

10 April 2012

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

Dear Sir/ Madam,

**PERTH & KINROSS PROPOSED LOCAL DEVELOPMENT PLAN  
CAMPMUIR – COUPAR ANGUS**

We act on behalf of the Harris family who own and farm land at Campmuir, by Coupar Angus. We wrote to you previously in February 2011, in respect of the Perth and Kinross Local Development Plan – Main Issues Report (MIR). We commented that the MIR should allocate land at Campmuir for a modest range of mixed size housing.

We would request that the comments which we made previously are taken forward by the Council and they should reconsider their position in respect of the extension of the settlement boundary at Campmuir to accommodate housing.

Our client's site is found within the Strathmore and the Glens Area and land within our clients' ownership is delineated on the attached plan.

We are in disagreement with paragraphs 9.1.10 and 9.1.12 of the Proposed Local Development Plan, which seeks to concentrate the majority of development within the principle settlements of Blairgowrie and Rattray, Alyth and Coupar Angus. Furthermore, the Council's position that within the small settlements, the boundaries are drawn tightly to limit further development opportunities.

It is considered that Campmuir would be better to be extended 'internally' and our client would like the Council to consider for future development an area of land on both sides of the Burrelton/ Abernyte Road for residential development.

As mentioned in our previous representation there is no desire of our client to sell their land to outside developers who have no consideration for the present or future inhabitants of Campmuir. They would rather put in place a plan to leave this part of Campmuir more open with the possibility of widening this part of the through road from Burrelton to Abernyte and allow for new houses to be built back from the roadside thus allowing for a pavement and possibly a cycle track especially opposite the junction with the Coupar Angus Road which is considered 'blind' for motorists coming from the Coupar Angus direction.

Of the proposed development sites at Campmuir which were brought forward for consideration in the MIR, it is considered that these would represent sporadic development without any thought being made for the provision of road widening and pavements. Many walkers, cyclists and local residents use the roads through Campmuir for leisure purposes and have to contend with heavy lorries, buses and tractors on a relatively narrow road.

It is considered that a failure to allow for modest development as part of an approved plan in Campmuir over the lifetime of the plan is likely to lead to ad hoc applications for individual houses as there is clearly demand for new housing in Campmuir.

## Conclusions

Our clients control land which is considered to be suitable and appropriate to accommodate residential development.

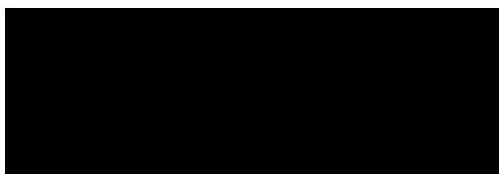
There is a desire, and demand, for existing residents to remain in Campmuir and new residents are attracted to this area. It is imperative that there is a supply of housing that varies in sizes and cost, to accommodate this demand.

It is submitted that the Council should reconsider their position in respect of limiting development opportunities within smaller settlements.

It is our understanding that the Council may bring forward some windfall sites for residential development through the Local Development Plan period and it is considered that our client's land could be incorporated into this.

We trust that the above and attached will be given due regard in the local plan process. Our clients would welcome early discussions with the Council to further discuss the terms of their objections. Should you wish to discuss or clarify matters at this stage, please do not hesitate to contact me direct.

