement boundaries. The undeveloped land between Portmoak church at the east edge of Kilmagadwood and the northern end of Scotlandwell serves an important role in separating the two settlements. Any development on this site should be prevented in order to maintain the different character of these settlements; it would also impact negatively on the visual amenity of the area and the setting of the adjacent Scotlandwell Conservation Area.

Similarly, no development should be allowed in the field between the Kilmagadwood settlement boundary and Woodmarch. It is important to protect and enhance the rural environment by reserving these two undeveloped sites as open spaces.

Yours Dave

David Batchelor



From:

To: <u>TES Development Plan - Generic Email Account</u>
Subject: Comments on the Development Plan Feb 2014

Date: 31 March 2015 14:01:30

To: <u>DevelopmentPlan@pkc.gov.uk</u>

Hello,

I would like to make a few comments about the proposals for Scotlandwell and Kilmagadwood in the Local Plan adopted in February. My two basic concerns are:

- 1) Preserving the rural and historic nature of Portmoak Parish by sensibly regulating the increase in the housing supply, and
- 2) Ensuring a safe footpath between Scotlandwell and the church and Village Hall

Reference # H54 - Land to the south of Scotlandwell that has been proposed to contain up to 30 houses

When this site was being considered for housing a few years ago I attended an open information day that your department hosted in Kinross. At that time, your representative suggested to me that the site "could contain up to 30 houses" but that if the application was submitted suggesting less than 30 it would be welcomed". As you hopefully (and painfully) already know, the houses that have been erected on the west side of the southern approach to Scotlandwell (Wellside) were allowed to be built so high as to block out the rest of the village on that side. In addition, they are very close together and of a design alien to the village that leaves it looking like a urban housing estate rather than the historic village nestled into the side of the Bishop Hill.

Because this situation was overlooked by the Planning Department we are very concerned that the east side of the southern approach to Scotlandwell will look the same, or even worse. If there are too many houses, the designers will have to "go up" to a second floor to get enough rooms into each house. With fewer houses, designers can propose one-floor living, which is consistent with the other houses in that area and not scar the village any further. In addition, one floor living is more suitable for an aging population in this area.

Map on page 234 and 7.17.3 Infrastructure Considerations

On your map on page 234 the boundaries of the village of Scotlandwell and the hamlet of Kilmagadwood are separate. There is a large field between the church and the north end of the village that is currently used as a pasture. My concern in the plan is that it appears to be suggesting that an application for houses in this field and/or the field to the south of it would be considered, resulting in excessive infill development. Under 7.17.3 the plan states "Encouragement will be given to proposals which provide additional parking or path improvements to serve "The Green", which indirectly refers to this site. Given that the number of houses already approved will increase the population of Scotlandwell by 50%, any further houses in this area would be placing a serious capacity burden on the current residents. I believe Scotlandwell, and the whole of the Parish, has done

its share of contributing to the housing supply in the area already without resorting to uncontrolled and unwanted "ribbon development".

Currently, residents in Scotlandwell are cut off from walking to the many activities being offered at our church and Village Hall as the current footpath under the hill is too narrow. On the other hand, a safe new footpath leading from the church into Scotlandwell on the SOUTH SIDE of the A911 would be most welcomed. The land would have to be purchased from the owner of the field in question but in no way should that land purchase sanction the construction of new houses. All along the A911 in our area farmers have shown themselves to be community minded and have cooperatively sold their land for safe footpaths. I would expect the owner of this field to do the same without any "planning permission blackmail" being tolerated.

Thank you, and I hope you will take these suggestions seriously for the benefit of our parish and its inhabitants.

Sincerely,

Wendy MacPhedran, Chairman of the Portmoak Village Hall, and ex-Chairman of the Portmoak Community Council



Perth and Kinross Local Development Plan

Call for Issues

20 January - 31 March 2015

This form should be used to make a submission to the call for issues process to raise awareness of an issue for consideration in the review of the Perth and Kinross Local Development Plan. Requested information should be concise and to the point.

For help completing this form you are advised to read the associated **Guidance notes** or ring us on 01738 475300

PART 1 APPLICANT AND SITE DETAILS

1. Agents Details (if any)		2. Your details	
Name		Name	Duncan Pritchard
Company		Company	N/A
Building No./Name		Building No./Name	
Address		Address	
Town/City		Town/ City	
Postcode		Postcode	
Telephone		Telephone	
Mobile		Mobile	
Email		Email	
3. Who is the main contact	for this submission?		
☐ Agent ✓ You			

PART 2 IDENTIFYING ISSUES

4. 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 <u>EP1</u> & <u>EP2</u> (and associated <u>Supplementary Guidance</u>) of the existing Local Development Plan (LDP) adequately address this issue?
Yes
□ No
☑ Don't know
If no, tell us what change you would like to see, and why?
HEALTHIER LIVES 5. 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?
Yes
□ No
✓ Don't know
If yes, please tell us what change you would like to see and why?

BUSINESS, TOURISMAND LESIURE 6. Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and businesses?
Yes
□ No
☑ Don't know
If no, please tell us what you consider should change and why?
7. Do the existing LDP policies (ED1-5) adequately encourage new employment sites and businesses?
Yes
□ No
✓ Don't know
If no, please tell us what you consider should change and why?
CITY AND TOWN CENTRES
CITY AND TOWN CENTRES 8. 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?
Yes
□ No
✓ Don't know
If no please tell us for which town(s) and why you consider this to be the case.
If no please tell us for which town(s) and why you consider this to be the case.

RESIDENTIAL DEVELOPMENT 9. Do policies RD1-6 provide a satisfactory framework for consideration of residential development within Perth & Kinross?
Yes
☐ No
□ Don't know
Please give your reason(s) for your answer.
LOW CARBON TRAVEL, HEAT AND POWER 10. 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 policy <u>ER1</u> , Transport policy <u>TA1</u> and Climate Change, Carbon Reduction and Sustainable Construction policy <u>EP1</u> of the existing LDP need updating to enable Perth & Kinross Council to fulfill its obligations in this respect?
☐ Yes
□ No
☑ Don't know
If yes, please tell us what changes you consider would be appropriate and why?
RESOURCE SECURITY 11. Existing policy <u>ER3</u> 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?

12. Are other Natural Resources adequately protected by the LDP Policies (ER3)?
Yes
□ No
☑ Don't know
If no, explain what aspects of the policy you consider should be altered and why?
GREEN/BLUE NETWORKS
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13. Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately protect and promote green and blue networks?
Yes
□ No
☑ Don't know
If you answered no, please help us by explaining how they should be changed, and your reason(s).
OTHER ISSUES 14. Have we missed any land use planning issue which you consider the revised LDP2 should cover?
✓ Yes
□ No
☐ Don't know

If yes, please detail below, and give reasons for your suggestion(s).

- 1. The loss of the AGLV designation from the Naemoor area in Crook of Devon under the current plan was very disappointing. This designation was supposed to be replaced by an alternative designation (Local Landscape Areas) that would afford an equivalent level of protection. However, I understand that Councillors recently voted against the extension of the Local Landscape Areas to include the Cleish Hills, River Devon Gorge, Lochleven, Ochil Hills and Portmoak. I am very disappointed to hear this news and would like this issue reconsidered in the Main Issues Report. Our landscape is a huge asset, which is very important for the tourism trade in the area. Not affording protection to this natural asset would be a grave mistake that would not only affect the quality of life of constituents but would also fail to safeguard the revenue that tourism brings to the area.
- 2. I note that the Monarch Deer Farm on Naemoor Road in Crook of Devon is no longer within the settlement boundary in the current Local Plan and I would like to see Policy PM4 upheld robustly by PKC. I am pleased that the site is not designated for housing development. It should be noted that the last planning application for the site was refused and that there was significant local opposition to development at this location. Local residents, including myself, are opposed to the site coming forward as a future development site. There seems to be a sufficient number of infill plots in the Crook of Devon to satisfy the demand for new development.

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SUPPLEMENTARY G 15. Does the existing the SG cover the right	LDP have the right balance between Policies and Supplementary Guidance (SG), and does
Yes	
∐ No	
Don't know	
If no, please detail how with your reason(s).	you think the balance should change &/or which topic areas should be included/excluded, together
does not perform adec response. Conseque	any of the questions are answered with "Don't Know" is that the Perth and Kinross Council's web site quately. The hyperlinks in this document work but the website does not respond. I am still waiting for antly I am unable to comment meaningfully on many aspects. I find this frustrating and obstructive. If need, please upgrade your web presence.
PART 3 DECLARAT	TIONS
	t that details of these issues may be publicised as part of consultation on this and future phases of the Local Development Plan.
Signature	
Development Plan	that this is a submission for the Call for Issues process as part of Perth and Kinross Local I hereby confirm that the information given in this form is true and accurate to the best of my ctronic submissions, please confirm your statement by ticking the box instead of providing
Signature:	
Name:	Duncan Pritchard
Date:	31/03/2015

Any personal data that you have been asked to provide on this form will be held and processed in accordance with the requirements of the 1998 Data Protection Act.

36. How did you find out about the call for sites process? optional question.	
Councils website	
Notice in Newspaper, could you tell us which one below?	
PKC Development Plan Scheme	
Telephone enquiry to Council	
Email enquiry to Council	
Social Media (e.g. Twitter, Facebook)	
Other, could you tell us how below?	
Further information Word of mouth	

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Or alternatively by post to:

Local Development Plan Team Perth and Kinross Council Pullar House 35 Kinnoull Street Perth PH1 5GD

The Call for Issues process will run from Tuesday 20 January 2015 for 10 weeks. Completed Submissions must be received by Tuesday 31 March 2015.

Mid Atholl Strathtay and Grandtully Community Council

31 March 2015

Local Development Plan Team
Perth and Kinross Council
Pullar House
35 Kinnoull Street
Perth
PH1 5GD

<u>Local Development Plan – Call for Issues</u>

Response from Mid Atholl, Strathtay and Grandtully Community Council

Dear sir/madam,

The Community Council has considered the local area in which it represents residents and the issues facing residents.

The key issue that has been raised, discussed and minuted at many of our Community Council meetings is the traffic and congestion at Ballinluig. This is an issue of growing concern to several residents and PKC convened a public consultation meeting on this topic in the Mid Atholl Hall on 9th June 2012. At the consultation meeting several suggestions were put forward as to how the traffic and congestion could be reduced in the village and a number of discussions took place following the meeting as to how the suggestions might be implemented. The Community Council urges PKC to revisit these suggestions to see how it might be possible to improve the situation for residents and businesses alike. We can only see the traffic increasing over time so the issues, raised some years ago, have now become much more significant as traffic volumes rise.

Another issue to be raised is that almost all of the recent development in Grandtully and Little Ballinluig (i.e. south of the River Tay) has taken place at the western side of Little Ballinluig. The result is that newer houses are much more distant from the Grandtully/Strathtay village "centre" based on the location of the village hall, churches, village shop and the eating and drinking establishments. The Community Council view is that if there is a need for further housing development in the area, then consideration should be given to sites other than in Little Ballinluig as Little Ballinluig has already approximately doubled in size in recent years.

Yours faithfully

Stuart Smith

Chair, on behalf of the Mid Atholl, Strathtay and Grandtully Community Council



30th March 2015

Attention of the PKC Development Plan Team

Perth & Kinross Council Development Plan Pre-MIR Call for Issues Consultation

I am concerned that this process of engagement has got off to a "false start".

It is my understanding that there is an obligation on the Local Authority to first establish how participants might want the Development Plan Scheme to operate and I am unaware of any attempts by PKC to encourage potential participants to "look at the development plan scheme and provide feedback on the proposals for engagement." (ref: PAN 3/2010 Community Engagement)

Regarding my own locality of Kinross-shire I am only aware of one meeting a "Planning Workshop", held on 14th May 2014 at Kinross Campus

A large and representitive group from all Community Councils and other Civic Groups were present at that meeting.

Those present were unanimous (by a show of hands) in indicating to Council Officers their concerns regarding lack of due process and lack of meaningful engagement by PKC by failing to take account and failing to respond to concerns raised.

It was established this applied to all Community Representitives, including Elected Members whose letters were either not dealt with adequately or even ignored

This meeting was later mis-represented by officers in minutes to the Planning Users Forum as being "not productive".

With this background this latest part of Development Plan process would seem an empty gesture other than as a benefit for any would-be developers to answer the "call for sites".

The format devised is in reality the setting of an agenda by officers rather than being a genuinely open attempt at a meaningful engagement to seek issues from the wider public.

It appears just more of the same old approach of seeking yet more development sites rather than taking a sustainable approach to make the best use of what already exists and develop detailed policies and planning briefs appropriate to local circumstances.

Regarding Kinross-shire I would wish to make the following points for consideration.

The Settlement Boundaries should remain as in the only recently Adopted Plan.

After this forensic process the reporter concluded that the now well established principle of development containment by the M90 Motorway should remain as a defensible barrier to development westward.

Regarding Employment Land the Reporter established that available land already "greatly exceeds" requirements.

The findings established that there was no evidence of the need to release further land to the west of the M90 to meet the requirements of the local community during the Plan period.

It is odd then that within three months of adoption of the Plan, Forward Planner Mr Peter Marshal was suggesting at the May 2014 Planning Workshop that there might be a need to revisit this issue due to his "interpretation" of the Reporters findings.

On the matter of "interpretation" PKC officers have claimed in Council reports that findings by Reporters and adopted in the Development Plan are "purely indicative".

On checking this I am advised that the Reporters findings and the resultant Plan is prescriptive and not for "interpretation" by officers.

I would be obliged if I could have clarification on this matter by PKC officers as this is fundemental to the whole process now the subject of engagement. Would you please advise me accordingly?

I am not aware of any vision or plan in regard to the future development of Kinross-shire.

The area has very specific strengths which are not being adequately further supported in the Development Plan process to bring about appropriate development opportunities.

In particular Loch Leven has an established ability to generate a sustainable economic benefit to the area and currently draws 250,000 visitors annually.

However there is very little being done to to improve even the most basic infrastructure to support this excellent asset of Kinross-shire.

Access from Kinross Town via Pier Road is poor. The Car Park at the Pier is a mess.

Past opportunities to improve this situation have been lost as a result of housing opportunities being favoured instead.

Opportunities to require conditions to incorporate improved Loch Leven access in these housing plans by way of forward planning have been omitted.

Plans and policies should now be a priority in order to support the valuable contribution Loch Leven currently brings to the economic wellbeing of Kinross-shire and the great potential it has to bring more.

There has been too much diversion towards an ill-conceived notion of the need for additional Economic Development land instead of a focus on making the very best use of the assets that already exist.

The profile of those living in the area shows quite clearly that the highly qualified workforce is by nature well suited to a short commute to the larger centres of population and employment.

The strength of the area is the attractive nature of the environment with the benefit of ease of access to these employment hubs.

Policies that recognise this sustainable relationship are therefore appropriate.

Plans and Policies that result in an over-developed and therefore less attractive area to live in obviously serve to undo this and work against this sustainable balance.

Unfortunately to date this over-development policy seems to be the guiding principle being applied across the Perth and Kinross Council area to the detriment of communities.

Ken Miles



Perth and Kinross Local Development Plan

Call for Issues

20 January - 31 March 2015

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For help completing this form you are advised to read the associated **Guidance notes** or ring us on 01738 475300

PART 1 APPLICANT AND SITE DETAILS

1. Agents Details (if any)		2. Your details	
Name		Name	
Company	Colliers International	Company	The Gleneagles Hotel & Resort
Building No./Name	39	Building No./Name	
Address	George Street	Address	Auchterarder
Town/City	Edinburgh	Town/ City	Perthshire
Postcode	EH2 2HN	Postcode	PH3 1NF
Telephone	0131 240 7500	Telephone	
Mobile		Mobile	
Email	meabhann.crowe@colliers.com	Email	
3. Who is the main contact	for this submission?		
Agent You			

PART 2 IDENTIFYING ISSUES

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BUSINESS, TOURISM AND LESIURE 6. Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and businesses?
Yes
✓ No
☐ Don't know
If no, please tell us what you consider should change and why?
ED1 Employment and Mixed Use Areas – It is considered that the following sentence requires to be reworded as in its present form is considered too restrictive: "Within these areas any proposed development must be compatible with surrounding land uses". This should instead read: "Preference should be given to uses compatible with surrounding land uses in the first instance."
ED3 Rural Business and Diversification - It is considered that this policy in the main as currently written is sufficient to be continued in the emerging LDP. However, the sentiment expressed within the sentence "Proposals where viability requires some mainstream residential development will only be supported where this fits with the Plans housing policies" requires to be carefully cross-referenced with policies RD1: Residential Areas, RD3: Housing in the Countryside.
ED4 Caravan Sites, Chalets and Timeshare Development is supported as written, with one exception at Policy ED4C (a) where by "Such developments must also (a) involve the expansion of an existing hotel, guest house, chalet park, caravan park or timeshare or fractional ownership development where the development does not constitute either overdevelopment of the site or its setting" It is held that the wording of this policy is overly-restrictive and instead should read "Such developments should normally also"
ED5 Major Tourism Resorts is supported as written in the main.
7. Do the existing LDP policies (ED1-5) adequately encourage new employment sites and businesses?
✓ Yes
□No
☐ Don't know
If no, please tell us what you consider should change and why?
It is considered that, in the main, these policies do positively encourage new employment sites and businesses, however as a general comment it is considered that there is some unnecessary rigidness in terms of wording of policies and that more flexible language could, where appropriate, be introduced by the Council.
CITY AND TOWN CENTRES 8. 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?
Yes
□No
☐ Don't know

If no please tell us for which town(s) and why you consider this to be the case.