Yours faithfully



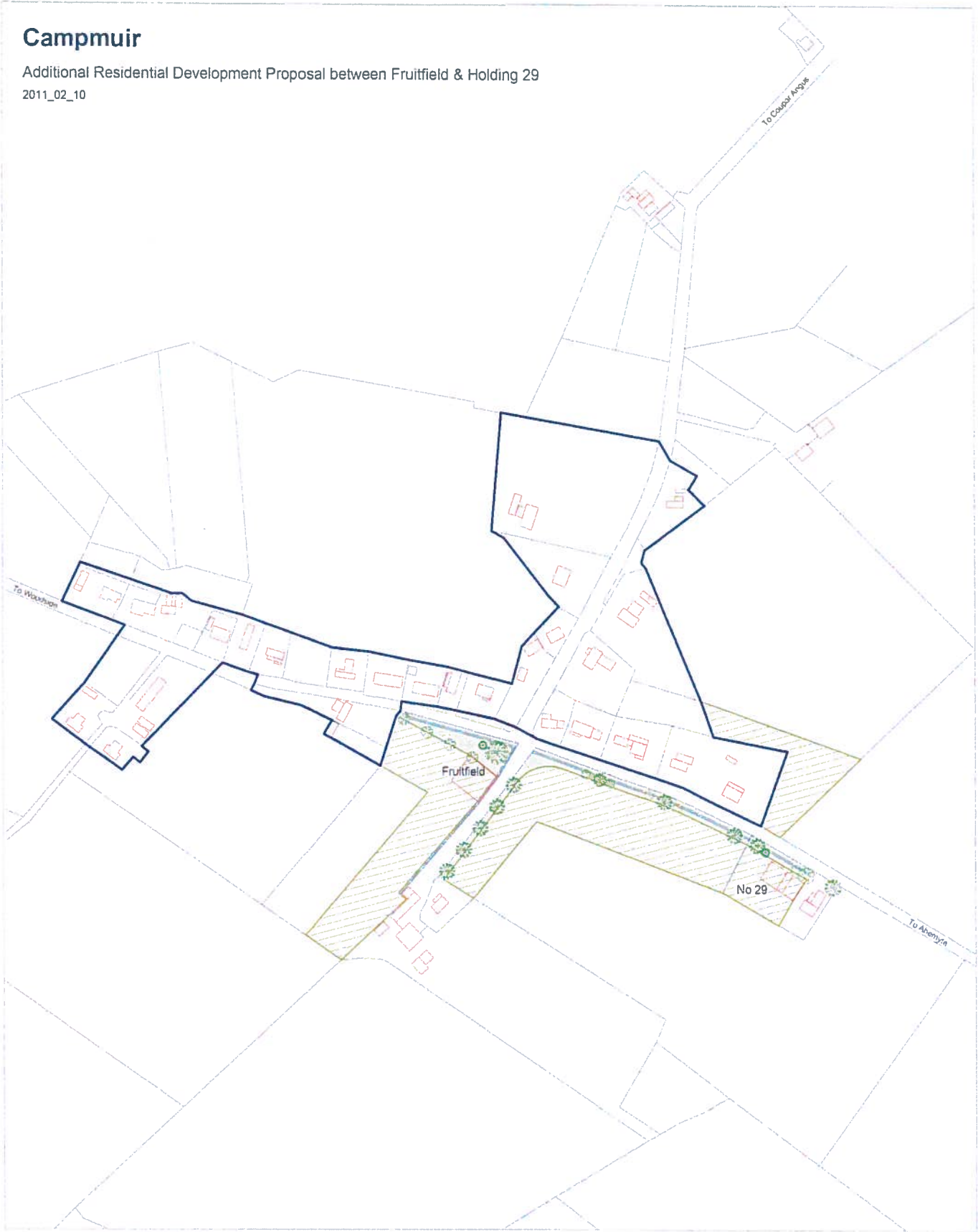
**Alan Fitzpatrick MRTPI**  
**MONTAGU EVANS LLP**

Email: 





Enc.

Campmuir

Additional Residential Development Proposal between Fruitfield & Holding 29  
2011\_02\_10



KEY

- |   |   |   |  |
|---|---|---|--|
|  | AREA PROPOSED FOR RESIDENTIAL DEVELOPMENT |  | EXISTING BOUNDARY OF PERMITTED DEVELOPMENT |
|  | PROPOSED PUBLIC GREEN STRIP               |  | EXISTING BUILDINGS                         |
|  | PROPOSED PUBLIC FOOTPATH                  |   |  |

Scale 

**Dear Sir / Madam**

This document is the formal submission from the Friends of The Ochils on the proposed PKC Local Development Plan and has been submitted by the Chairman Stuart Dean - contact details: Viewfield, Muckhart, Dollar, FK14 7JN, telephone [REDACTED]. The Friends of The Ochils submitted a detailed response to PKC on 11 February 2011 on the Main Issues Report.

Before making representations on specific Policies we would make the following general representations.