N/A
RESIDENTIAL DEVELOPMENT 9. Do policies RD1-6 provide a satisfactory framework for consideration of residential development within Perth & Kinross?
Yes
☑ No
☐ Don't know
Please give your reason(s) for your answer.
It is presumed that this question refers also the relevant supplementary guidance published by the Council.
RD3 – Housing in the Countryside: refers to associated SG: Housing in the Countryside, Section 3. This specific Section refers to linkages to economic activity at paragraph 3.3 which is accepted. The Siting Criteria noted within Section 3 of the SG requires to be revised, specifically criterion (c) which explicitly calls for any sub-division of land "artificially, for example by post and wire fence or newly planted hedge or tree belt in order to create the site, will not be acceptable". It is strongly considered that the application of such strict criteria in rural areas is not practical and should not be a barrier to development where it can be demonstrated by the Applicant that sensitive and appropriate boundaries to enclose/delineate the site can be successfully created as part of the proposal.
LOW CARBON TRAVEL, HEAT AND POWER 10. 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 policy ER1, Transport policy TA1 and Climate Change, Carbon Reduction and Sustainable Construction policy EP1 of the existing LDP need updating to enable Perth & Kinross Council to fulfill its obligations in this respect?
Yes
□ No
☐ Don't know
If yes, please tell us what changes you consider would be appropriate and why?

RESOURCE SECURITY 11. Existing policy <u>ER3</u> 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?
12. Are other Natural Resources adequately protected by the LDP Policies (ER3)?
☐ Yes ☐ No
☐ Don't know
If no, explain what aspects of the policy you consider should be altered and why?
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13. Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately protect and promote green and blue networks?
✓ Yes
□No
Don't know
If you answered no, please help us by explaining how they should be changed, and your reason(s).
Blue networks are not acknowledged in the policies of the Plan at present. Within SG "Green Networks include blue features such as rivers and wetlands" It is considered that while both green and blue networks often occur together, blue networks should be defined within the emerging Plan.

14. Have we missed any land use planning issue which you consider the revised LDP2 should cover?			
Yes			
✓ No			
Don't know			
If yes, please detail below, a	and give reasons for your suggestion(s).		
SUPPLEMENTARY GUIDAN 15. Does the existing LDP the SG cover the right topi	have the right balance between Policies and Supplementary Guidance (SG), and does		
✓ Yes			
☐ No			
Don't know			
If no, please detail how you think the balance should change &/or which topic areas should be included/excluded, together with your reason(s).			
	_		
PART 3 DECLARATIONS	5		
	details of these issues may be publicised as part of consultation on this and future phases Local Development Plan.		
Signature			
/ I/ the agent certify that this is a submission for the Call for Issues process as part of Perth and Kinross Local			
Development Plan. I he	reby confirm that the information given in this form is true and accurate to the best of my ic submissions, please confirm your statement by ticking the box instead of providing		
Signature:			
Name:	Meabhann Crowe of Colliers International on behalf of The G		
Date:	31 March 2015		

36. How did you find out about the call for sites process? optional question.		
Councils website		
Notice in Newspaper, could you tell us which one below?		
PKC Development Plan Scheme		
Tolophone anguiry to Council		
Telephone enquiry to Council		
Empil onquiry to Council		
Email enquiry to Council		
Casial Madia (a.g. Tujitar Fasahaak)		
Social Media (e.g. Twitter, Facebook)		
Other, could you tell us how below?		
Cities, could you tell us now below:		

Any personal data that you have been asked to provide on this form will be held and processed in accordance with the

Completed Submission forms and location plans should be addressed to developmentplan@pkc.gov.uk

Or alternatively by post to:

Further information

Local Development Plan Team Perth and Kinross Council Pullar House 35 Kinnoull Street Perth PH1 5GD

requirements of the 1998 Data Protection Act.

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Perth and Kinross Local Development Plan

Call for Issues

20 January - 31 March 2015

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For help completing this form you are advised to read the associated **Guidance notes** or ring us on 01738 475300

PART 1 APPLICANT AND SITE DETAILS

1. Agents Details (if any)		2. Your details	
Name	Angus Dodds	Name	
Company	Smiths Gore	Company	
Building No./Name	22	Building No./Name	
Address	Young Street	Address	
Town/City	Edinburgh	Town/ City	
Postcode	EH10 4PA	Postcode	
Telephone	0131 344 0892	Telephone	
Mobile		Mobile	
Email	Angus.Dodds@smithsgore.co.u	Email	
3. Who is the main contact for this submission?			
Agent You			

PART 2 IDENTIFYING ISSUES

CLIMATE CHANGE 4. 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 Local Development Plan (LDP) adequately address this issue?
□ No
☐ Don't know
If no, tell us what change you would like to see, and why?
HEALTHIER LIVES 5. 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?
Yes
□ No
Don't know
If yes, please tell us what change you would like to see and why?

6. Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and businesses? Yes No Don't know

If no, please tell us what you consider should change and why?

BUSINESS. TOURISM AND LESIURE

The current SPP provides explicit support to tourism as one of the Scottish Government's key industries to be supported as part of the Government's Economic Strategy (SPP paragraph 94). Visit Scotland's Tourism Development Framework (2013) provides a national perspective for how tourism growth should be pursued. It is made clear in this document and within both NPF3 (paragraph 4.27) and SPP (paragraph 100) that the Tourism Development Framework is to be considered as a material consideration in the determination of planning applications, and in the production of Local Development Plans.

In the circumstances, while we welcome paragraph 3.3.6 of the existing LDP, we consider that the status of both the Tourism Development Framework and associated regional 'Action Plans for Development,' should be highlighted in the text of the Local Development Plan. Such inclusion will help to ensure that these documents are taken into account by decision makers, providing clarity and assisting them when assessing planning applications for tourism related developments across the Perth and Kinross area.

Proposed amendment to paragraph 3.3.6 to the following:

Tourism is recognised in the Government's Economic Strategy as one of the nation's key business sectors. Tourism accounts for 13% of all employment in Perth and Kinross. Visit Scotland's Tourism Development Framework (2014) offers a vision for how the sector can be grown in the context of Scotland's planning system, and this document and its associated regional Action Plans for Development are recognised as material considerations in National Planning Framework 3 and SPP.

General support for tourism-related developments and facilities will continue to be given in accordance with these key documents, which should be referred to in the consideration of all tourism related applications

Regarding policy ED3: Rural Business & Diversification, this policy could be altered as follows;

Paragraph 94 of SPP highlights the particular opportunity for growth in relation to tourism and the food and drink sector and the need for Development Plans to align with local economic strategies in order to help planning authorities to meet the needs and opportunities of indigenous firms and inward investors in such key sectors. Paragraph 100 also states that "Development Plans should be informed by the Tourism Development Framework for Scotland in order to maximise the sustainable growth of regional and local visitor economies".

It is acknowledged that support for retailing must balance the need to sustain existing retail centres with the need to increase choice and diversification of the general retail sector. Accordingly we consider that Farm shops, which by their more specialist, visitor-orientated nature will not adversely impact on the convenience retail offer of adjacent settlements should be supported more explicitly in policy. They are rarely offering any kind of competition to existing centres whose retail offer is of a very different nature. It is vital that the LDP is in line with the requirements of the economic policies in SPP

Policy ED3 could explicitly provide support for destination, niche retailing of a range of sizes from the House of Bruar experience to more local farm shops. Such retailing outlets frequently offer a specific visitor experience or are complementary to, and an intrinsic part of, other visitor attractions. We therefore propose that policy ED3 be amended to offer such support by stating the following:

"The Council will give favourable consideration to the expansion of existing businesses and the creation of new ones in rural areas. There is a preference that this will generally be within or adjacent to existing settlements. Although sites outside settlements may be acceptable where they offer opportunities to diversify an existing business, or are related to a site specific resource, local produce or other site specific opportunity. This is provided that they will contribute to the local economy through the provision of permanent employment, or visitor accommodation, or additional tourism or recreational facilities, including FARM SHOPS or involve the re-use of existing buildings".

And in relation to the criteria used in this policy,

"All proposals will be expected to meet all the following criteria: (a-e and g, as existing)

Criteria (f) should be changed to state: "Outwith settlement centres, retailing will only be acceptable if it can be demonstrated that it is either, ancillary to the main use of the site and would not be deemed to prejudice the vitality of existing retail centres in adjacent settlements, or is providing a niche, destination, retailing experience which supports the tourism/visitor offer of Perth and Kinross and enhances the overall visitor experience of the area"

The third paragraph of Policy ED3 deals with "proposals whose viability requires some mainstream residential development" but refers to "where this fits with the Plan's policies". It is not clear what is meant by this and to which housing policies they are referring. Therefore the policy position is unclear. Housing of this type has a key role to play in either ensuring a business can function by providing a necessary on-site presence, or by providing a source of capital which can support the viability of rural businesses. There should therefore be positive support for such proposals and this policy should be more explicit in its support.

7. Do the existing LDP policies (ED1-5) adequately encourage new employment sites and businesses?
Yes
✓ No
Don't know
If no, please tell us what you consider should change and why?
The existing policy ED5 offers support to existing significant resort complexes. However both the National Planning Framework 3 (paragraph 4.27) and SPP (paragraph 100) stress that Development Plans should support Visit Scotland's Tourism Development Framework for Scotland. The Tourism Development Framework further supports the document 'Aspirations and Ambitions – Our Development Opportunities' which offers a regional perspective on how best to realise the development of further tourism opportunities. The section of this document that relates to Perth and Kinross stresses that there are existing opportunities to support the development of visitor accommodation at various scales.
The document highlights the following:
 Investment opportunities are highlighted in new and existing hotel accommodation, including the country house hotel product, within the main tourism locations in Perthshire. Opportunities for more accommodation to support the activities at Perth Concert Hall and the city's events and festivals portfolio.
- Opportunities for the provision of additional self-catering accommodation (where deficiencies are identified), bunkhouse provision, holiday parks and novel low carbon development which support the wider 'rural tourism product'.
In the circumstances, it is proposed that a new policy be added in addition to policy ED5 to reflect the need for a variety of visitor accommodation.
Proposed Policy ED6: Visitor Accommodation (as follows):
The Plan area includes a number of significant resort complexes which play a significant role in the local, national and international tourism economy. The improvement or expansion of these facilities will be encouraged and the landscape setting which is integral to their tourism offer will be protected from developments with the potential to adversely impact upon it.
The Plan area has also been recognised in Visit Scotland's Tourism Development Framework for Scotland as one where there are opportunities for the development of visitor accommodation on a variety of scales including: Country House hotels; bunkhouse provision; holiday parks and novel forms of small-scale low carbon developments which support the wider 'rural tourism product'. Proposals to expand the choice and supply of such accommodation will be encouraged where these can be sited in appropriate locations and be shown to enhance the visitor experience of the local area.
CITY AND TOWN CENTRES 8. 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?
Yes
□ No
□ Don't know

If no please tell us for which town(s) and why you consider this to be the case.

RESIDENTIAL DEVELOPMENT 3. Do policies RD1-6 provide a satisfactory framework for consideration of residential development within Perth & Kinross?
☐ Yes
No
Don't know
Please give your reason(s) for your answer.
LOW CARBON TRAVEL, HEAT AND POWER 10. 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 policy ER1, Transport policy TA1 and Climate Change, Carbon Reduction and Sustainable Construction policy EP1 of the existing LDP meed updating to enable Perth & Kinross Council to fulfill its obligations in this respect?
Yes
Don't know
f yes, please tell us what changes you consider would be appropriate and why?

RESOURCE SECURITY 11. Existing policy <u>ER3</u> 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?
12. Are other Natural Resources adequately protected by the LDP Policies (ER3)?
Yes
□ No
☐ Don't know
If no, explain what aspects of the policy you consider should be altered and why?
GREEN/BLUE NETWORKS
Green/Blue spaces and networks include any area of open space whether public or private; gardens, parks, woodlands and hedgerows. These are all important. It also includes water systems such as rivers, lakes and ponds, and the coastline. Networks refer to the interlinking of these spaces and features all of which have a host of benefits, for both people and biodiversity, e.g. Being utilised for travel to work (such as a footpath network), for leisure (e.g. parkland, woodland, sea-shore) or perhaps providing a habitat for important species.
13. Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately protect and promote green and blue networks?
Yes
□ No
☐ Don't know
If you answered no, please help us by explaining how they should be changed, and your reason(s).

OTHERISSUES 14. Have we missed any land use planning issue which you consider the revised LDP2 should cover? Yes No Don't know If yes, please detail below, and give reasons for your suggestion(s).

On behalf of our clients we would like to propose amendments to the Perth Area Spatial Strategy or raise points for consideration in the drafting of an updated Spatial Strategy for the Perth area in the Main Issues Report.

SPP recognises that in developing a spatial strategy Planning Authorities should identify the most sustainable locations for longer-term development (paragraph 50). The National Planning Framework 3 also recognises that our understanding of what constitutes a sustainable community is changing (paragraph 2.7).

Paragraph 5.1.2 of the current LDP stresses that only limited development in the Carse of Gowrie has been identified in the Local Development Plan owing to the direction given in TAYplan that there should be a presumption against allocating significant development land releases in the area.

In line with SPP it is considered that paragraph 5.1.2 should be augmented by recognising not only the important role the Carse of Gowrie has now, but also the potential the area will have in the future.

The Carse of Gowrie is an agriculturally important inter-urban area, which has great potential to serve the leisure needs of both Dundee and Perth, and Scotland more generally. It also contains villages such as Errol which are recognised in the current LDP as having a healthy range of amenities and services and that are well linked via the national cycle network to the urban centres it serves.

While the TAYplan position is well understood at present, we consider that owing to its location and existing services, the Carse of Gowrie has considerable potential in the future to act as an exemplar for sustainable development. The current spatial strategy should therefore be used as a platform for the area to realise its potential by, as a first step, strengthening the active networks that already exist to link the area with the urban centres to the east and west.

We therefore consider that the LDP should recognise that active and sustainable travel should be explicitly encouraged in the Carse of Gowrie. This will strengthen the areas connectivity to its urban neighbours, and will future-proof the area as one where sustainable development can be undertaken in the period after the currently identified strategic development areas have been completed, or when alternative sites for development are sought.

Proposed amendment to paragraph 5.1.2:

TAYplan also indicates that there is a presumption against allocating development land releases in areas surrounding the Dundee and Perth Cores including Carse of Gowrie where it would prejudice the delivery of strategic development areas. However, recognising the considerable potential for the Carse of Gowrie to offer space for leisure and activities close to these urban centres, an objective of the plan will be to help foster enhanced recreation and tourism opportunities in the area by strengthening walking and cycling links to Dundee and Perth, and to offer support to small scale developments that can help sustain the existing amenities and services in local villages.

Paragraph 5.5 of the National Planning Framework 3 states that 'The action plan for cycling.... Sets a vision of 10% of journeys by bike by 2020 – our substantially increased funding will help to ensure that this vision is realised. We expect action on walking and cycling to extend through both urban and rural areas'. SPP, through paragraph 228 further states that 'Local Development Plans should safeguard access rights and core paths, and encourage new and enhanced opportunities for access linked to wider networks.'

The continued development of a national long distance cycling and walking network is recognised as a national Development within National Planning Framework 3. The text supporting this national development states that 'The development should focus on making best use of existing path networks – Scotland's great trails, the national cycling network and the Scottish Canal network. It should seek to close key gaps, upgrade community routes, build on local core path networks, and link with public transport'.

It is noticeable that within the section on Transport Infrastructure in the existing Perth Area Spatial Strategy (page 69) limited mention is made of cycling provision, despite the biggest single constraint facing the Perth area being identified as 'the capacity of the roads infrastructure in and around Perth.' (5.1.14). In accordance with the expectations of National Planning Framework 3, and with our representation regarding Errol's potential role as a walking and cycling exemplar settlement, we consider that measures to improve cycling infrastructure around Perth should be included within the 'Transport Infrastructure' section of the Perth Area Spatial Strategy.

Proposed addition Paragraph 5.1.19:

The Council in partnership with the Scottish Government and its Agencies and local stakeholders, will seek to actively

support and facilitate new and enhanced walking and cycling routes and facilities.

The National Planning Framework 3 requests at paragraph 5.14 that each Local Authority area in Scotland identifies at least one exemplar settlement for walking and cycling. Errol currently lies on National Cycle Network route number 77, and is ideally located midway between Perth and Dundee to act as an attractive destination for leisure cyclists and walkers from these urban centres, as well as offering a realistic base from which facilities for commuter cyclists to either city could be situated.

Unlike some other settlements in the Perth and Kinross area, the development of walking and particularly cycling facilities in and around Errol has the potential to genuinely change travel patterns at the inter-urban heart of the TAYplan area. Such changes over time would help to evidence the success of TAYplan and the TAYplan area as a dynamic region where sustainable development has been considered at a regional level to help achieve the vision and objectives of both the City region and the Local Planning Authority.