1. As noted in the Proposed LDP, much of the Supplementary Guidance is still to be prepared and made available to the public. We are particularly concerned that this Guidance needs to be in place before the LDP goes live and replaces the existing Local Plans. If this Guidance is not in place by then there will be a planning vacuum in relation to key issues and we are concerned that this will have an adverse impact on the Ochils. We seek specific assurance that the LDP will not go live until all Supplementary Guidance is in place.
2. Geodiversity is an important a feature of our landscape and as such warrants appropriate protection, yet there is little more than passing reference to it in the LDP and it does not feature in the Glossary (nor indeed does Geomorphology). We request that a specific review be carried out as a matter of urgency to ensure that geodiversity is adequately addressed.
3. We are concerned that the Ochils do not get a mention in the LDP or the Supplementary Guidance. The Ochils are a vital recreational resource for the whole of Central Scotland and beyond, visited by tens of thousands of people each year. They also provide a stunning backdrop to the everyday lives of local people, whilst tourists who drive past and through the Ochils enjoy the very accessible, dramatic and beautiful scenery. This begs the question as to why the Ochils are not specifically referenced in the do not get a mention. These hills deserve protection and the LDP, which will be in place for many years to come, is the ideal place to initiate the provision of that protection, and indeed, unless the LDP provides the necessary protection, the Ochils will be seriously exposed to many risks. These risks include, but are not limited to, an excessive number of wind farms, overhead power lines, quarries, failure to adequately protect core paths from excessive wear and tear by cyclists and horses, etc. We urge PKC to reconsider its position as regards the Ochils and enshrine protection for them in the LDP and related Supplementary Guidance. We request that this must be done in conjunction with the other two Local Authorities whose boundaries also include a part of the Ochils - Clackmannanshire and Stirling. We also urge PKC to avoid repeating a situation where, even within PKC's boundaries, different parts of the Ochils are inconsistently classified – at present the Ochils within Kinross are designated as an AGLV whilst the Ochils within Strathearn are not! A longer term goal for PKC and the neighbouring Councils of Clackmannanshire and Stirling should be to achieve a high level designation for the entire Ochils, such as Regional Park status.

## Representations on specific Policies.

### 1. Policy NE1: Environment and Conservation Policies

The policy refers to "... a site designated..." however there is no reference here as to how a site is to be designated? We ask that PKC modify this policy to make it clear as to how a site will be so designated.

### 2. Policy NE3: Biodiversity

The Note at the end of this policy is incomplete; as such it is not possible to meaningfully comment on it?

### 3. Section 3.9 The Natural Environment - not withstanding our comments above (NE1 and NE3), the policies in this area are generally welcomed. That said we refer again to our general representations at the beginning of this email as regards the lack of specific mention of the Ochils in the LDP. We would be happy to be consulted further in this regard.

### 4. Policy ER2: Electricity Transmission Infrastructure

We note that this policy has been written with the presumption that the expected method of transmission will be by way of overhead powerlines. However in general we do not welcome the intrusion of overhead powerlines on the landscape and therefore support as a minimum the policy that appropriate mitigation should be carried out in environmentally sensitive areas and would regard the Ochils as such an area. Such appropriate mitigation would be achieved by undergrounding power lines in the Ochils. Underground power lines protect the natural beauty of the environment as well as avoiding the disruption, and associated cost, that occurs when adverse weather conditions causes powerlines to collapse.

### 5. Policy ER4B: Minerals and Other Extractive Activities - Supply, Restoration

This policy states "Financial bonds for restoration will be required." We agree with the need for this but believe the policy should be amended so as to state that "**Adequate** financial bonds for restoration will be required." Unless adequate bonds are required and taken the Council has not addressed the risk of a company going into liquidation.

### 6. Policy ER6: Managing Future Landscape Change to Conserve and Enhance the Diversity and Quality of the Area's Landscapes

In the Note to this policy it states "Until it is possible to assess the acceptability of development proposals against Perth and Kinross-wide Supplementary Guidance on Landscape, priority will be given to safeguarding

and enhancing the landscape of National Scenic Areas. The Tayside Landscape Character Assessment will be used for assessing development proposals, along with other material considerations." We are concerned that limiting safeguards in this way will allow serious damage to the Ochils. The Ochils warrant significant protection and the wording in this policy and the related note should be amended to provide that protection. We also note that The Friends of the Ochils are keen to be involved in providing appropriate input to the Supplementary Guidance on Landscape.

#### 7. Policy ER1: Renewable and Low Carbon Energy Generation

We note that the Supplementary Guidance for this Policy is still to be written and subjected to public consultation. However we believe that it is essential that the Policy and the Supplementary Guidance addresses the risks associated with windfarms below 20 MW as well as those above that level. Supplementary Guidance must not only be applicable to wind energy developments greater than 20 MW. A great deal of damage can be done to the landscape by wind energy developments of less than 20 MW. For example a windfarm of 18 MW could still involve the building of, for example, 9 large 2 MW wind turbines each having the same height as the existing turbines in wind farms such as Green Knowes. Furthermore, there is also a need to protect against a situation where a developer elects to split their applications so that each stays below the 20 MW cut off. Additionally there is also a need to develop a specific policy for turbines erected under the Feed in Tarrff Scheme. Already we have seen an application in the Ochils for an individual turbine with a blade tip height of 79 metres. (Ref 11/00805/FLL) Considerable damage to the landscape will be caused by a number of these individual turbines in an area - it could be as great as that caused by a single windfarm! The Policy and the Supplementary Guidance should address these issues.

Please contact me if you require any further information or input in respect of the above.

Yours faithfully

Stuart Dean, Chairman  
The Friends of the Ochils

Mrs Eileen Thomas  
50 Muirs  
Kinross  
KY13 8AU

(I am happy to be contacted by email)

10 April 2012

To: The Local Development Plan Team,  
Perth & Kinross Council

Dear Sir/Madam

### **Proposed Local Development Plan**

I would like to make the following comments on the Proposed Local Development Plan:

#### **Page 197. Section 7. Kinross-shire Area**

**Suggested Addition: Railway:** I would like to see Perth & Kinross Council state an aim of restoring a railway line through Kinross-shire and a station in Kinross. The population has increased greatly since Kinross Railway station was closed in 1970. Most working people in Kinross-shire are commuters (to Edinburgh, Glasgow, Dunfermline, Perth, Dundee and other places) and this would be a more sustainable transport choice and would reduce carbon emissions.

#### **Page 203. Ref E36 and E13**

I disagree with this land being zoned for employment as it is outwith the town boundary of Kinross, separated by the M90.

#### **Page 205. Ref H46, West Kinross**

I disagree with this site being zoned for housing. It is too close to the M90 and would require the destruction of a local play park to create access.

#### **Page 205. Ref H47, Lathro Farm**

I disagree with this site being zoned for housing. It leaves very little green belt between Kinross and Milnathort.

#### **Page 206. Ref Op10.**

The National Curling Academy project is dead. I **strongly suggest** this site is now removed as an opportunity from the Plan. Since the planning permission for the national curling academy was granted, the Kinross Conservation Area has been enlarged and now includes the Market Park. The Market Park is very important to the setting of Kinross. It is a very

**Comments on LDP from Eileen Thomas, 50 Muirs, Kinross, KY13 8AU.**



attractive feature with a historic past as the location of Fairs and I strongly urge that it is retained as open green space.

**Page 206. Ref Op12. Former High School**

The LDP wrongly states that the former High School is a Listed Building. I suggest using this site for housing or a new Primary School if required.

**Page 207. Ref Op15**

The LDP suggests this site for a potential new Primary School. It seems a pity to use out-of-town prime agricultural land for this. The site is not within easy walking distance of anyone. I suggest saving Op.12 (former High School site) for a new Primary School, or part of E18 (Station Road South).

**Page 213. Section 7.4 Blairingone.**

I suggest identifying more land for housing at Blairingone to help keep the local school open.

Yours sincerely

Eileen Thomas  
(Letter sent as Email attachment)



Perth and Kinross Local Development Plan – Proposed Plan **Representation Form**

**Please read the notes below before completing this form. Completed forms should be returned to the Local Development Plans Team:** [DevelopmentPlan@pkc.gov.uk](mailto:DevelopmentPlan@pkc.gov.uk)

Please complete all 4 sections of the Plan, this will allow us to process your representation accurately and quickly. If you have comments on several documents or parts of the Plan please use separate forms for each.

The period of representation will end at **4pm on Tuesday 10<sup>th</sup> April 2012** and it is essential that you ensure that representations are with us by then.

Your representation will be considered as part of the Local Development Plan preparation process and will be processed by employees of Perth & Kinross Council's Environment Service. Representations and any information you provide (except signatures, email addresses and phone numbers) will be available for public inspection, published online and may be shared with other appropriate professionals and service providers. Under the terms of the Data Protection Act 1998 you are entitled to know what personal information Perth and Kinross Council holds about you, on payment of a fee of £10.

Once we have your representation(s) we will acknowledge them and inform you when the Proposed Plan has been submitted to Scottish Ministers for examination. Scottish Government guidance indicates that representations should be a maximum of 2000 words to provide the Examination Reporter with concise representations that can be resolved through written representations, hearings or a public inquiry as part of the examination process.