Recommendation 1: Amend 5.16 'Errol' to the following:

5.16.2 The village is well positioned to attract and sustain developments and enhancements associated with walking and cycling. The Council therefore wishes to see Errol become an exemplar settlement for walking and cycling over the course of this Local Development Plan period as encouraged in National Planning Framework 3. The Council will work with the Scottish Government and its Agencies along with the local community and other relevant stakeholders to consider how this can be realised, and may publish Supplementary Guidance to provide greater detail for how this can achieved.

Recommendation 2: add a further section within paragraph 5.16.3:

'Enhancements to walking and cycling routes and facilities will be pursued in this Local Development Plan period.'

SUPPLEMENTARY GUIDANCE
15. Does the existing LDP have the right balance between Policies and <u>Supplementary Guidance</u> (SG), and does the SG cover the right topic areas?
Yes
□ No
☐ Don't know
If no, please detail how you think the balance should change &/or which topic areas should be included/excluded, together with your reason(s).

PART 3 DECLARATIONS

I /the agent accept that details of these issues may be publicised as part of consultation on this and future phases of the preparation of the Local Development Plan.			
Signature			
I/ the agent certify that this is a submission for the Call for Issues process as part of Perth and Kinross Local Development Plan. I hereby confirm that the information given in this form is true and accurate to the best of my knowledge (for electronic submissions, please confirm your statement by ticking the box instead of providing signature).			
Signature:			
Name:	Angus Dodds		
Date:	31/03/2015		
requirements of the 1998 Data Protection Act. 36. How did you find out about the call for sites process? optional question. Councils website			
	uld you tell us which one below?		
PKC Development Plan S	•		
Telephone enquiry to Council			
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Other, could you tell us he	ow below?		
Furtherinformation			
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Perth and Kinross Local Development Plan

Call for Issues

20 January - 31 March 2015

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PART 1 APPLICANT AND SITE DETAILS

1. Agents Details (if any)		2. Your details	
Name	Robert Patrick	Name	
Company	CKD Galbraith	Company	Balmanno Farms Ltd
Building No./Name	Lynedoch House	Building No./Name	
Address	Barossa Place	Address	
Town/City	Perth	Town/ City	
Postcode	PH1 5EP	Postcode	
Telephone	01738 456 078	Telephone	
Mobile		Mobile	
Email	robert.patrick@ckdgalbraith.co.u	Email	
3. Who is the main contact for this submission?			
Agent You			

PART 2 IDENTIFYING ISSUES

CLIMATE CHANGE 4. 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 <u>EP1</u> & <u>EP2</u> (and associated <u>Supplementary Guidance</u>) of the existing Local Development Plan (LDP) adequately address this issue?
✓ Yes
□ No
☐ Don't know
If no, tell us what change you would like to see, and why?
HEALTHIER LIVES 5. 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?
Yes Yes
✓ No □ Don't know
If yes, please tell us what change you would like to see and why?

BUSINESS, TOURISM AND LESIURE 6. Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and businesses?
✓ Yes
□ No
☐ Don't know
If no, please tell us what you consider should change and why?
7. Do the existing LDP policies (ED1-5) adequately encourage new employment sites and businesses?
✓ Yes
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CITY AND TOWN CENTRES 8. 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?
✓ Yes
□ No
☐ Don't know
If no please tell us for which town(s) and why you consider this to be the case.

9. Do policies <u>RD1-6</u> provide a satisfactory framework for consideration of residential development within Perth Kinross?	. &
Yes	
✓ No	
☐ Don't know	

Balmanno Farm is of the view the current Policy RD3: Housing in the Countryside and the accompanying supplementary planning guidance, Housing in the Countryside (November 2012) represent an overly restrictive approach to new

residential developments in the countryside.

Please give your reason(s) for your answer.

RESIDENTIAL DEVELOPMENT

Balmanno Farm agree that the majority of new housing, and in particular larger scale housing developments, should be focused within/on the edge of existing settlements. However, they are of the view that small scale residential development within the open countryside can provide a valuable contribution to the housing stock of Perth & Kinross, whilst at the same time allowing farmers to raise funds to reinvest in core agricultural operations.

At Balmanno Farm, there are a number of disused houses and steadings, which would benefit from restoration or replacement. Current planning policy is supportive of the redevelopment of such buildings, under Policy RD3 and Categories 4 and 5 of the HITC guidance. Balmanno Farm is therefore supportive of the retention of these policies, in order to allow the continued restoration or replacement of redundant buildings, and the environmental improvement such development brings.

However, Balmanno Farm would also support the introduction of a further criterion within Policy RD3 and the HITC guidance, allowing the development of houses on non-productive agricultural ground within existing farms.

At present, Balmanno Farm, in common with farms across Perthshire, has a number of areas of ground, adjacent to existing properties, where agricultural operations no longer take place. An example would be a corner of a field, where modern agricultural machinery cannot operate. The re-use of sites such as this for residential devleopment would not comply with the existing criteria (a) and (b) of Policy RD3 (criteria 1 and 2 in the HITC guidance), as they are not 'definable sites formed by existing topography and or well established landscape features'. Sites such as this are common to farms across Perth & Kinross.

These sites could readily accommodate single houses, and could be blended into the local landscape through sensitive building design and landscaping. Furthermore, the ability of an agricultural enterprise to dispose of such sites, which are of not agricultural value, would allow them to reinvest in the core farming business.

The attached sketch demonstrates the type of sites in question, which would most likely not comply with current planning policy in Perth & Kinross. Sites such as these could, subject to a modification to existing housing in the countryside policies, make a valuable contribution to local housing stock while having a minimal impact on landscape character and the amenity of neighbouring uses.

Such an approach would be supported under Scottish Planning Policy due to its assumption in favour of development that leads to sustainable development. A proposed change in the housing in the countryside policy would allow only small areas of non-productive agricultural land to be used for small-scale housing proposals, which would represent a sustainable approach to farm diversification and rural housing policy.

LOW CARBON TRAVEL, HEAT AND POWER 10. 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 policy <u>ER1</u> , Transport policy <u>TA1</u> and Climate Change, Carbon Reduction and Sustainable Construction policy <u>EP1</u> of the existing LDP need updating to enable Perth & Kinross Council to fulfill its obligations in this respect?
☐ Yes ☐ No
✓ Don't know
If yes, please tell us what changes you consider would be appropriate and why?
RESOURCE SECURITY 11. Existing policy <u>ER3</u> 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?
12. Are other Natural Resources adequately protected by the LDP Policies (ER3)?
✓ Yes
□ No □ To a series of the ser
Don't know
If no, explain what aspects of the policy you consider should be altered and why?

GREEN/BLUE NETWORKS

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biodiversity, e.g. Being utilised for travel to work (such as a footpath network), for leisure (e.g. parkland, woodland, sea-shore) or perhaps providing a habitat for important species.
13. Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately protect and promote green and blue networks?
✓ Yes
□ No
☐ Don't know
If you answered no, please help us by explaining how they should be changed, and your reason(s).
OTHER ISSUES 14. Have we missed any land use planning issue which you consider the revised LDP2 should cover?
☐ Yes
── ✓ No
☐ Don't know
If yes, please detail below, and give reasons for your suggestion(s).
The year of the second for your orange of the year or
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□ No
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If no, please detail how you think the balance should change &/or which topic areas should be included/excluded, together with your reason(s).

PART 3 DECLARATIONS

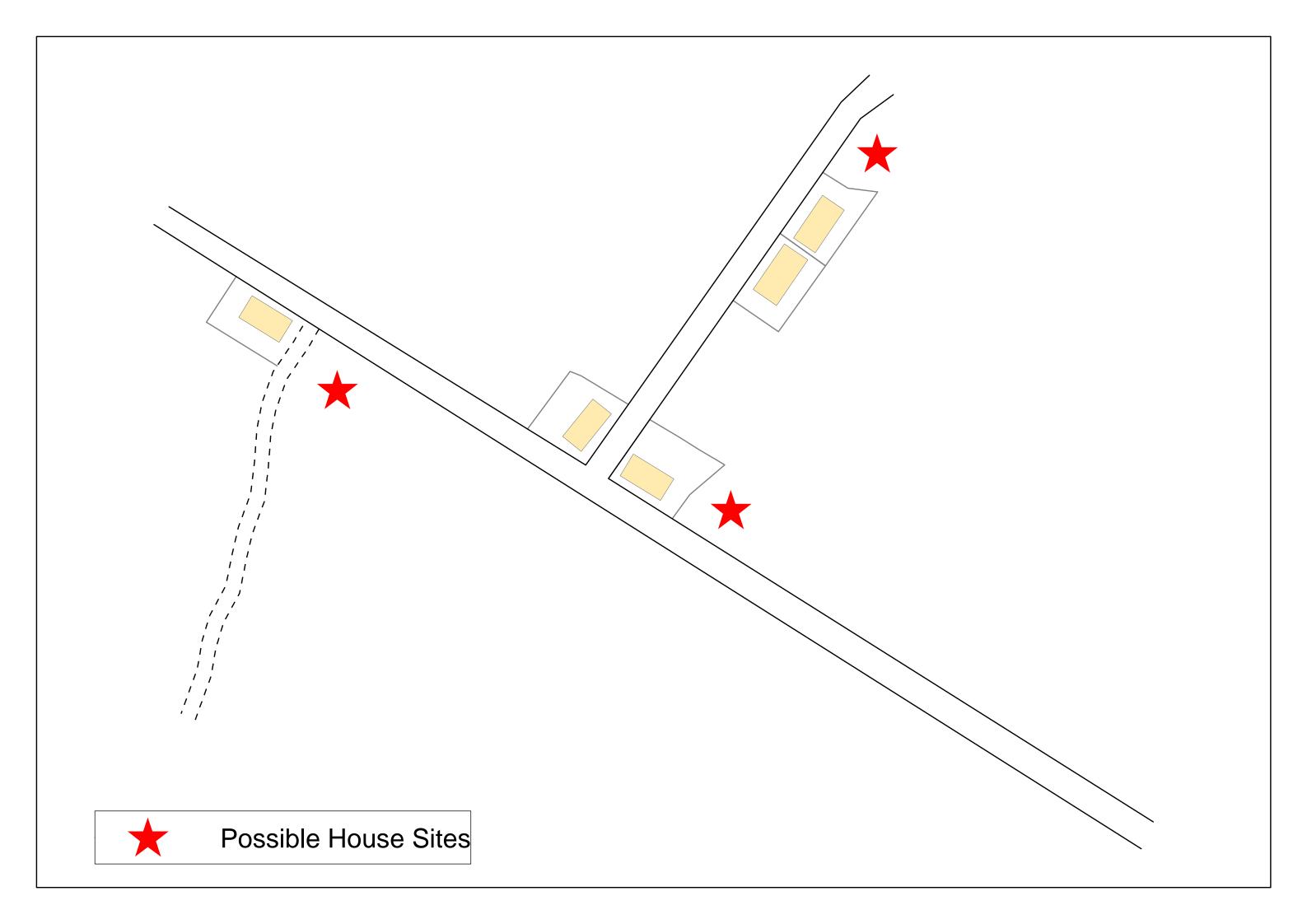
	letails of these issues may be publicised as part of consultation on this and future phases Local Development Plan.
Signature	
Development Plan. I her	eby confirm that the information given in this form is true and accurate to the best of my c submissions, please confirm your statement by ticking the box instead of providing
Signature:	Robert Patrick
Name:	Robert Patrick
Date:	31/3/15
-	ta Protection Act. pout the call for sites process? optional question.
Councils website	
Notice in Newspaper, co	uld you tell us which one below?
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Agent

You

Perth and Kinross Local Development Plan

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20 January - 31 March 2015

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Company	Company
Building No./Name	Building No./Name
Address	Address
Town/City	Town/ City
Postcode	Postcode
Telephone	Telephone
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Email	Email
3. Who is the main contact for this submission?	

PART 2 IDENTIFYING ISSUES

CLIMATE CHANGE

4. 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 <u>EP1</u> & <u>EP2</u> (and associated <u>Supplementary Guida</u>	<u>ınce</u>)
of the existing Local Development Plan (LDP) adequately address this issue?	

Yes
No
Don't know

If no, tell us what change you would like to see, and why?

HEALTHIER LIVES

5. 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 <u>Green Infrastructure</u>) need improving?

Yes

No

Don't know

If yes, please tell us what change you would like to see and why?

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Yes
No
Don't know
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Don't know
If no, please tell us what you consider should change and why?
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Yes
No

Don't know

If no please tell us for which town(s) and why you consider this to be the case.

RESIDENTIAL DEVELOPMENT 9. Do policies RD1-6 provide a satisfactory framework for consideration of residential development within Perth & Kinross?
Yes
No
Don't know
Please give your reason(s) for your answer.
LOW CARBON TRAVEL, HEAT AND POWER 10. 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 policy ER1, Transport policy TA1 and Climate Change, Carbon Reduction and Sustainable Construction policy EP1 of the existing LDP need updating to enable Perth & Kinross Council to fulfill its obligations in this respect?
Yes
No
Don't know
If yes, please tell us what changes you consider would be appropriate and why?
RESOURCE SECURITY 11. Existing policy <u>ER3</u> 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?

12. Are other Natural Resources adequately protected by the LDP Policies (ER3)?
Yes
No
Don't know
If no, explain what aspects of the policy you consider should be altered and why?
GREEN/BLUE NETWORKS
Green/Blue spaces and networks include any area of open space whether public or private; gardens, parks, woodlands and hedgerows. These are all important. It also includes water systems such as rivers, lakes and ponds, and the coastline. Networks refer to the interlinking of these spaces and features all of which have a host of benefits, for both people and biodiversity, e.g. Being utilised for travel to work (such as a footpath network), for leisure (e.g. parkland, woodland, sea-shore or perhaps providing a habitat for important species.
13. Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately protect and promote green and blue networks?
Yes
No
Don't know
If you answered no, please help us by explaining how they should be changed, and your reason(s).
OTHER ISSUES 14. Have we missed any land use planning issue which you consider the revised LDP2 should cover?
Yes
No
Don't know

If yes, please detail below, and give reasons for your suggestion(s).
SUPPLEMENTARY GUIDANCE 15. Does the existing LDP have the right balance between Policies and Supplementary Guidance (SG), and does the SG cover the right topic areas?
Yes
No
Don't know
If no, please detail how you think the balance should change &/or which topic areas should be included/excluded, togethe with your reason(s).
PART 3 DECLARATIONS
I /the agent accept that details of these issues may be publicised as part of consultation on this and future phases of the preparation of the Local Development Plan.
Signature
I/ the agent certify that this is a submission for the Call for Issues process as part of Perth and Kinross Local Development Plan. I hereby confirm that the information given in this form is true and accurate to the best of my knowledge (for electronic submissions, please confirm your statement by ticking the box instead of providing signature).
Signature:
Name:
Date:
Any personal data that you have been asked to provide on this form will be held and processed in accordance with the requirements of the 1998 Data Protection Act.

36. How did you find out about the call for sites process? optional question.

Councils website

Notice in Newspaper, could you tell us which one below?

PKC Development Plan Scheme

Telephone enquiry to Council

Email enquiry to Council

Social Media (e.g. Twitter, Facebook)

Other, could you tell us how below?

Further information

Completed Submission forms and location plans should be addressed to developmentplan@pkc.gov.uk

Or alternatively by post to:

Local Development Plan Team Perth and Kinross Council Pullar House 35 Kinnoull Street Perth PH1 5GD

The Call for Issues process will run from Tuesday 20 January 2015 for 10 weeks. Completed Submissions must be received by Tuesday 31 March 2015.



Perth and Kinross Local Development Plan

Call for Issues

20 January - 31 March 2015

This form should be used to make a submission to the call for issues process to raise awareness of an issue for consideration in the review of the Perth and Kinross Local Development Plan. Requested information should be concise and to the point.

For help completing this form you are advised to read the associated **Guidance notes** or ring us on 01738 475300

PART 1 APPLICANT AND SITE DETAILS

1. Agents Details (if any)		2. Your details		
Name	Debbie Mackay	Name		
Company	Smiths Gore	Company	Scone Estate	
Building No./Name	22	Building No./Name		
Address	Young Street	Address		
Town/City	Edinburgh	Town/ City		
Postcode	EH2 4JB	Postcode		
Telephone	0131 344 0891	Telephone		
Mobile		Mobile		
Email	debbie.mackay@smithsgore.co.	Email		
3. Who is the main contact for this submission?				
Agent You				

PART 2 IDENTIFYING ISSUES

CLIMATE CHANGE 4. 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 <u>EP1</u> & <u>EP2</u> (and associated <u>Supplementary Guidance</u>) of the existing Local Development Plan (LDP) adequately address this issue?
Yes
✓ No
☐ Don't know
If no, tell us what change you would like to see, and why?
Renewable energy offers a key opportunity to tackle climate change and the recent interest in ground-mounted solar PV sites in Scotland provides a low impact, reversible and highly effective way to contribute a substantial amount of such energy. The current plan lacks any specific policies in relation to solar PV and its green belt policy contains no guidance as to the acceptability of otherwise of renewable energy schemes in the green belt. Under Scone's response to questions 10 Low Carbon Heat and Power and question 13 Green/Blue Networks, the opportunities which renewable energy in general and solar PV in particular offer to provide no-carbon heat and power and the way in which the green belt policy at present is not clear as to its support for such technologies are highlighted.
HEALTHIER LIVES 5. 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?
Yes
✓ No
☐ Don't know
If yes, please tell us what change you would like to see and why?
As stated elsewhere in Scone's response to the Call for Issues, a greater emphasis on support for tourism and leisure will have the effect of creating infrastructure which is good for both residents and visitors and which can be both capable of use for recreation and for sustainable and healthy travel. An emphasis and planning support for facilities which use the area's resources to provide local healthy produce will also assist in supporting health and wellbeing.

6. Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and businesses? Yes No Don't know

If no, please tell us what you consider should change and why?

BUSINESS, TOURISM AND LESIURE

Some issues in relation to the current LDP policies are raised below. As a general point, the plan as a whole and these policies in particular, do not give particularly strong statements of support to Perth and Kinross's tourism industry.

Paragraph 94 of SPP states that 'Plans should align with relevant local economic strategies. These will help planning authorities to meet the needs and opportunities of indigenous firms and inward investors, recognising the potential of key sectors for Scotland with particular opportunities for growth, including: (among others) food and drink.' The National Planning Framework 3 states that 'Rural Scotland provides significant opportunities for tourism, outdoor sports and recreation, as reflected in VisitScotland's National Tourism Development Framework, which development plans and planning decisions should support' (para 4.27). Paragraph 100 of SPP aligns with this position in stating that 'Development Plans should be informed by the Tourism Development Framework for Scotland in order to maximise the sustainable growth of regional and local visitor economies. '

The Tourism Development Framework for Scotland is therefore a significant document to be considered when framing appropriate policies to support this sector. Paragraph 2.86 of the Development Framework notes that 'Our produce has enabled a speciality retail market to be developed across Scotland located in our popular tourist destinations. There is scope to continue to further develop speciality retailing as part of the infrastructure of the visitor economy.' Further, the document goes on to state at paragraph 2.87 that 'Visitor research by VisitScotland in 2011/12 highlights that, along with accommodation, visitors felt that improvement of the quality of their food experience in Scotland improves their overall visitor experience. The importance of food as part of the visitor experience will continue to grow in significance as visitors are exposed to a greater variety of high quality produce.'

In the context of Tourism's important role in the Perth and Kinross economy as recognised at paragraph 3.3.6 of the current Adopted LDP, and of the high quality specialist produce from the Perth and Kinross area, we consider that opportunities to promote the region's indigenous food and drink sector as part of the overall tourism offer should be capitalised upon and supported through the Local Development Plan.

In relation to policy ED1A (d) Retail uses in employment areas, some increased clarity could be helpful. It is not clear whether this policy is purely relating to employment areas as allocated in the plan, or to any existing and proposed employment areas. Areas identified for employment uses" could be more carefully defined.

Criteria (d) should be altered to allow flexibility in relation to appropriate retail opportunities for example; there may be a good reason to have a retail outlet which is contributing to e.g. the tourism offer within an employment area such as a craft workshop cluster. These should not be unreasonably restrained.

In relation to policy ED1B employment uses in Mixed Use Areas, the list of uses allowed within mixed use areas should include an element of retailing. It is important to provide sufficient retail outlets close to where people live to reduce the need to travel. This can be managed carefully to avoid impact on existing centres.

Regarding policy ED3: Rural Business & Diversification This policy could be altered as follows;

Paragraph 94 of SPP highlights the particular opportunity for growth in relation to tourism and the food and drink sector and the need for Development Plans to align with local economic strategies in order to help planning authorities to meet the needs and opportunities of indigenous firms and inward investors in such key sectors. Paragraph 100 also states that "Development Plans should be informed by the Tourism Development Framework for Scotland in order to maximise the sustainable growth of regional and local visitor economies".

It is acknowledged that support for retailing must balance the need to sustain existing retail centres with the need to increase choice and diversification of the general retail sector. Accordingly we consider that Farm shops, which by their more specialist, visitor-orientated nature will not adversely impact on the convenience retail offer of adjacent settlements should be supported more explicitly in policy. They are rarely offering any kind of competition to existing centres whose retail offer is of a very different nature. It is vital that the LDP is in line with the requirements of the economic policies in SPP.

Policy ED3 could explicitly provide support for destination, niche retailing of a range of sizes from the House of Bruar experience to more local farm shops. Such retailing outlets frequently offer a specific visitor experience or are complementary to, and an intrinsic part of, other visitor attractions. We therefore propose that policy ED3 be amended to offer such support by stating the following:

"The Council will give favourable consideration to the expansion of existing businesses and the creation of new ones in rural areas. There is a preference that this will generally be within or adjacent to existing settlements. Although sites outside settlements may be acceptable where they offer opportunities to diversify an existing business, or are related to a site specific resource, local produce or other site specific opportunity. This is provided that they will contribute to the local economy through the provision of permanent employment, or visitor accommodation, or additional tourism or recreational facilities, including farm shops or involve the re-use of existing buildings".

And in relation to the criteria used in this policy,

"All proposals will be expected to meet all the following criteria: (a-e and g, as existing)

Criteria (f) should be changed to state: "Outwith settlement centres, retailing will only be acceptable if it can be demonstrated that it is either, ancillary to the main use of the site and would not be deemed to prejudice the vitality of

existing retail centres in adjacent settlements, or is providing a niche, destination, retailing experience which supports the tourism/visitor offer of Perth and Kinross.

The third paragraph of Policy ED3 deals with "proposals whose viability requires some mainstream residential development" but refers to "where this fits with the Plan's policies". It is not clear what is meant by this and to which housing policies they are referring. Therefore the policy position is unclear. Housing of this type has a key role to play in either ensuring a business can function by providing a necessary on-site presence, or by providing a source of capital which can support the viability of rural businesses. There should therefore be positive support for such proposals and this policy should be more explicit in its support.

If no please tell us for which town(s) and why you consider this to be the case.

While the importance of supporting vibrant city and town centres is well recognised, there is a danger that these policies could be misapplied. Policy RC4 does not allow for niche retail opportunities which present no threat to the functioning of existing centres because their offer is specific to the tourism/visitor market and/or they are required to support an existing or proposed rural or tourism business. This additional statement mentioned below is designed to enable the policy to provide for specific situations where a retail offer is critical to the viability of the wider business or creates an attraction which supports the overall tourism offer of Perthshire.

The SPP requires Planning Authorities to adhere to the sequential approach when dealing with applications for retail outlets. Paragraph 66 states that; "Planning Authorities, developers, owners and occupiers should be flexible and realistic in applying the sequential approach to ensure that different uses are developed in the most appropriate locations".

Therefore RC4: Retail & Commercial Leisure Proposals paragraph 4, which begins "Proposals on edge of centre or out of centre locations will only be acceptable where.." could be adapted to continue " they offer a type of niche, destination retail which supports the tourism/visitor offer of Perth and Kinross and an out-of-centre location is required because of its specific locational significance to the proposal or because the proposal is in connection with an existing or proposed rural or tourism business".

9. Do policies RD1-6 provide a satisfactory framework for consideration of residential development within Perth & Kinross? Yes No Don't know

Please give your reason(s) for your answer.

In this section, Scone comments on the following aspects of residential development policies in the LDP

• Housing in the Countryside

RESIDENTIAL DEVELOPMENT

- Affordable Housing
- Particular Needs Housing
- Spatial Strategy for small settlements

Specific Sites are listed in "Call for Sites" documents which are submitted separately but where there are wider considerations regarding the sites which make up the allocated land supply in the current LDP comments are also included in this Call for Issues document as follows:.

Area of White Land to East of Scone Village

The current plan withholds the green belt from an area of "white land" to the east of Scone Village. This appears to indicate the Planning Authority's intentions for future longer term development at Scone village. Scone Estate is of the view that this is not necessarily the best location for longer term development and that alternative options should be considered. The land to the east would almost certainly have to drain into the Annaty Burn and Barrell drain which could exacerbate existing problems with run-off in Scone. A more strategic look at the long term development of Scone should be undertaken and alternative areas of growth considered as part of that process.

Housing in the Countryside

The main aspect of current residential development policies which could be improved is in relation to policy RD3: Housing in the Countryside particularly as it pertains to the Green Belt.

The Statement in Policy RD3 "This policy does not apply in the Green Belt" should be either removed or should be changed to state the following;

"This policy does not apply in the Green belt except where it fits with the Scone Palace and Estate Masterplan, Supplementary Planning Guidance".

Policy RD3: Housing in the Countryside, and its accompanying Supplementary Guidance provides a useful and positive interpretation of Scottish Planning Policy in relation to rural development and rural housing. However, excluding this very useful policy from the green belt is considered unnecessary and counter-productive. The policies provide a limited number of useful opportunities to (as the policy states) "encourage sustainable development in rural areas" and "safeguard the character of the countryside; support the viability of communities; meet development needs in appropriate locations; and ensure that high standards of siting and design are achieved". It is our view that all of these objectives are just as applicable to the green belt as they are to the wider Perth countryside.

The withdrawal of this policy from the proposed green belt area removes key opportunities to enhance the area covered. The policy creates limited but useful scope for new build in rural areas in very restricted situations. The impact on the green belt of this policy would be minimal and its embargo makes an already restrictive policy even more inflexible. Categories (1) and (2) of policy RD3 provide some scope for infill within existing small building groups. The restrictions applied in the policy are such that this type of development can be strictly controlled. There is therefore no necessity to exclude these aspects of the policy from the green belt.

Category (3) New Houses in the Open Countryside provides limited opportunities which again should not create any particular issues for the green belt. By their very nature the "Existing Gardens" criteria 3.1 (a), suggests an existing suitable setting for a house and restricts it to situations where "development would not fundamentally affect the qualities and integrity of the site." This restriction combined with the "All Proposals" criteria and the "Siting" criteria in the policy should easily be sufficient to provide the necessary quality of proposals to protect the setting of Perth.

The "Walled Garden" category (3.1 (b) by its very nature will have no impact on the wider landscape as development will be contained within high walls. Indeed it is completely contrary to afford this opportunity to assist in the preservation of the walls of such gardens out with the green belt while not allowing this opportunity within the green belt.

Category 3.2 deals with the relocation of houses away from Flood Risk areas. Given that so much of the Green belt adjoins the Tay river valley, and may be affected by flood risk, it would seem contrary not to allow this aspect of the policy to apply

Category 3.3 deals with houses required in relation to economic activities. It again appears contrary to the need for sustainable rural development to refuse to allow scope for such proposals in the area around Perth covered by the green belt. Many new rural businesses are more likely to thrive if they are in location close to centres of population. The green belt designation (based on the restrictions on economic activities and on accompany housing in the green belt policy) pushes such business opportunities out with Perth's immediate hinterland therefore reduces the opportunity for

shorter travel distances and ease of access to a key market place.

Category 3.5 Pilot projects creating eco-friendly houses is an attractive and forward-thinking policy which it is unfortunate to loose from the area covered by the green belt. However, it is less critical a loss than other categories. Category 4 Renovation or replacement of houses including vacant or abandoned houses is an important positive policy which can assist in making the countryside more attractive and creates a careful use of existing resources by bringing abandoned houses into use. Again it seems illogical not to allow this policy in the rural hinterland of Perth. While aspects of category 5 Conversion are allowed under the green belt policy, the "replacement of redundant non-

domestic buildings does not appear to be acceptable. This does not make sense in respect of the stated objectives of the green belt designation – "to preserve the setting, views and special character of Perth". Such buildings may be in a ruinous condition and past the ability to be repaired but may offer a suitable location for redevelopment. The existence of ruinous buildings in the hinterland of Perth will not enhance the city's setting. The green belt designation in its current form therefore works actively against the environmental improvement of the setting of Perth,

Category 6, Rural Brownfield Land is geared towards removing dereliction and gaining a significant environmental improvement on sites formerly occupied by buildings by allowing a small-scale development of up to 5 houses. The removal of this policy in the green belt, therefore removes the opportunity to achieve this environmental improvement and improve the setting of Perth.

In summary, the removal of the Housing in the Countryside policy from the area covered by green belt, also removes a number of opportunities to achieve environmental improvement of the area and to support a range of rural development and economic opportunities in many locations which by their proximity to Perth are highly sustainable.

RD4 Affordable Housing

In relation to policy RD4 Affordable Housing we would wish to see the removal of the phrase "including conversions". This is based on the fact that conversions of traditional buildings are particularly difficult and expensive to undertake. Conversion to housing is a good way to ensure a future for many traditional and historic buildings that are otherwise redundant for their original use and not suited to modern needs. Therefore it is not wise to add further to the cost of conversion of these valued properties by requiring affordable housing provision as part of any development. Scone Palace has a number of historic traditional farm steadings on the Estate which would lend themselves to conversion to housing but will be expensive projects to undertake. Additional costs such as contributions to affordable housing will make these projects potentially unviable resulting in these buildings remaining unused and gradually deteriorating to the point where they could be lost.

Scone would however be very interested in working with the council to find other suitable sites for affordable housing.

Policy RD6: Particular Needs Housing Accommodation

Policy RD6: Particular Needs Housing Accommodation could be broadened to include retirement villages. The needs of an aging population must be met in a range of innovative ways. There is scope for Perthshire to provide support for retirement villages which could bring wealthy retired people into the area who would also contribute to the local economy by using local facilities.

An additional criterion could be added to the Policy as follows;

"The Council will support proposals for particular needs housing and accommodation which fall into one or more of the following categories:"

"(c) Retirement villages."

Spatial Strategy 4.2.1 and 4.2.2 Re Small Settlements

In order to provide most effectively for residential development other aspects of the current plan other than policies RD1-6 also need to be addressed.

The Spatial Strategy should clarify that the smaller settlements which are not listed in the three tier hierarchy of settlements can now be considered as Building Groups under the Housing In the Countryside Policy. Scone objected on this basis to the Proposed Plan of LDP1 and the Council their response in the relevant Schedule 4 document, while not agreeing to make any changes to the text of the LDP, did clarify their view that "such settlements would be assessed against Policy RD3: Housing in the Countryside". Discussions with the Council have made it clear that this is the correct interpretation. We are still of the view that the language in the LDP could be changed to clarify this point

There are a range of small settlements within Scone Estate which lend themselves to small amounts of incremental growth in line with the Housing in the Countryside policy. The release of small numbers of plots for individual houses in these settlements can provide a source of capital for the Estate to invest in the enterprises required to sustain the Palace and grounds as viable visitor attractions. The smaller settlements in more remote parts of Perthshire require some level of growth in order to sustain local services and provide accommodation for local people. The SPP supports this type of growth.

The current LDP does not deal with these settlements and therefore a policy vacuum exists. Clarification is required. Paragraph 4.2.2 is unclear. Does it mean that the Plan restricts growth to no houses or that the numbers will be limited? The new LDP presents an opportunity to make it clear that small settlements such as those named can be considered housing clusters under the Housing in the Countryside policy.

LOW CARBON TRAVEL, HEAT AND POWER

10. 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 policy <u>ER1</u> , Transport
policy TA1 and Climate Change, Carbon Reduction and Sustainable Construction policy EP1 of the existing LDP
need updating to enable Perth & Kinross Council to fulfill its obligations in this respect?

☐ Yes

No
Don't know

If yes, please tell us what changes you consider would be appropriate and why?

Cross Tay Link Road Wider Impact Opportunities

In the light of the CTLR and its potential impact on land to the east of the Tay, the Council should consider directing and prioritising revenue transport budgets to achieve enhancement of the wider roads infrastructure in this area. Improvements to the Stormontfield Road, the A93 and the A94 will all encourage the use of the CTLR when it is in place. The council should also take a strategic look at what the new route will open up in this area and how that might influence development in the longer term. Clearly the CTLR when implemented will change the character and function of this area significantly and plans should be made to maximise the benefits of this route.

Renewable Energy

Renewable energy offers a key opportunity to tackle climate change and the recent interest in ground-mounted solar PV sites in Scotland provides a low impact, reversible and highly effective way to contribute a substantial amount of such energy. The current LDP lacks any specific policies in relation to solar PV and its green belt policy contains no guidance as to the acceptability of otherwise of renewable energy schemes in the green belt. Under Scone's response to questions 4 Climate Change and question 13 Green/Blue Networks, the opportunities which renewable energy in general and solar PV in particular offer to provide no-carbon heat and power and the way in which the green belt policy at present is not clear as to its support for such technologies are highlighted.

Scottish Planning Policy states at paragraph 52 that:

'Local development plans should describe the types and scales of development which would be appropriate within a green belt. These may include......'

While renewable energy proposals are not included in the list, the tone of paragraph 52 indicates that the options that follow are not exhaustive. This is particularly relevant with regard to renewable energy proposals, as such developments continually evolve, and have the ability over-time to incorporate technologies that may have been commercially unviable only a few years ago.

Paragraph 5.1.3 of the Adopted LDP echoes TAYplan in stating that the purpose of the greenbelt is to: manage longterm growth, and preserve the setting, views and special character of Perth and the separate identity of Scone. Paragraph 5.1.4 of the Adopted LDP states (among other things) that the objectives of green belt policy include: controlling the spread of built development, and facilitating the creation of green corridors with improved biodiversity. The National Planning Framework 3 (paragraph 4.7) states that 'We have long sought to protect Scotland's environment, recognising that it is a dynamic resource rather than a fixed asset. To better reflect this, more proactive and innovative environmental stewardship is required.' The document further goes on to state (paragraph 4.12) that 'We are committed to reversing the decline of some habitats and species and regulating environmental pollution.' In the case of well sited ground mounted solar PV arrays, there are opportunities for such developments to be permitted within the green belt in accordance with SPP, NPF3 and the objectives and Strategy of the Adopted Local Development Plan. Well-sited Solar PV developments offer opportunities to establish habitat beneath the arrays, while the modules themselves remain hidden from public views. As these developments are both temporary and removable, they do not leave any brownfield legacy encouraging future built development on these temporary sites. By contrast, through careful landscape management, habitat can become established during the period when the development quietly generates low-impact renewable energy. Once removed, such enhanced habitat will make a positive contribution to the green belt, and the location of any such evolving habitat can be taken into account when long-term planning of the wider green network is undertaken.