### 1. Contact details (only representations that include full contact details are valid)

Name	Ian Gallacher
Address and Postcode	GVA, 206 St Vincent Street, Glasgow, G2 5SG
Telephone no.	[REDACTED]
Email address	[REDACTED]

Note: email is our preferred method for contacting you – if you do not wish to receive correspondence by email, please tick this box: ☐

### 2. Which document are you making a representation on?

Proposed Plan	<input checked="" type="checkbox"/>	SEA Environmental Report – Addendum 2	<input type="checkbox"/>
Supplementary Guidance	<input type="checkbox"/>	SEA ER Addendum 2 - Appendices	<input type="checkbox"/>

If making a representation on Supplementary Guidance, please state the name of the document:

### 3. Which part of the document are you making a representation on?

Policy ref.	<input type="text" value="See attached report"/>	or
Site ref.	<input type="text"/>	or
Chapter	<input type="text"/>	Page no. <input type="text"/> Paragraph no. <input type="text"/>

Perth and Kinross Local Development Plan – Proposed Plan **Representation Form****4. What is your representation?**Are you supporting the Plan? ☐**Or**

Would you like to see a change to the Plan? Please state this change.

See attached report

Please include the reason for supporting the Plan/requesting a change.

See attached report

The Submit button will open an email addressed to the LDP team and attach this form, at this point you will have the opportunity to add text to the email and attach any supporting information.

To submit your form you then have to send the email.

**Save a copy****Print****Submit**



# Report

GVA  
206 St Vincent  
Street  
Glasgow  
G2 5SG

## Kinross Eastern Expansion Area

### David Wilson Homes

Perth & Kinross Local Development Plan – Proposed Plan

April 2012

*Space to live*



David Wilson Homes



**BARRATT**  
DEVELOPMENTS PLC

Prepared By .Ian Gallacher ..... Status..ASSOCIATE .....Date 10 April 2012 .....

Reviewed By Alasdair Morrison ..... Status ASSOCIATE .....Date 10 April 2012 .....

**For and on behalf of GVA Grimley Ltd**

## CONTENTS

1.	Introduction .....	4
2.	Planning Policy .....	6
3.	Proposed Plan .....	11
4.	Housing Land .....	18
5.	Analysis & Conclusion .....	20

## Appendices

Appendix 1	Location Plan
Appendix 2	Masterplan layout
Appendix 3	TAYPlan Proposed Plan representation
Appendix 4	Housing Land Supply table

## 1. Introduction

- 1.1 This report has been produced on behalf of David Wilson Homes and Barratt Homes in response to the Local Development Plan Proposed Plan published by Perth & Kinross Council in February 2012 for public consultation. We submitted representations to the Main Issues Report consultation in February 2011 promoting the subject site for residential development.
- 1.2 This report continues the promotion of the site for residential development, potentially alongside a new education facility for Perth & Kinross Council. We will firstly provide details on the specific site that we are promoting and provide details on the additional supporting information that form this representation.
- 1.3 The subject site lies on the eastern periphery of Kinross, bounded to the east and north by mature tree belts with agricultural fields beyond; to the south by existing residential properties and an area of mature trees; and to the west by Loch Leven Community Campus (see location plan in Appendix 1).
- 1.4 The Proposed Plan identifies the subject site as an Opportunity site for future use as a primary school. This report will focus on the planning policy issues arising from the subject site being promoted for residential development, either in part or whole. We note the Council have accepted the principal of development on this site in allocating the land for a new primary school. Discussions are ongoing between our client and the Council on part of the site being utilised for a primary school.
- 1.5 With regards to the site we enclose the following documents:
- Location plan (appendix 1)
  - Masterplan site layout, including land for new primary school (appendix 2)
  - TAYplan Proposed SDP representation on behalf of David Wilson Homes / Barratt Homes (appendix 3)
  - Housing Land Supply table (appendix 4)

- 1.6 Deliverability is key to the success of any potential residential development site. The reports being submitted in support of this land release all point towards this being an effective site that can deliver housing units within a 5 year time period.
- 1.7 The site is approximately 4 ha in size and is presently used for agricultural purposes. The site is well located to be integrated to the town given the close proximity of the Community Campus, existing public transport infrastructure and other services. We will firstly consider the proposal in respect of existing planning policy.