Enhancement of local wildlife and improvements to biodiversity can be designed into such projects through the introduction of wide ecological corridors, bird boxes and bug hotels, and through the retention of field boundaries such as hedgerows. Furthermore, grass and wildflower mix can be introduced between the rows of panels to encourage further biodiversity enhancements, or such land can continue to stay in agricultural use throughout the period the modules are installed in the form of animal grazing beneath the modules.

In relation to policy NE5 therefore it is considered that there are opportunities within the green belt where appropriate forms of renewable energy can be developed now and in the future, which would accord with the objectives of the green belt, and help accelerate improvements to biodiversity therein. As presently drafted, there is no explicit policy support for such development, even when it can be demonstrated that this would support the objectives of the green belt in all other regards. It would therefore be helpful for appropriate forms of renewable energy development to be added as a further qualifying criterion under policy NE5. The following wording is proposed to follow criterion (c):

(d) 'It constitutes uses which advance the Council's Local Development Plan Strategy in support of the development of renewable and low carbon energy, where these can be designed in such a way that biodiversity will be enhanced and/or agricultural uses will continue to take place. Any such proposals shall demonstrate that they accord with the overriding objectives of the green belt, and are appropriate to the character of the green belt.'

RESOURCE SECURITY

11. Existing policy <u>ER3</u> 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?

No Comment.
12. Are other Natural Resources adequately protected by the LDP Policies (ER3)?
☐ Yes
▼ No
Don't know
If no, explain what aspects of the policy you consider should be altered and why?
ER5: Prime Agricultural Land
The MacAuley Land Use Classification maps are the main source of information on prime agricultural land across Scotland.
However, they are unavoidably, quite broad-brush and it may be necessary on occasion to conduct a more detailed investigation into the land concerned, if it is needed for development, in order to ascertain whether the specific area under
consideration, is in fact "prime". Therefore it would be helpful to have the following statement in the plan:
" If detailed studies show that the land is in fact not prime agricultural land, this policy will not apply."
GREEN/BLUE NETWORKS
Green/Blue spaces and networks include any area of open space whether public or private; gardens, parks, woodlands and
hedgerows. These are all important. It also includes water systems such as rivers, lakes and ponds, and the coastline.
Networks refer to the interlinking of these spaces and features all of which have a host of benefits, for both people and biodiversity, e.g. Being utilised for travel to work (such as a footpath network), for leisure (e.g. parkland, woodland, sea-shore)
or perhaps providing a habitat for important species.
13. Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately protect and
promote green and blue networks?
∐ Yes
✓ No
Don't know
If you answered no, please help us by explaining how they should be changed, and your reason(s).
CF1B Open Space within New Developments
The request for contributions to existing open space, must be based on the tests in circular 3/2012 and only be requested where the development will create additional pressure on existing infrastructure. Therefore the phrase in this
policy: "In areas where there is an adequate quantity of accessible open space in a locality, a financial contribution
towards improvement or management of existing open space may be considered an acceptable alternative" should hav the phase below added to it;
"If it is required".
NE4: Green Infrastructure The policy should include "rural enterprises" in the list of uses in criteria (c) so that the policy states;

"Development will contribute to the creation, protection, enhancement and management of green infrastructure by the;(c) Protection of the countryside from inappropriate development whilst supporting its positive use for agriculture, recreation, biodiversity, health, education, tourism, and rural enterprises."

It is vital that the LDP provides support for rural enterprises and removes any unnecessary planning barriers. The countryside should not been seen merely as a playground to be protected but as a vital living area that requires many levels of activity in order to remain sustainable on all levels.

NE5 Green Belt

Scone Estate remains convinced that the Green belt designation is an unhelpful and unwieldy designation. In its objections to the Proposed Plan for LDP1, Scone Estate promoted 4 options for the treatment of the green belt proposal

with preferences for either option 1 or Option 4. These included:

Option 1: Complete Removal of Proposed Green belt Designation

Option 2: Alterations to the Green belt Boundaries in certain locations:

- 2.1 Completely withdrawn from the Scone Palace Designed Landscape
- 2.2 Withdrawn from a site to the west of North Scone.
- 2.3 Withdrawn from the site known as Pickstonhill to the south of Scone
- 2.4 Withdrawn from the area to the east of Pitcairngreen

Option3: Alterations to the green belt policy wording to state that development will only be permitted where:

- 3.1 it provides a new business opportunity or supports an existing one, or,
- 3.2 it utilises and regenerates a rural brownfield site
- 3.3 it fits within the landscape in a way which does not detrimentally affect the setting of Perth.
- 3.4 Fits within the following selected Housing in the Countryside Policy criteria;
- Building Groups
- Infill Sites
- New Houses: in existing walled gardens; relocated from an area of flood risk; or needed in relation to an economic activity
- Renovation or replacement of houses
- Conversion or replacement of redundant non-domestic buildings
- Rural Brownfield Land.

Option 4: Scone Palace and Estate Masterplan Supplementary Guidance

A further and preferred option was for the LDP to create a special designation for Scone Palace and Estate which explicitly supports the Masterplan as a management tool for the long term protection, enhancement and financial and environmental sustainability of the national resource. This approach would involve the creation of a specific Scone Palace and Estate Masterplan, Supplementary Guidance document which would be developed in full participation with Perth and Kinross Council, other key stakeholders and in consultation with the community. This document would set out a clear agenda for the protection of the key attributes of the Palace and Estate, including its contribution to the setting of Perth, while planning carefully for vital new enterprises and development critical to the long term sustainability of the Palace and Estate.

In the objection to the Proposed Plan, Scone set out a Strategic Appraisal of the Green belt and Landscape Policies. While Perth and Kinross Council agreed with a number of the matters raised and stated their willingness to allow certain changes in the Schedule 4 documents, the Reporter did not pick up on these opportunities. Scone would therefore wish to reiterate its concerns about this policy and to this end has included the following statement in response to the Call for Sites.

Green Belt Area

The proposed Perth green belt inner boundary forms a tight edge to the city around the south and east of Perth. To the west it expands beyond the city edge as far west as Huntingtower, and to the north beyond Bertha Loch. The outer boundary extends to form a "green belt" of between 2 and 8 km around the city area. The settlements of Pitcairngreen, Cromwellpark, Bridgend and Gannochy, and Walnut Grove are specifically excluded but the green belt is drawn tightly around their urban limits. Scone is also excluded but with the green belt drawn beyond the urban limit to the east and north to allow for future growth. The green belt contains a wide variety of landscape types from the wooded hills of Kinoull and Deuchny to the east, the lowland Firth landscape around the Tay, the policy landscapes close to Scone and the Lowland Hills to the west.

Green Belt policy

Key statements in SPP in relation to Green Belts are as follows:

- "49. For most settlements, a green belt is not necessary as other policies can provide an appropriate basis for directing development to the right locations".
- 50. In developing the spatial strategy, planning authorities should....where necessary, review the boundaries of any green belt.
- 51. Local development plans should show the detailed boundary of any green belt, giving consideration to:
- the need for development in smaller settlements within the green belt, where appropriate leaving room for expansion; 2. TAYplan

The role of the Green belt, in TAYplan, is seen as

- Preserving the setting, views and special character of Perth: including the historic core
- To assist in safeguarding the countryside from encroachment
- To manage long term planned growth including infrastructure
- Define appropriate forms of development within the Green belt based on the SPP
- The Perth Green belt should sustain the identity of Scone and provide land for planned development around key villages and settlements
- 3. Perth and Kinross LDP

Green belt policy within the proposed LDP is contained within Chapter 3.9, the Natural Environment, and is Policy NE5 follows closely SPP while stating in addition: .

- Housing in the Countryside Policy does not apply
- The Council will prepare SPG in partnership with landowners and others that forms a management plan for the Green belt with the aim if developing:
- o A sustainable rural economy
- o Increased recreational use
- o Landscape enhancement
- o Improved path networks
- o Green network linkages

Scone supports the Approach of developing Supplementary Guidance for the Green belt and its aims but considered that the current policy does not provide what is needed for a sustainable rural economy.

The Perth Green Belt Study 2000 and Perth Capacity Study 2001 were both prepared by David Tyldesley Associates on behalf of SNH and Perth and Kinross Council and informed the identification of the green belt boundary as defined within the LDP.

The Green Belt Study was written nearly 15 years ago. At that time that this study was written, Perth had no Green belt but was surrounded by an Area of Great Landscape Value making up the gaps left by the Historic and Designed Landscapes (including Scone Palace) which lie within proximity of the city and were not included within the AGLV. The consultants then established seven criterions to justify whether a Green belt is required around Perth all of which support the establishment of the Green belt except for the role in ensuring the new development is directed to brownfield land rather than green, on the basis that Perth has little brownfield land.

The study then concludes that the supporting document "Perth Landscape Capacity Study" 2001 provides a clear basis for drawing the Green belt boundary. Points of note in the study in relation to Scone are summarised in the table below. Section reference Points of Note

- 5.3 Within "Boundaries" "Towns and villages within Green Belts should be given scope to develop via infilling, the use of derelict or unused land and development of peripheral land, again where there would be no harm to Green belt objectives"
- 6.2 Within Criterion 2 "The designed landscape of Old Scone (sic: Scone Palace)....are important areas for informal countryside recreation also offering excellent views of the city and beyond. They are well managed and green belt designation would add nothing to the management of these areas."
- 6.12 Within Criterion 6 but also referring to the Landscape Capacity Study section pp39 to 41 "The Landscape Capacity Study identified all of the land between New Scone and Gannochy, except for that which is Scone Palace Historic Garden and Designed Landscape, as having potential for development, in landscape terms. It is considered that much of this area could be omitted from the Green belt so as to be available for development, if and when considered by the planning authority to be appropriate on other planning grounds. However the prevention of coalescence is an important Green belt objective so a part of the gap is included in the Green belt to secure the physical separation of New Scone from Gannochy. The part of the gap which is included, at Pickstonhill, has the character of open countryside, forms the setting of New Scone and is visually related to New Scone rather than Gannochy."
- 7.3 Opportunities for enhancement "In terms of recreational provision, the designed landscape of Old Scone(sic: Scone Palace) ... are important areas for informal countryside recreation also offering excellent views... They are well managed and do not need a countryside management/ recreation initiative to enhance public access. Green belt designation is unlikely to add anything to the management of these"
- 8.4 Summary and Conclusions Whilst the countryside around Perth is not generally in need of enhancement or management initiatives, there is scope for a Green belt to contribute to or accelerate the improvement of access and countryside recreation west of the city.

Therefore the study does not identify the need for the green belt particularly in the designed landscape of Scone Palace which was included on the Inventory in 1987 and covers 904.9 Ha.

Critique of the Proposed Perth Green belt

The sections above have; described the proposed Perth green belt, and set out the policy context, (national, regional and local) within which the green belt sits. They also explore the methodology used to establish the Perth green belt. In this section, a critique is presented of this proposed policy including the justification for it, the methodology used to develop the policy, and its boundaries, its size, its boundaries and the policy wording proposed to accompany the map base.

Justification for Green Belt

National Context

The case for a green belt around Perth and its hinterland remains largely unproven. The imposition of this unwieldy planning instrument clearly falls within the category of an "unnecessary planning barrier". The effectiveness of green belts has long been questioned across the UK.

There are many other devices available to the Planning Authority to effectively manage development without needing to resort to a Green belt. A strong spatial strategy which allocates generous amounts of land, including a range of sites which have low infrastructure costs as well as the larger strategic development sites, should be a strong protection against erosion of the setting of Perth. Also, Housing in the Countryside policies can be used effectively to both promote and manage development in the rural hinterland. Other designations of key landscape assets such as National Scenic Areas and Gardens and Designed Landscapes can be used very effectively to protect these assets.

It is clear that the policy does not achieve a suitable balance between the protection of the quality, character, landscape setting and identity of settlements and the need to support the economy and local businesses. A clear long term strategy for the sustainability of Scone Palace and Grounds has been articulated. Some of the key components of that strategy are negatively affected by this designation and are discussed below in the light of the proposed green belt boundaries. Boundaries and Extent of Proposed Green Belt

The extent of the Green belt designation is highly questionable. It covers around 10,283 hectares and is 10.4 miles from east to west and 7.4 miles from north to south, Perth itself only covers 1780 hectares. One of the stated aims in both Tayplan and the LDP is to protect the setting, views and special character of Perth. So the extent of land in green belt and therefore providing its "setting" is out of all proportion to its size. No strategic assessment of views which should be protected appears to have been made. No clear and robust analysis of the topography has been undertaken to assist in defining the "setting of Perth".

Western Boundaries and Pitcairngreen.

The boundaries stretch to the extreme west of Perth, as far as land several miles to the West of Pitcairngreen and indeed encompassing the village of Pitcairngreen. The boundaries are drawn tightly round the settlement of

Pitcairngreen so as to leave minimal room for expansion. There is a small area of land to the east of the village which is undeveloped but within the village boundary, but is it known to be only suitable for low density development. Scone Estates promoted a small area of land to the west of Pitcairngreen to the rear of Bridgeton farmhouse and steading complex, which would provide a small proportionate area of land for development which would allow the village the "room for expansion" required for smaller settlements by SPP para 162. There is a strong visual barrier between Pitcairngreen and Perth made up of a combination of topography and mature trees and woodland. Perth and Kinross Council agreed with this change of boundary and indeed suggested a slightly greater release from green belt in their Schedule 4 document. However the reporter did not deal with this matter. The opportunity now exists for the Council to undertake this change.

Eastern Boundaries.

The green belt boundaries stretch across land on the east bank of the Tay as far north as Lethendy areas which are clearly well out of sight from Perth.

The desire to "sustain the identity of Scone" (Policy 3 Tayplan) is stated as one of the aims of the green belt. However this protection can just as easily be afforded by the use of a settlement boundary which restricts growth in certain areas and allows development in others. The boundaries are drawn tightly to the southern boundary of the village in an area known as Pickstonhill allowing no scope for expansion in this location. However, there is scope for a new southern boundary of substantial tree belt to be put in place, providing a limited area of expansion which could then provide a more defensible and attractive boundary to the southern edge of Scone. Again, Perth and Kinross Council agreed with this change of boundary in their Schedule 4 document. However the reporter did not deal with this matter. The opportunity now exists for the Council to undertake this change in the new LDP.

The proposed green belt boundary has absorbed a relatively small area of well enclosed land to the north of Scone and adjacent to the North Scone (Spoutwells and New Mains) sites. This field is well enclosed on three sides and would offer a sensible area of expansion of the North Scone site in due course and facilitate its development. It should therefore be left out of the green belt. Perth and Kinross Council agreed with this change of boundary in their Schedule 4 document. However the reporter did not deal with this matter. The opportunity now exists for the Council to undertake this change. The green belt boundaries include the Scone Palace Designed Landscape which is clearly well protected at present and which is noted in the Perth Landscape Capacity Study 2001 as being "well managed and do not need a countryside management/recreation initiative to enhance public access. Green belt designation is unlikely to add anything to the management of these." Scone Palace and its hinterland is a major visitor attraction for Perth and indeed Scotland. Its historic significance cannot be over-stated. However, if this attraction and national treasure is to remain available to the public, it must receive sustained investment over time and in order to do so, additional facilities must be developed to complement its offer and attract sufficient funds to ensure its long term sustainability. A number of high quality and well located development opportunities have been identified and are detailed within this document, which would contribute significantly to the sustainability of the Palace. However, the green belt policy as written does not offer the explicit support required to ensure these developments can go ahead.

The Walled Garden covers an area of 2.13 hectares. It is adjacent to the A93 but is well hidden among the mature trees of the designed landscape. It is no longer used for its original purpose and is largely an area of informal grazing. Its proximity to the A93 makes it a suitable opportunity for sympathetic regeneration as a niche retail, visitor accommodation and catering destination adding significantly to the Palace offer. The scope for approval of such facilities should be asserted in the new LDP.

The old sawmill site adjacent to the Walled Garden, is no longer used as an active sawmill and is now a large area (0.66 hectares) of hard standing adjacent to the A93. This site has the potential to be developed as part of the Walled Garden destination catering, accommodation and retail offer.

The designation covers Perth Racecourse which is a significant business and visitor attraction. The scope for it to expand on its current site will be severely restricted by the green belt designation.

Balboughty Farmhouse and steading complex is covered by the proposed green belt boundaries. This listed complex offers considerable opportunity for conversion to high quality housing. However, the complex includes a large amount of hard standing or "rural brownfield" land which currently, under the Housing in the Countryside policy, would allow sensitive redevelopment complementary to the planned conversions. Under the green belt policy, only the conversion of the existing buildings will be allowed. This will severely restrict the ability to bring forward flexible development proposals which allow appropriate and necessary new buildings to complement the offer of the existing buildings. The conversion of traditional buildings such as these is very expensive and therefore will need to be cross-subsidised by new buildings, possibly including some new houses. Under the green belt policy, this will not be allowed. Again the Council agreed with a change of boundary to exclude Balboughty from the green belt designation in their Schedule 4 document. However the reporter did not deal with this matter. The opportunity now exists for the Council to undertake this change.

Green Belt Policy Wording

development.

The wording of the policy at present is restrictive. It sticks rigidly to the examples of the types of development which may be appropriate in the green belt as set out in SPP but does not apply these carefully to the local Perthshire context. The policy notes go on to state that Supplementary Guidance will be developed which will provide a management pan for the green belt with the aim of developing;

"A sustainable rural economy increased recreational usage landscape enhancement where appropriate improvised path network providing links to the wider countryside links to relevant Green networks within settlements" Scone appreciates involvement in developing the Supplementary Guidance and looks forward to further input into its

The policy specifically precludes the application of the Perth and Kinross Housing in the Countryside Policy in this area. In doing so, it also precludes opportunities to regenerate areas which could benefit from new housing development and which are only likely to be capable of regeneration if the financial returns from the construction of new housing are

possible.

The policies in the Housing in the Countryside Policy and Supplementary Planning Guidance (Dec 2011) provide a limited number of useful opportunities to (as the policy states) "encourage sustainable development in rural areas" and "safeguard the character of the countryside; support the viability of communities; meet development needs in appropriate locations; and ensure that high standards of siting and design are achieved" Surely all of these objectives are just as applicable to the green belt as they are to the wider Perth countryside?

The withdrawal of this policy from the green belt area removes some key opportunities to enhance Perth's rural hinterland. The impact on the proposed green belt of this policy would be minimal and its embargo makes an already restrictive policy even more inflexible.

Categories (1) and (2) of the policy provide some scope for infill within existing small building groups. The restrictions applied in the policy are such that this type of development can be strictly controlled. There is therefore no necessity to exclude these aspects of the policy from the green belt.

Category (3) New Houses in the Open Countryside provides limited opportunities which again should not create any particular issues for the green belt. By their very nature the "Existing Gardens" criteria 3.1 (a), suggests an existing suitable setting for a house and restricts it to situations where "development would not fundamentally affect the qualities and integrity of the site." This restriction combined with the "All Proposals" criteria and the "Siting" criteria in the policy should easily be sufficient to provide the necessary quality of proposals to protect the setting of Perth.

The "Walled Garden" category (3.1 (b) by its very nature will have no impact on the wider landscape as development will be contained within high walls. Indeed it is completely contrary to afford this opportunity to assist in the preservation of the walls of such gardens out-with the green belt while not allowing this opportunity within the green belt.

Category 3.2 deals with the relocation of houses away from Flood Risk areas. Given that so much of the Green belt adjoins the Tay river valley, and may be affected by flood risk, it would seem contrary not to allow this aspect of the policy to apply.

Category 3.3 deals with houses required in relation to economic activities. It again appears contrary to the need for sustainable rural development to refuse to allow scope for such proposals in the area around Perth covered by the proposed green belt. Many new rural businesses are more likely to thrive if they are in location close to centres of population. The green belt designation (based on the restrictions on economic activities and on accompany housing in the green belt policy) pushes such business opportunities out-with Perth's immediate hinterland therefore reduces the opportunity for shorter travel distances and ease of access to a key market place.

Category 3.5 Pilot projects creating eco-friendly houses is an attractive and forward-thinking policy which it would be unfortunate to loose from the area covered by the proposed green belt. However, it is less critical a loss than other categories.

Category 4 Renovation or replacement of houses including vacant or abandoned houses is an important positive policy which can assist in making the countryside more attractive and creates a careful use of existing resources by bringing abandoned houses into use. Again it seems illogical not to allow this policy in the rural hinterland of Perth. While aspects of category 5 Conversion are allowed under the proposed green belt policy, the "replacement of redundant non-domestic buildings does not appear to be acceptable. This does not make sense in respect of the stated objectives of the green belt designation – "to preserve the setting, views and special character of Perth". Such buildings may be in a ruinous condition and past the ability to be repaired but may offer a suitable location for redevelopment. The existence of ruinous buildings in the hinterland of Perth will not enhance the city's setting whereas their redevelopment to provide homes would. The green belt designation in its current form will therefore work actively against the environmental improvement of the setting of Perth,

Category 6, Rural Brownfield Land is geared towards removing dereliction and gaining a significant environmental improvement on sites formerly occupied by buildings by allowing a small-scale development of up to 5 houses. The removal of this policy in the proposed green belt, therefore removes the opportunity to achieve this environmental improvement and improve the setting of Perth.

In summary, the removal of the Housing in the Countryside policy from the area proposed to be covered by green belt, also removes a number of opportunities to achieve environmental improvement of the area and to support a range of rural development and economic opportunities.

Green Belt and Renewable Energy

Another aspect of the green belt policy which needs clarified is that relating to renewable energy. Scottish Planning Policy states at paragraph 52 that:

'Local development plans should describe the types and scales of development which would be appropriate within a green belt. These may include......'

While renewable energy proposals are not included in the list, the tone of paragraph 52 indicates that the options that follow are not exhaustive. This is particularly relevant with regard to renewable energy proposals, as such developments continually evolve, and have the ability over-time to incorporate technologies that may have been commercially unviable only a few years ago.

Paragraph 5.1.3 of the Adopted LDP echoes TAYplan in stating that the purpose of the greenbelt is to: manage long-term growth, and preserve the setting, views and special character of Perth and the separate identity of Scone. Paragraph 5.1.4 of the Adopted LDP states (among other things) that the objectives of green belt policy include: controlling the spread of built development, and facilitating the creation of green corridors with improved biodiversity. The National Planning Framework 3 (paragraph 4.7) states that 'We have long sought to protect Scotland's environment, recognising that it is a dynamic resource rather than a fixed asset. To better reflect this, more proactive and innovative environmental stewardship is required.' The document further goes on to state (paragraph 4.12) that 'We are committed to reversing the decline of some habitats and species and regulating environmental pollution.' In the case of well sited ground mounted solar PV arrays, there are opportunities for such developments to be permitted within the green belt in accordance with SPP, NPF3 and the objectives and Strategy of the Adopted Local Development Plan. Well-sited Solar PV developments offer opportunities to establish habitat beneath the arrays, while the modules

themselves remain hidden from public views. As these developments are both temporary and removable, they do not leave any brownfield legacy encouraging future built development on these temporary sites. By contrast, through careful landscape management, habitat can become established during the period when the development quietly generates low-impact renewable energy. Once removed, such enhanced habitat will make a positive contribution to the green belt, and the location of any such evolving habitat can be taken into account when long-term planning of the wider green network is undertaken.

Enhancement of local wildlife and improvements to biodiversity can be designed into such projects through the introduction of wide ecological corridors, bird boxes and bug hotels, and through the retention of field boundaries such as hedgerows. Furthermore, grass and wildflower mix can be introduced between the rows of panels to encourage further biodiversity enhancements, or such land can continue to stay in agricultural use throughout the period the modules are installed in the form of animal grazing beneath the modules.

In relation to policy NE5 therefore it is considered that there are opportunities within the green belt where appropriate forms of renewable energy can be developed now and in the future, which would accord with the objectives of the green belt, and help accelerate improvements to biodiversity therein. As presently drafted, there is no explicit policy support for such development, even when it can be demonstrated that this would support the objectives of the green belt in all other regards. It would therefore be helpful for appropriate forms of renewable energy development to be added as a further qualifying criterion under policy NE5. The following wording is proposed to follow criterion (c):

(d) 'It constitutes uses which advance the Council's Local Development Plan Strategy in support of the development of renewable and low carbon energy, where these can be designed in such a way that biodiversity will be enhanced and/or agricultural uses will continue to take place. Any such proposals shall demonstrate that they accord with the overriding objectives of the green belt, and are appropriate to the character of the green belt.'

Clearly, Scottish Government Policy promotes a growth agenda for the country, and planning policy in particular is required to set a positive policy context for the growth of business and employment opportunities. The imposition of the onerous and unwieldy green belt designation, especially one of the extent and with the policy restrictions envisaged in the Perth and Kinross Proposed Plan, is at odds with this wider growth agenda.

OTHER ISSUES 14. Have we missed any land use planning issue which you consider the revised LDP2 should cover?
Yes
□ No
Don't know
If yes, please detail below, and give reasons for your suggestion(s).
As stated in response to questions 4, 10 and 13, the plan lacks policy guidance on newer forms of renewable energy such a ground-mounted solar PV and the green belt policy needs refined to support appropriate forms of renewable energy development.
HE2 Listed Buildings This policy should go on to state that; "There is support for new uses to keep listed buildings in active use" It is vital that new uses are found for redundant traditional buildings of historic merit in order to ensure that they survive and adapt.
SUPPLEMENTARY GUIDANCE 15. Does the existing LDP have the right balance between Policies and Supplementary Guidance (SG), and does the SG cover the right topic areas?
Yes
✓ No
☐ Don't know
If no, please detail how you think the balance should change &/or which topic areas should be included/excluded, together with your reason(s)

HOUSING IN THE COUNTRYSIDE

The Housing in the Countryside Supplementary Guidance should:

The list of current Supplementary Guidance is as follows:

- Apply in the area of the Proposed green belt which comprises Scone Palace and Estate.
- Make clear that smaller settlements out-with the three tiers of the settlement hierarchy are eligible under the Housing in the Countryside Policy.

Employment and Mixed Use Areas

The same comments apply as were stated against Scone response to Questions 6 and 7.

GREEN INFRASTRUCTURE

The same comments apply as were stated against Scone response to Question 5.

PART 3 DECLARATIONS

	details of these issues may be publicised as part of consultation on this and future on of the Local Development Plan.
Signature	
Development Plan. I her	nis is a submission for the Call for Issues process as part of Perth and Kinross Local reby confirm that the information given in this form is true and accurate to the best of my c submissions, please confirm your statement by ticking the box instead of providing
Signature	
: Name:	Debbie Mackay
Date:	31 March 2015
requirements of the 1998 Da	have been asked to provide on this form will be held and processed in accordance with the sita Protection Act. bout the call for sites process? optional question.
Councils website	
Notice in Newspaper, co	ould you tell us which one below?
PKC Development Plan	Scheme
Telephone enquiry to Co	puncil
Email enquiry to Counci	
Social Media (e.g. Twitte	er, Facebook)
Other, could you tell us h	now below?
Furtherinformation	

Completed Submission forms and location plans should be addressed to developmentplan@pkc.gov.uk

Or alternatively by post to:

Local Development Plan Team Perth and Kinross Council Pullar House 35 Kinnoull Street Perth PH1 5GD

The Call for Issues process will run from Tuesday 20 January 2015 for 10 weeks. Completed Submissions must be received by Tuesday 31 March 2015



Perth and Kinross Local Development Plan

Call for Issues

20 January - 31 March 2015

This form should be used to make a submission to the call for issues process to raise awareness of an issue for consideration in the review of the Perth and Kinross Local Development Plan. Requested information should be concise and to the point.

For help completing this form you are advised to read the associated **Guidance notes** or ring us on 01738 475300

PART 1 APPLICANT AND SITE DETAILS

1. Agents Details (if any)		2. Your details	
Name	Emma Hepplewhite	Name	
Company	Fairhurst	Company	Lafarge Tarmac Limited
Building No./Name	1	Building No./Name	
Address	Arngrove Court Barrack Road Newcastle NE4 6DB	Address	C/o agent
Town/City	Newcastle	Town/ City	
Postcode	NE4 6DB	Postcode	
Telephone	0191 221 0505	Telephone	
Mobile		Mobile	
Email		Email	
3. Who is the main contac	t for this submission?		
Agent You			

PART 2 IDENTIFYING ISSUES

CLIMATE CHANGE 4. 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 <u>EP1</u> & <u>EP2</u> (and associated <u>Supplementary Guidance</u>) of the existing Local Development Plan (LDP) adequately address this issue?
Yes
□ No
Don't know
If no, tell us what change you would like to see, and why?
HEALTHIER LIVES 5. 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?
Yes
□ No
Don't know
If yes, please tell us what change you would like to see and why?

BUSINESS, TOURISM AND LESIURE 6. Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and businesses?
Yes
✓ No
☐ Don't know
If no, please tell us what you consider should change and why?
Lafarge Tarmac Limited object to the lack of flexibility provided for businesses based on existing employment sites within the provisions of LDP Policies (ED1 – 5).
Policy ED1A states that 'areas identified for employment uses should be retained for such uses.' Lafarge Tarmac Limited agree with the principle of this statement. Notwithstanding this, a small number of employment generating land uses may naturally come to an end due to operational reason, for example when a working quarry comes to the end of its life. Therefore, it is considered that a clause is required to enable existing employment sites to be considered for other uses, where it is no longer possible to provide employment generating uses.
7. Do the existing LDP policies (ED1-5) adequately encourage new employment sites and businesses?
Yes
□ No
☐ Don't know
If no, please tell us what you consider should change and why?
CITY AND TOWN CENTRES 8. 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?
Yes
□ No
☐ Don't know
If no please tell us for which town(s) and why you consider this to be the case.

9. Do policies RD1-6 provide a satisfactory framework for consideration of residential development within Perth & Kinross?
Yes
── No
☐ Don't know
Please give your reason(s) for your answer.
Please see the attached Addendum Note.
LOW CARBON TRAVEL, HEAT AND POWER 10. 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 policy ER1, Transport policy TA1 and Climate Change, Carbon Reduction and Sustainable Construction policy EP1 of the existing LDP need updating to enable Perth & Kinross Council to fulfill its obligations in this respect?
☐ Yes
□ No
☐ Don't know
If yes, please tell us what changes you consider would be appropriate and why?
RESOURCE SECURITY 11. 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?

12. Are other Natural Resources adequately protected by the LDP Policies (ER3)?
Yes
□ No
Don't know
If no, explain what aspects of the policy you consider should be altered and why?
GREEN/BLUE NETWORKS
Green/Blue spaces and networks include any area of open space whether public or private; gardens, parks, woodlands and hedgerows. These are all important. It also includes water systems such as rivers, lakes and ponds, and the coastline. Networks refer to the interlinking of these spaces and features all of which have a host of benefits, for both people and biodiversity, e.g. Being utilised for travel to work (such as a footpath network), for leisure (e.g. parkland, woodland, sea-shore) or perhaps providing a habitat for important species.
13. Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately protect and promote green and blue networks?
Yes
□ No
Don't know
If you answered no, please help us by explaining how they should be changed, and your reason(s).
OTHER ISSUES 14. Have we missed any land use planning issue which you consider the revised LDP2 should cover?
Yes
□ No
Don't know

If yes, please detail below, ar	nd give reasons for your suggestion(s).
SUPPLEMENTARY GUIDAN 15. Does the existing LDP I the SG cover the right topic	nave the right balance between Policies and Supplementary Guidance (SG), and does
Yes	
□ No	
Don't know	
If no, please detail how you t with your reason(s).	hink the balance should change &/or which topic areas should be included/excluded, together
DADT O DEOL ADATIONO	
PART 3 DECLARATIONS	
	letails of these issues may be publicised as part of consultation on this and future phases Local Development Plan.
Signature	
Development Plan. I here	is is a submission for the Call for Issues process as part of Perth and Kinross Local eby confirm that the information given in this form is true and accurate to the best of my submissions, please confirm your statement by ticking the box instead of providing
Signature:	
Name:	Emma Hepplewhite
Date:	30th March 2015

Any personal data that you have been asked to provide on this form will be held and processed in accordance with the requirements of the 1998 Data Protection Act.

36. How did you find out about the call for sites process? optional question.
Councils website
Notice in Newspaper, could you tell us which one below?
PKC Development Plan Scheme
Telephone enquiry to Council
Email enquiry to Council
Social Media (e.g. Twitter, Facebook)
Other, could you tell us how below?
Further information

Completed Submission forms and location plans should be addressed to developmentplan@pkc.gov.uk

Or alternatively by post to:

Local Development Plan Team Perth and Kinross Council Pullar House 35 Kinnoull Street Perth PH1 5GD

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Addendum Note - 'Perth and Kinross Local Development Plan' Call for Issues Representation

This addendum note provides additional information to the form titled 'Perth and Kinross Local Development Plan: Call for Issues', which was unable to be included in the form template.