## 2. Planning Policy

- 2.1 The Development Plan in respect of this site comprises the Perth & Kinross Structure Plan (approved 2003) and the Kinross Area Local Plan (adopted 2004). We will firstly consider the structure plan and any relevant implications for this proposal.

### Structure Plan

- 2.2 The approved plan sets out the broad strategic objectives for the Perth & Kinross area up until 2020. Kinross is located within the Lowland Area in the structure plan where it seeks to promote greater social and economic self-sufficiency and facilitate diversification of the rural economy. Of relevance to this proposal the plan states this will be achieved by:-
- Allocating the majority of new housing land in the larger settlements while promoting opportunities in smaller villages and rural areas;
  - Promoting the provision of affordable housing in areas of particular need.
- 2.3 The structure plan explains that there is a requirement for 9800 households over the period 2000 to 2020 based upon a 3% population growth. We will consider the requirement further later in this report given the time that has expired since these calculations were made.
- 2.4 The plan explains that there is presently a good supply of housing land, with 5000 houses being identified over and above the effective supply. Reference is made to 3400 houses that are presently allocated in local plans which are ineffective and are expected to become part of the effective supply over the period of the plan.
- 2.5 With regards to the Kinross Planning Area there is a requirement for 740 additional allocations in the period up until 2020, with 245 of these to be located in Kinross. The Kinross Housing Market Area is referred to as an area of high demand that should be eased in the future with allocations elsewhere in Perth & Kinross. It is explained that in Kinross the non-effective supply plus the sites coming forward through the Kinross Local Plan review will likely satisfy most of the Structure Plan's requirements up until 2010.

## Local Plan

- 2.6 The Kinross Area Local Plan (2004) will be replaced by the Perth & Kinross Local Development Plan. We note at present the local plan identifies this site under policy 76, Kinross / Milnathort setting, looking to maintain the setting of these towns.
- 2.7 The local plan addresses infrastructure constraints in the area and highlights problems with drainage capacity in Kinross. The plan explains that there is only available capacity for 400 houses in total, albeit this includes other uses to be accommodated also. The plan states that 50% of the capacity should be directed towards housing in Kinross.
- 2.8 In terms of the housing policy in the adopted plan Kinross and Milnathort are the main settlements where the majority of existing allocations are directed to. The plan states there is a sufficient supply of housing land identified through the local plan. It is explained that there is a requirement to deliver 144 additional units through this plan in Kinross for housing based upon the structure plan allocations. This is based upon an effective supply of 31 units at June 2000.
- 2.9 The land immediately to the west of the site is allocated under policy R9, Lethangie – 8.1 ha of new playing fields and associated facilities in respect of the newly built Loch Leven Community Campus.

## Material Considerations

- 2.10 Perth & Kinross Council commenced work on an alteration to the approved structure plan in December 2008 for population and housing figures. This alteration was abandoned in June 2010 following advice from the Scottish Government on the preparation of the new TAYplan (Strategic Development Plan). The abandoned alteration has now been approved as policy guidance on population and households. Some of the headline points from this document are as follows:-
- Kinross has a shortfall of 105 units in the 5 year housing requirement, only 3.5 years is available (based upon January 2010 publication);
  - Kinross Housing Market Area is an area of very high demand and additional land allocations are required to maintain a 5 year supply.

2.11 The guidance states that 210 additional units are required in the Kinross and Milnathort area up to 2012, these are broken down as follows:

- Windfall – 0;
- Non-effective supply – 60;
- New brownfield – 150.

2.12 In our view relying on 60 units to come from the non-effective supply and 150 units from new brownfield sites was not realistic.

### TAYplan – Strategic Development Plan (Proposed Plan June 2011)

2.13 The above document was consulted on last year, our client submitted representations to this on various issues (see Appendix 3). We note the plan is under Examination at present with the Reporters due to finalise their work into objections to the plan later this year. The TAYplan draft is a concise document of approximately 20 pages, with various supporting documents appended.

2.14 Page 17 in the plan provides an annual average build rate for the Kinross Housing Market Area of 70 units per year. This level is linked to the overall contribution of 26,000 units up until 2024 for the TAYplan area to assist in delivering an effective supply. The plan does explain that local authorities can allocate additional land to assist the delivery of these average annual build rates.