Answer to Question 9:

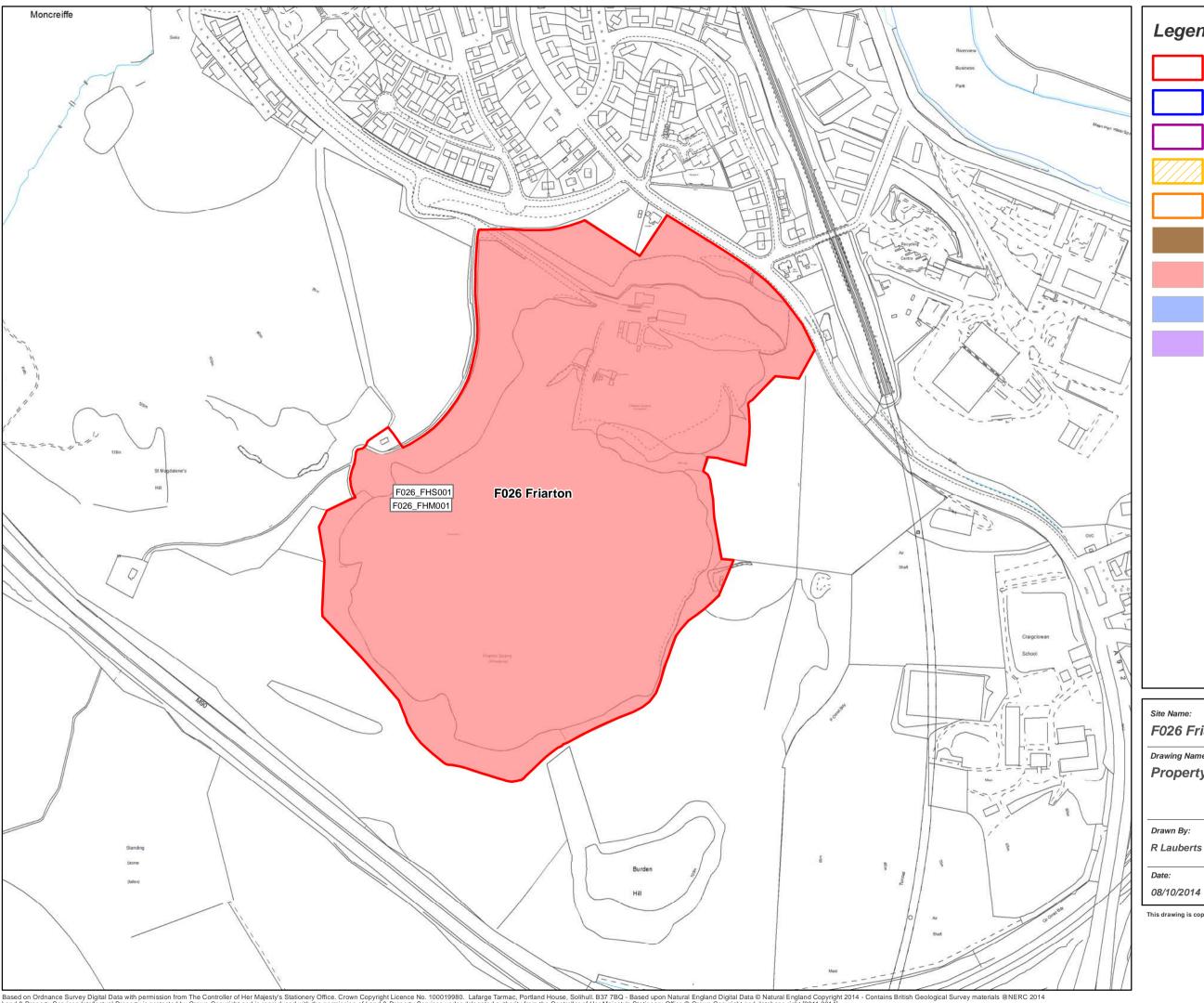
Lafarge Tarmac Limited supports Policy RD1 which states: 'Changes away from ancillary uses such as employment land, local shops and community facilities will be resisted unless there is demonstrable market evidence that the existing use is no longer viable.' This will successfully provide flexibility for changes in land use in cases where land which no longer suitable for other uses, which, will contribute to the supply of housing land and ensure the plentiful delivery of housing required. Therefore this element of Policy RD1 must be retained within the Perth and Kinross Local Development Plan.

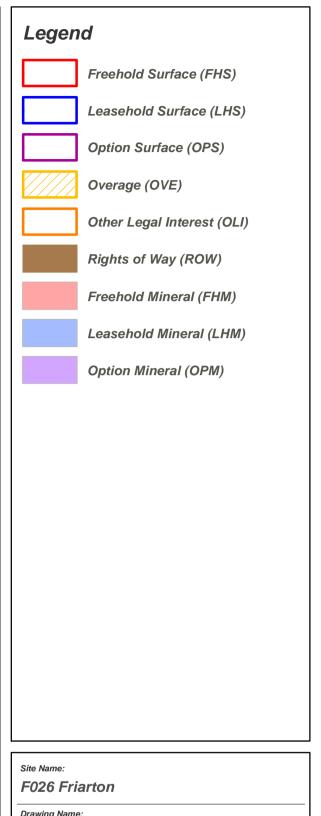
Criteria one of Policy RD1 is welcomed, which provides encouragement for new housing development which states: '(a) Infill residential development at a density which represents the most efficient use of the site while respecting its environs.' It is considered that this will encourage housing development within the existing settlement boundaries, which are likely to be the most sustainable locations: close to existing services, facilities and public transport linkages. It is considered that sites that will meet this criteria includes 'Friarton Quarry', located at the southern boundary of Perth (see site plan 'Property Parcel Plan on OS Base') owned by Lafarge Tarmac Limited.

Lafarge Tarmac Limited welcomes Policy RD6 which supports residential developments supporting housing for particular needs, which 'should be located in residential areas where residents have access to local services and facilities and are integrated within the local community.' It is considered that the 'Friarton Quarry' site (see site plan 'Property Parcel Plan on OS Base') owned by Lafarge Tarmac Limited, is a highly suitable site to provide such accommodation. The sites indicative proposal (see attached 'Concept Masterplan') demonstrates the sites ability to provide a care home which is well integrated into a wider development, including residential dwellings and a leisure facility. The proposed leisure element, making up the southern part of the site could include the provision of a range of facilities, including: a dry ski slope, climbing walls and mountain biking. Therefore, the proposed care home would benefit from its integration with a wider local community living onsite and its close proximity to services within the settlement of Perth. For example, the site lies within easy walking distance (500m) of a number of services including local convenience store and Moncreiffe Primary School, and lies adjacent a bus stop which provides access to a large number of bus services, linking the site to the centre of Perth and other surrounding settlements.

It is considered that the policy on residential development would be strengthened through an additional clause which concretes new housing development in and around existing settlements, such as Perth







Property Parcel Plan on OS Base R Lauberts 1:4,000 Drawing No:

Property Plan





Perth and Kinross Local Development Plan

Call for Issues

20 January - 31 March 2015

This form should be used to make a submission to the call for issues process to raise awareness of an issue for consideration in the review of the Perth and Kinross Local Development Plan. Requested information should be concise and to the point.

For help completing this form you are advised to read the associated Guidance notes or ring us on 01738 475300

PART 1 APPLICANT AND SITE DETAILS

1. Agents Details (if any)	2. Your details	
Name	Name	Jean Ann Scott Miller
Company	Company	Crieff Community Council
Building No./Name	Building No./Name	Pittachar
Address	Address	
Town/City	Town/ City	Crieff
Postcode	Postcode	PH7 3RU
Telephone	Telephone	
Mobile	Mobile	
Email	Email	CrieffCommunityCouncil@pkc.gov.uk
3. Who is the main contact for this submission?		-26
Agent Vou		920

PART 2 IDENTIFYING ISSUES

CLIMATE CHANGE
4. 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 <u>EP1</u> & <u>EP2</u> (and associated <u>Supplementary Guidance</u>) of the existing Local Development Plan (LDP) adequately address this issue?
Yes
No No
✓ Don't know
If no, tell us what change you would like to see, and why?
Please read the comments made in the document attached to this form.
Readers should also be aware of the jointly written, detailed submission made on 24 March 2015 by the Crieff & Upper Stratheard Partnership, the Crieff Community Council and the Crieff Community Trust in response to the Call for Issues. This document was sent to the Local Development Plan Team and can also be read the Crieff Community website, Crieff.org
HEALTHIER LIVES 5. 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?
☐ Yes
□ No
☑ Don't know
If yes, please tell us what change you would like to see and why?
Please read the comments made in the document attached to this form.

BUSINESS, TOURISM AND LESIURE 6. Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and businesses?
Yes
No No
Don't know
If no, please tell us what you consider should change and why?
Please read the comments made in the document attached to this form.
7. Do the existing LDP policies (ED1-5) adequately encourage new employment sites and businesses?
Yes
No Popth knows
Don't know
If no, please tell us what you consider should change and why?
Please read the comments made in the document attached to this form.
CITY AND TOWN CENTRES
8. 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?
☐ Yes
✓ No
Don't know
If no please tell us for which town(s) and why you consider this to be the case.
Please read the comments made in the document attached to this form.

9. Do policies RD1-6 provide a satisfactory framework for consideration of residential development within Perth 8 Kinross?
Yes
✓ No
Don't know
Please give your reason(s) for your answer.
Please read the comments made in the document attached to this form.
LOWER PROVIDE LIEST AND POWER
LOW CARBON TRAVEL, HEAT AND POWER 10. 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 policy ER1, Transport policy TA1 and Climate Change, Carbon Reduction and Sustainable Construction policy EP1 of the existing LDP need updating to enable Perth & Kinross Council to fulfill its obligations in this respect?
Yes
□ No
☑ Don't know
If yes, please tell us what changes you consider would be appropriate and why?
Please read the comments made in the document attached to this form.

RESOURCE SECURITY

11. Existing policy <u>ER3</u> 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?

Please read the comments made in the document attached to this form.

12. Are other Natural Resources adequately protected by the LDP Policies (ER3)?
Yes
No No
Don't know
If no, explain what aspects of the policy you consider should be altered and why?
Please read the comments made in the document attached to this form.
GREEN/BLUE NETWORKS
Green/Blue spaces and networks include any area of open space whether public or private; gardens, parks, woodlands and hedgerows. These are all important. It also includes water systems such as rivers, lakes and ponds, and the coastline. Networks refer to the interlinking of these spaces and features all of which have a host of benefits, for both people and biodiversity, e.g. Being utilised for travel to work (such as a footpath network), for leisure (e.g. parkland, woodland, sea-shore) or perhaps providing a habitat for important species.
13. Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately protect and promote green and blue networks?
Yes
No No
Don't know
If you answered no, please help us by explaining how they should be changed, and your reason(s).
Please read the comments made in the document attached to this form.
e e
OTHER ISSUES
14. Have we missed any land use planning issue which you consider the revised LDP2 should cover?
✓ Yes
□ No
Don't know

OUDD! EMENTADY	CUIDANGE
SUPPLEMENTARY 15 Does the existi	ng LDP have the right balance between Policies and <u>Supplementary Guidance</u> (SG), and does
the SG cover the r	
	•
Yes	
☐ No	
✓ Don't know	
If no, please detail h with your reason(s).	now you think the balance should change &/or which topic areas should be included/excluded, together
Please read the com	ments made in the document attached to this form.
×.	
PART 3 DECLAR	ATIONS
-	
of the preparation	ept that details of these issues may be publicised as part of consultation on this and future phases on of the Local Development Plan.
Signature	
/ the agent cert	ify that this is a submission for the Call for Issues process as part of Perth and Kinross Local
I/ the agent cert Development P	lan. I hereby confirm that the information given in this form is true and accurate to the best of my
	electronic submissions, please confirm your statement by ticking the box instead of providing
signature).	
0:	
Signature:	
Name:	Jean Ann Scott Miller
Date:	30 March 2015
Any paracral data t	hat you have been asked to provide on this form will be held and processed in accordance with the
	hat you have been asked to provide on this form will be held and processed in accordance with the 1998 Data Protection Act.
qui oonto o i trio	

If yes, please detail below, and give reasons for your suggestion(s).

Please read the comments made in the document attached to this form.

36. How did you find out about the call for sites process? optional question.	
Councils website	
Notice in Newspaper, could you tell us which one below?	
PKC Development Plan Scheme	
Telephone enquiry to Council	
Email enquiry to Council	
Social Media (e.g. Twitter, Facebook)	
Other, could you tell us how below?	
Further information	

Completed Submission forms and location plans should be addressed to developmentplan@pkc.gov.uk

Or alternatively by post to:

Local Development Plan Team Perth and Kinross Council Pullar House 35 Kinnoull Street Perth PH1 5GD

The Call for Issues process will run from Tuesday 20 January 2015 for 10 weeks. Completed Submissions must be received by Tuesday 31 March 2015.

<u>Please read</u> the comments intended to be read in response to the Call for Issues (overleaf)







Perth & Kinross Council's Local Development Plan Call for Issues was forwarded to Crieff Community Council. Enquiries with other interested local groups, i.e. those that responded by making submissions as the current Local Development Plan was being drafted, revealed that they had not been informed of the Call for Issues nor had they received the Council's submission form.

This response is made on behalf of Crieff Community Council, Crieff & Upper Strathearn Partnership and Crieff Community Trust.

There is a shared view that the form has been designed only to suit the needs of planners within the local authority. The form seeks the answers to a series of policy questions that no doubt stimulate the minds of professional planners, but which fail to place the immediate requirements and concerns of residents at its heart.

Community groups are asked to assess the local authority's policies within the existing LDP in respect of:

- Climate change
- Healthier Lives
- Business, tourism and leisure
- City and town centres
- Residential Development
- · Low carbon travel, heat and power
- Green/Blue Networks
- Resource security
- Other Issues, i.e. any land use planning issue that LDP2 should cover
- Supplementary Guidance is the balance correct between policies and supplementary guidance?

Whilst residents appreciate the importance of providing policy guidance for planners and the public, an over concentration on these principles can lead to stagnation of development and failures to appreciate that demands are being made - and/or understand the reason(s) why communities are making them.

Rather than addressing the planning process via a series of policies aimed at ensuring local authority compliance in respect of a series of principles that it has drawn up, the primary concern for all planning matters should focus on understanding local needs and wherever possible meeting them.

It is accepted that policies are necessary to provide a general framework and set of principles to allow consistency in decision-making, but the driving ambition of local authority planners should surely be to identify what are the main issues for the local population and if there are achievable strategies that will provide the required resources to remedy local concerns?

Were the local authority to adopt a policy of community led planning it should be able to achieve a partnership which would engender mutual trust and respect as

well as ensuring development for the settlements concerned were both appropriate for the area and wanted.

There will always be the potential for one settlement's wishes to bring it into conflict with another settlement or settlements. An engaged and credible local authority should be able to guide its local communities, ensure all the issues are presented fairly for consideration and that an objective, lawful and clearly explained rational outcome is reached.

It should also recognise that in some instances appeal processes are required and it should make the same effort to ensure fairness, objectivity, legal compliance and easily understood outcomes are achieved.

The Call for Issues form appears to be planners simply passing on the questions they ask of themselves to the community. The author(s) of this document must surely be aware that community groups comprise unpaid, non full-time, voluntary workers.

The vast majority of community volunteers are not paid to spend 40 hours or more each week to ponder principles of planning. This failure to appreciate the difference between considerations that can be made as paid employees, as opposed to part time community representatives, illustrates the Council's failure to understand the time constraints felt by most voluntary representatives.

The community expects the Council to sensibly obey the law of the land with regard to its handling of climate change, healthier lives, city and townscape planning etc. It does not expect the Council to be adding additional and/or unnecessary layers to national planning requirements.

There is also a danger that endless policies and guidance notes obstruct what should be the purpose of Council planning policy – to meet housing, employment, leisure, business needs etc. by working cooperatively with local communities.

Crieff expects the local authority to comply with legal requirements in respect of planning and development and related issues. It does not expect or want its local authority to spend its time endlessly 'navel gazing', i.e. setting additional policies and guidance, reviewing existing ones or touting for opinion.

The public expects the local authority to be mindful of climate change, its likely effects and to consider whether the developments under consideration would be robust enough to cope with the impacts of increasingly higher flood risk and temperature changes.

This same approach, an awareness of the local authority's legal requirements in conjunction with a pragmatic outlook focused on achieving community support and benefit should be discharged in respect of concerns about 'healthier lives', low carbon travel, heat and power and resource security.

Obvious areas where the local authority would benefit from developing genuine community engagement would be in response to its quest to ensure appropriate policies are implemented in respect of its strategies for business, tourism and leisure, city and town centres, residential development and the so called 'green/blue' networks.

The Call for Issues form (20 January – 31 March 2015) selfishly focuses on the perceived needs of professional planners within the local authority.

Community groups in Crieff call for a complete renaissance in local authority outlook. Instead of focussing on targets set regionally and nationally Perth & Kinross Council should place the needs of its residents first and foremost.

Additional demands for development should only be accepted if the local authority has ensured required finance and infrastructure are in place and that proposed development will have broad local community support.

NB. Readers of this document should also avail themselves of the letter submitted by Crieff community groups on <u>24 March 2015</u> to the Local Development Plan Team. This letter clearly defines many community concerns and also calls for radical action by Perth & Kinross Council.

MAB/LJC

31 March 2015

Mrs Brenda Murray
Mr Peter Marshall
Planning & Sustainable Development
Perth & Kinross Council
Pullar House
35 Kinnoull Street
PERTH
PH1 5GD

The Atrium 137 Glover Street Perth PH2 0JB

Tel: 01738 475000

Email: mbarnacle@pkc.gov.uk

www.pkc.gov.uk

Moorend Walkmill Crook of Devon KINROSS KY13 0UZ

Tel: 01577 840516

An Independent Councillor



Dear Colleagues

Review of Local Development Plan (LDP) - Main Issues Report

I circulated the Kinross-shire Ward Community Councils and fellow elected members on 12/2/15 regarding your call for issues for the above and have since attended a number of meetings to discuss same.

I would like to particularly commend the submissions of Fossoway and Portmoak Community Councils and the Kinross-shire Civic Trust, copied to me, which I find much agreement with. I now outline my thoughts on issues I would like you to consider for the review of our LDP, viz:-

TRANSPORT ISSUES

I refer to my letter of 16/3/15 to Jim Valentine on the need for 'major' mitigation measures for the A977 reinforced by Paragraph 7.1.18 of our current LDP. On 26/2/15 elected members met with Paul Tetlaw from Transform Scotland regarding the restoration of a rail link through Kinross-shire and an aspiration that Perth should be a new inter-city rail hub; I have their Inter-City Express campaign literature to support this.

The use of certain roads within Kinross-shire by HGV's and repeated requests for directional signage of suitable routes and speed control measures remain an issue. There is a distinct lack of areas zoned for parking in settlements; this should be looked at particularly in Crook of Devon, Kinnesswood, Kinross and Scotlandwell.

POLICIES AND SUPPLEMENTARY GUIDANCE

On the 23/3/15 I emailed Committee colleagues regarding Landscape Guidance expressing my strong disagreement to the loss of 2 former AGLV areas, namely the Cleish Hills and the River Devon and its gorge, from securing Local Landscape designation. I am highly critical of the consultants' exercise on this, in ignoring the strong representations made within the Review Panel and I would like the Planning Department to reconsider their stance on this matter, being particularly aggrieved that you emphasised delay at Committee if amendments

were made when it has taken PKC 5 years to address this matter, so ask if you would agree to look again at these areas, as requested by local members at their meeting on 26/3/15.

In a letter to Nick Brian of 18/1/12 I called for a halt to any further large scale windfarm developments in the Ochil Hills and reiterate this, given developments since; it is now urgent that a spatial framework for wind energy developments is completed, noted by me in April 2012 and still awaited.

We should be seeking greater protection for prime agricultural land, in accordance with national planning policy, whilst promoting more development at appropriate brownfield sites. Policy PM4 failed to protect a former village setting area from development at Keltybridge and I feel it should be reinforced, whilst allowing for exceptions on grounds of community benefit. Could you explain why the concept of village setting was dropped from our current LDP?

I would like to see a review of our open-door policy RD5 on gypsy/traveller sites, which are a particular problem in Kinross-shire. Mostly retrospective in their development, it is clear that the 'protocol' between SEPA, SNH and PKC adopted in October 2014 is not effective in dealing with these. It is essential that drainage arrangements are authorised before planning applications are approved and I submit that this policy should not apply in the Lochleven Catchment Area which would by default enhance protection of the Loch under Policy EP7. My email to Committee colleagues of 14/3/15 relating to the considerable number of breaches of conditions at the Crook Moss site is very relevant, particularly on drainage, with planning to bring back a Report to Committee within 6 months but noting the applicants have been on site within the catchment since March 2012 and no drainage or water supply conditions have been met, which I find completely unacceptable; if no progress is made during this period then revocation of permission has to be a serious option.

I would like to see the Crook Moss and the Perth Lade considered for declaration as SSSI's.

I am aware of reluctance to propose new conservation areas but reiterate previous calls for Back Crook, Keltybridge/Maryburgh and Milnathort to be considered and consulted on.

Policy EP13 covers Airfield Safeguarding, which I had called for; however, I have noted some recent planning decisions around Portmoak that concern me and seek some reassurance that the gliding facility there will not be compromised given its huge importance to the area.

SETTLEMENT PLANNING AND BOUNDARIES

This review is a good opportunity to examine Employment, Housing and Opportunity Sites allocated in our current LDP and make sure they are deliverable.

It is particularly relevant to Employment zoning because I have always been against development west of the M90, whilst existing sites remained underdeveloped. There is also a further opportunity to clarify the retention and status of Turfhills Environment/Roads Depot. An employment site for Crook for Devon should be considered.

I would like the work of the Fossoway Community Strategy Group acknowledged in Paragraph 7.1.12 of our current LDP to be built on and perhaps the finalised maps for Blairingone, Crook of Devon, Powmill and Rumbling Bridge produced by that Group could be looked at again alongside the current settlement plans in our LDP, perhaps involving Fossoway Community Council and Kinross-shire Civic Trust in further meetings with yourselves, elected members and the wider public. This is relevant when one considers

paragraph 7.1.18 on A977 mitigation referred to earlier and possible proposals coming forward for housing that may assist in delivering same at Blairingone, Crook of Devon and Powmill. I would not, however, support re-consideration of the Naemoor Road site in Crook of Devon that I asked to be dropped from our LDP in October 2011; its exclusion vindicating the long campaign by the community over many years opposed to this development.

Nine of the 12 settlements that had their boundaries removed in Kinross-shire are located within the Lochleven Catchment Area and I would like consideration of their re-instatement. Carnbo has seen considerable development recently but has no services, so I strongly suggest the provision of mains drainage should be an aspiration, with the apparently permanent builders' yard to the west of the village boundary returned to agricultural usage.

Drum needs a local ditch and watercourse management scheme in the absence of a flood prevention scheme, given its very high water table (Policy EP3D should apply?) The capacity of the current WWTP at Drum should be considered for expansion, given current development constraints.

Can the Greenacres gypsy/traveller site boundary in our current LDP be enclosed to prevent further retrospective expansion beyond it, perhaps with adequate landscaping and tree screening as suggested in Policy RD5B(b)?

Finally, in the Portmoak area, I would support the inclusion of Stephen's Field into the Kinnesswood boundary and the linkage of Kilmagadwood and Scotlandwell into one settlement boundary with consideration of ensuring that H54 should be single storey housing possibly extended eastwards to achieve same, whilst ensuring an open space corridor between Leslie Road and the southern settlement boundary.

I have resisted detailed comment on the Kinross/Milnathort settlement boundary, although maintaining site H46 and the Market Park site as open space/community woodland are important to the community.

CONCLUSION

As you will appreciate most of my comments relate to the Kinross-shire Ward I represent but I hope you will find them helpful as a basis for further consultation on the Main Issues Report.

Yours sincerely



Cllr Michael Barnacle Independent Member for Kinross-shire

- ps Please let me know if you require clarity on any points or any background correspondence referred to.
- cc Kinross-shire Ward Community Councils
 Kinross-shire Civic Trust
 Councillor Dave Cuthbert
 Councillor Joe Giacopazzi
 Councillor Willie Robertson



Perth and Kinross Local Development Plan

Call for Issues

20 January - 31 March 2015

This form should be used to make a submission to the call for issues process to raise awareness of an issue for consideration in the review of the Perth and Kinross Local Development Plan. Requested information should be concise and to the point.

For help completing this form you are advised to read the associated **Guidance notes** or ring us on 01738 475300

PART 1 APPLICANT AND SITE DETAILS

1. Agents Details (if any)		2. Your details	
Name		Name	Frances Garden
Company		Company	N/A
Building No./Name		Building No./Name	
Address		Address	
Town/City		Town/ City	
Postcode		Postcode	
Telephone		Telephone	
Mobile		Mobile	
Email		Email	
3. Who is the main contact	for this submission?		
☐ Agent ✓ You			

PART 2 IDENTIFYING ISSUES

CLIMATE CHANGE 4. 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 <u>EP1</u> & <u>EP2</u> (and associated <u>Supplementary Guidance</u>) of the existing Local Development Plan (LDP) adequately address this issue?
☐ Yes
No
Don't know
If no, tell us what change you would like to see, and why?
HEALTHIER LIVES 5. 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?
Yes
□ No
☑ Don't know
If yes, please tell us what change you would like to see and why?

BUSINESS, TOURISM AND LESIURE 6. Do the existing LDP policies (ED1-5) adequately protect the existing employment sites and businesses?
Yes
□ No
✓ Don't know
If no, please tell us what you consider should change and why?
7. Do the existing LDP policies (ED1-5) adequately encourage new employment sites and businesses?
☐ Yes
✓ Don't know
If no, please tell us what you consider should change and why?
CITY AND TOWN CENTRES 8. 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?
Yes
□ No
✓ Don't know
If no please tell us for which town(s) and why you consider this to be the case.

RESIDENTIAL DEVELOPMENT 9. Do policies RD1-6 provide a satisfactory framework for consideration of residential development within Perth & Kinross?
Yes
□ No
✓ Don't know
Please give your reason(s) for your answer.
LOW CARBON TRAVEL, HEAT AND POWER 10. 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 policy ER1, Transport policy TA1 and Climate Change, Carbon Reduction and Sustainable Construction policy EP1 of the existing LDP need updating to enable Perth & Kinross Council to fulfill its obligations in this respect?
☐ Yes
□ No
✓ Don't know
If yes, please tell us what changes you consider would be appropriate and why?
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12. Are other Natural Resources adequately protected by the LDP Policies (ER3)?
Yes
□ No
☑ Don't know
If no, explain what aspects of the policy you consider should be altered and why?
GREEN/BLUE NETWORKS
Green/Blue spaces and networks include any area of open space whether public or private; gardens, parks, woodlands and hedgerows. These are all important. It also includes water systems such as rivers, lakes and ponds, and the coastline.
Networks refer to the interlinking of these spaces and features all of which have a host of benefits, for both people and biodiversity, e.g. Being utilised for travel to work (such as a footpath network), for leisure (e.g. parkland, woodland, sea-shore)
or perhaps providing a habitat for important species.
13. Do the existing policies (NE1-6) and associated Supplementary Guidance of the LDP adequately protect and
promote green and blue networks?
∐ Yes □ No
☑ No Don't know
If you answered no, please help us by explaining how they should be changed, and your reason(s).
OTHER ISSUES 14. Have we missed any land use planning issue which you consider the revised LDP2 should cover?
✓ Yes
□ No
☐ Don't know

If yes, please detail below, and give reasons for your suggestion(s).

Monarch Deer Farm on Naemoor Road in Crook of Devon is outside the settlement boundary in the current Local Plan, which I am pleased to see because this means that it is not designated for housing development (as per Policy PM4 in the current Local Plan). Most of the residents of Crook of Devon are opposed to the site being developed for housing. I share that view and am very pleased that this is reflected in the Local Plan and wish to see this continue in the next plan. Our landscape is very important as a draw for tourism and I would like the Local Landscape Areas to provide the same protection as the AGLVs did previously (currently they do not extend as far as the former AGLVs). I would like this issue to be considered in the Main Issues Report with a view to extending the LLA boundaries to match the former AGLVs. SUPPLEMENTARY GUIDANCE 15. Does the existing LDP have the right balance between Policies and Supplementary Guidance (SG), and does the SG cover the right topic areas? ☐ Yes □No ✓ Don't know If no, please detail how you think the balance should change &/or which topic areas should be included/excluded, together with your reason(s). **PART 3 DECLARATIONS** / I /the agent accept that details of these issues may be publicised as part of consultation on this and future phases of the preparation of the Local Development Plan. Signature I/ the agent certify that this is a submission for the Call for Issues process as part of Perth and Kinross Local Development Plan. I hereby confirm that the information given in this form is true and accurate to the best of my knowledge (for electronic submissions, please confirm your statement by ticking the box instead of providing signature). Signature:

Any personal data that you have been asked to provide on this form will be held and processed in accordance with the requirements of the 1998 Data Protection Act.

Frances Garden

30/03/2015

Name:

Date:

36. How did you find out about the call for sites process? optional question.
Councils website
Notice in Newspaper, could you tell us which one below?
PKC Development Plan Scheme
Telephone enquiry to Council
Email enquiry to Council
Social Media (e.g. Twitter, Facebook)
Other, could you tell us how below?
Further information

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Or alternatively by post to:

Local Development Plan Team Perth and Kinross Council Pullar House 35 Kinnoull Street Perth PH1 5GD

The Call for Issues process will run from Tuesday 20 January 2015 for 10 weeks. Completed Submissions must be received by Tuesday 31 March 2015.

From: <u>Alasdair Finlayson</u>

To: <u>TES Development Plan - Generic Email Account</u>

 Subject:
 FW: Planning

 Date:
 04 May 2015 11:54:20

From: Euan Bremner

Sent: 20 April 2015 14:01

To: Jim Valentine; David Littlejohn; Nick Brian; Brenda Murray; Ian Innes; Andy Baxter;

<u>CRLBrien@pkc.gov.uk</u>; Callum Petrie; Steve Callan; Brian Stanford;

Councillor Michael Williamson

Subject: Planning

Dear Sir or Madam

I recently views some websites describing the local plans of certain local governments in Australia n where I had worked as a planner for some years.

The details provides were much clearer that those available in development plans here and the relationships with other council policies and projects more easy to find. It is often possible to learn from the website just what would be allowed or not on a particular plot and the details which would apply to an approval.

This means that there is far less scope for applicants, commentators, members and officials to choose which policies to use, and how to interpret and apply these.

There are then fewer disputes, complaints and appeals. In all of the eight states/territories these are handled by independent bodies, eg, courts or tribunals, as is the

case in Ireland, Canada and New Zealand. There is not the conflict of interest which occurs with the DPEA which is both an executive arm of the Scottish Government and and a "quasi-judicial" body. It is obliged to give priority to national policies over those of local governments. and this is seen by many as undemocratic.

There is less need for "pre-application consultations which often supply inadequate information. Council officers are willing to discuss personally

It is not seen why development plans here should not be more similar to those in Australia where many of the aims and policies are similar but better articulated.

The matter can be examined in the course of preparing the new development plan.

Examples are given below. The websites give details of plans, policies etc. Note that in some cases there are "development control plans" as well as the "local environment

plans" which correspond to development plans here.

If Perth is to achieve its aims of being a place where innovation is furthered its council needs to seek the learn form other countries. Most planners I have encountered in Scotland seem to have little knowledge of, or interest in what is done elsewhere, even in adjacent local government areas.

www.perth.wa.gov.au www.goldcoast.qld.gov.au

www.stirling.wa.gov.au www.sunshinecoast.qld.gov.au

www.holroyd.nsw.gov.au www.brisbane.qld.gov.au

www.bmcc.nsw.gov.au www.wangaratta.vic.gov.au

Yours faithfully

Ewan Bremner BSc(Eng) MURP

www.sunshinecoast.qld.gov.au

From: <u>Brenda Murray</u>

To: <u>TES Development Plan - Generic Email Account</u>
Subject: FW: Supplementary Guidance on Landscape

Date: 13 May 2015 14:39:23

Alasdair

As discussed

Brenda

From: Alistair Smith [mailto:moiraandal@balgedie.fsnet.co.uk]

Sent: 12 May 2015 08:55

To: Peter Marshall; Brenda Murray

Cc: Councillor Dave Cuthbert; Councillor Joe Giacopazzi; 'Michael Barnacle'; Councillor William

Robertson

Subject: RE: Supplementary Guidance on Landscape

Dear Peter

Thank you for your reply and I am sorry to hear that Graham is off on sick leave. I hope that he is better soon.

I note your comments and that the Gorge is being considered as a geodiversity site. I look forward to hearing further from you

Regards,

Alistair Smith Kinross-shire Civic Trust



moiraandal@balgedie.fsnet.co.uk

From: Peter Marshall [mailto:PJMarshall@pkc.gov.uk]

Sent: 12 May 2015 08:16

To: 'Alistair Smith'; Brenda Murray

Cc: Councillor Dave Cuthbert; Councillor Joe Giacopazzi; Michael Barnacle; Councillor William

Robertson

Subject: RE: Supplementary Guidance on Landscape

Dear Alastair, Unfortunately Graham is off on long term sick leave so I would suggest that any correspondence is directed to me or Brenda Murray until further notice. I can assure you that certainly the Cliesh Hills issue was considered very carefully and the Council opted not to include them in a LLA. I note your intention to propose a review through the LDP2. With regard to the Gorge we are currently exploring recognising it as a giodiversity site and will keep you informed when we find out more.

Peter Marshall

Strategy & Policy Manager – Planning & Regeneration
Perth & Kinross Council
The Environment Service
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Perth
PH1 5GD

Phone: 01738 47 53 84

Fax: 01738 47 65 10

Email: PJMarshall@pkc.gov.uk
Website http://www.pkc.gov.uk

From: Alistair Smith [mailto:moiraandal@balgedie.fsnet.co.uk]

Sent: 11 May 2015 16:42

To: Graham Esson

Cc: Peter Marshall; Councillor Dave Cuthbert; Councillor Joe Giacopazzi; Michael Barnacle; Councillor

William Robertson

Subject: Supplementary Guidance on Landscape

Dear Graham

On behalf of the Kinross-shire Civic Trust, I am writing to express our extreme disappointment about the Supplementary Guidance on Landscape that has been adopted by the Council.

The Trust is at a loss that the Cleish Hills and the River Devon Gorge have not been included in the list of the Local Landscape Areas. The Trust cannot understand how your Landscape Consultants, LUC did not include the 2 of them in their list. As far as the Trust is aware, no reasons were ever advanced publicly as to why they were excluded.

In submitting their submission, the Trust used the same criteria as LUC had used in justifying the LLAs they submitted, to justify the Cleish Hills inclusion and as far as the Trust could see, the Cleish Hills provided the same kind of validations. Fife Council has declared the areas on the south side of the Cleish Hills as an LLA and there can be no justification for PKC changing that. Landscape does not stop just because someone drew a Line on a Map. The River Devon Gorge speaks for itself as being unique.

The purpose in writing is to inform you that the Trust will be endeavouring to persuade the Council to amend the Guidance as part of the new LDP2 and include the Cleish Hills and the River Devon Gorge.

Regards,

Alistair Smith, Chairman

Kinross-shire Civic Trust



moiraandal@balgedie.fsnet.co.uk

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