2.15 Topic Paper 2: Growth Strategy is one of the seven topic papers that informed the SDP. It is evident from this paper that the SDP does not aim to set exact housing provision figures, rather it identifies a broad scale and distribution of additional housing land for the TAYplan area. In this regard the plan does place more responsibility on local authorities to allocate sufficient land for housing development, as long as this broadly accords with the TAYplan strategy. This flexibility in approach to delivering housing land is referred to in para 5.9 in the paper whereby it states there are several possible areas for flexibility in delivering housing. In summary the following options are suggested:-

- Shift housing provision between neighbouring housing market areas within their authority;
- Identifying more land in some areas to support delivery of an effective land supply.

## Perth & Kinross Local Development Plan – progress to date

2.16 The Perth & Kinross Local Development Plan “Call for Sites” document was out for consultation in early 2011. At this time the subject site was promoted by Kinross Community Council as land that should be retained for recreational / educational use, as it may be required at a later date for expansion of the Community Campus or other similar uses. Our client has subsequently met with the Community Council, their comments were as follows:-

- The site forms a logical extension to Kinross and fitted in well.
- A query was raised on vehicular access arrangements, although this is a detailed point subject to further discussions one member agreed that the development might have a positive benefit in slowing traffic down on this entrance and exit to the town.
- Affordable housing was queried and how this would be provided. It was agreed that David Wilson Homes would provide this in accordance with the Council’s policy requirements, however given the problems with social housing funding at present alternative models to social rented accommodation would have to be considered. The provision of extra care facilities for older people was raised as a specific requirement.

2.17 The Main Issues Report into the LDP was published for consultation in February 2011, our client submitted detailed representations to this document responding to the various questions raised.

## Scottish Planning Policy

2.18 The new Scottish Planning Policy document addresses the issue of Development Plan preparation and the requirement to guide the future use of land and the appearance of cities, towns and rural areas. The SPP states that the process of engagement, information gathering, analysis and assessment is all geared towards the submission of the plan to the Scottish Government.

2.19 In terms of housing the SPP explains that the planning system should contribute to raising the rate of new house building by identifying a generous supply of land for the provision of a range of housing in the right places. The SPP refers to Housing Needs and Demands Assessments as the guide for defining housing supply targets and allocating land in

Development Plans. We note that Perth & Kinross Council has produced a HNDA, we will consider this later in the report.

- 2.20 The SPP also considers housing land and delivery through the Development Plan. It explains that the creation of mixed sustainable communities depends on a generous supply of appropriate and effective sites being available. Allocating a generous supply of land will give the flexibility necessary for the continued delivery of new housing. LDPs should identify the housing land requirements and allocate a range of sites which are effective or capable of becoming effective to meet these requirements up to year 10. LDPs should also provide an indication of possible scale and location of housing land up to year 10.

### 3. Proposed Plan

3.1 We will now consider the relevant sections of the Proposed Plan in respect of this proposal. One of the Key Objectives for the LDP is to provide well designed and built housing with a quality built and natural environment:-

- Accommodate population and household growth and direct that growth to appropriate locations;
- Ensure a continuous 7 year supply of developable housing land;
- Seek to ensure that the housing land supply accommodates the needs of the various sectors of the market and will contribute to creating quality places, the economy and infrastructure.

3.2 We will now address the relevant paragraphs and policies which form this representation to the LDP.

3.3 Paragraph 2.4.5 refers to the TAYplan adopting the Scottish Government 2006-based projections on future population growth. We would refer to appendix 3 where we have objected to this in the TAYplan and instead suggested the 2008 household projections are used. The 2008 figures show a higher increase in population in Scotland and Perth & Kinross. Although house building has clearly slowed in the last few years there is still the same demand for housing as there was pre-recession, the issue is the current restriction on mortgage finance availability. In this regard the LDP should align itself to the 2008 figures to aid the housing market and assist the delivery of units.

3.4 We note paragraphs 2.4.7 and 2.4.8 actually refer to this inherent demand still being intact and the plan should be able to respond to any economic upturn, ensuring that a lack of effective housing land does not become a constraint on general economic recovery. We would suggest the LDP uses 2008 growth figures to assist this.

3.5 **Policy PM3: Infrastructure Contributions.** We object to the wording of this policy in that it does not entirely reflect Scottish Government guidance contained in Circular 1/2010: Planning Agreements. The Circular explains that there should be a link between the development and any mitigation offered as part of the developer's contribution. Planning

- agreements should not be used to extract advantages, benefits or payments from landowners or developers which are not directly related to the proposed development.
- 3.6 In this regard the section of policy PM3 the second sentence should be amended and the part, "...the Council will look at the cumulative long-term effect of new development..." should be deleted.
- 3.7 **Policy RD4: Affordable housing.** Whilst we agree with the principle of a 25% affordable housing policy it is important that reference is made in the policy to the alternative methods of affordable housing delivery available, not just social rented accommodation. The difficulties with funding associated to the social rented market at present should be reflected in a flexible approach to affordable housing delivery in Perth & Kinross as supported by Scottish Government's PAN 2/2010.
- 3.8 In this regard an extra sentence should be included in RD4 at the end of paragraph 3 stating, "...The type of affordable housing provided should be in accordance with the various options in tenure suggested in PAN 2/2010".
- 3.9 Paragraph 4.3.7 has the section in the plan on Housing Land Strategy. We note the figure of 70 units per annum for the Kinross housing market area is included here, as considered in paragraph 2.14 on TAYplan above. The effective housing land supply shortfall is shown as follows for Kinross:-
- Housing Requirement 2010 – 2024, 880 units
  - Effective Supply at March 2011 Audit, 400 units
  - Additional Houses Required, 480 units
- 3.10 With regards to the effective supply of housing units we will consider this further in section 4 when we assess the housing audit and sites included in this document.
- 3.11 Paragraph 4.3.9 in the plan refers to the particularly high level of environmental constraint in the Kinross-shire area. As a result the plan proposes 10% of the housing land requirement for this area to be reallocated to the Perth housing market area. We do not accept the position with this 10% reallocation given it will increase the already high demand within the Kinross HMA and will not address the requirements set out in the TAYplan. This will further exacerbate affordability issues in Kinross and restrict the ability of people and families to access much needed housing. We accept the environmental constraints in the Kinross
-



HMA do make it difficult to allocate land for housing, however this has to be balanced against the present difficulties in delivering housing development and the need to provide a generous supply of housing land.

- 3.12 Paragraph 4.3.10 of the plan states that 10% of the land supply will be met windfall sites. We do not accept that 10% of the overall land requirement will be met by windfall sites. The nature of a windfall site implies that they are not part of the planned housing land supply and arise unexpectedly into the development programme. The former SPP3: Planning for Housing, states that windfall sites should only count towards meeting the housing land requirement once planning permission has been granted for residential development and it is considered to be effective or is being developed. Simply including a standard 10% figure for windfall sites is therefore not appropriate.
- 3.13 Paragraph 7.1.8 in the plan considers Housing in Kinross-shire. As stated previously we will address the effective supply shown as 400 units in the next chapter as this will in turn affect the additional land requirement of 360 shown for the LDP plan period.
- 3.14 In our view the split of houses provided in Kinross / Milnathort should be higher given these are by far the largest settlements and subsequently have the greatest access to existing infrastructure and services. Given the present difficulties with the housing market the majority of new housing developments are being directed to main service centres, rather than peripheral, rural locations. To ensure an effective supply we would recommend a higher proportion be directed to Kinross / Milnathort, in the region of 90%.
- 3.15 Para 7.1.14 provides details on the strategic housing sites for Kinross / Milnathort as follows:-

Sites	Capacity
H46 – West Kinross	125 units
H47 – Lathro Farm	220 units
H48 – Pitdownie	40 units
H49 – Pace Hill	50 units
H50 – Old Perth Road	7 units
<b>TOTAL</b>	<b>442 units</b>

- 3.16 We have considered each of these sites below in terms of the potential for delivery as housing sites within this plan period.

*H46 – West Kinross*

- 3.17 In our view this site is inappropriate for housing release given its location and the constraints that arise from its location adjacent to the M90. It will be very difficult to access this site from either the north or the south due to the existing road layout and potential problems with third party ownership surrounding the site. We have concerns that the noise and associated amenity of any residents in this location would make this site ineffective given the proximity of the M90 and the likely poor urban area that would be created by developing on this site. We understand that no housebuilder is promoting this site and as such we object to this strategic allocation given the uncertainties with delivery.
- 3.18 In terms of amenity for housing, both visually and environmentally, it would be hard to find a site with less quality on the edge of Kinross. The edges of the village are not so constrained as to require the development of such an unattractive site for housing development. Alternatives exist, including our clients site at Lethangie, which present an opportunity to accommodate well designed new housing in a sustainable location which can make a positive contribution to the visual and social wellbeing of the settlement, rather than infilling a field between the motorway and the back of an existing housing estate.
- 3.19 We therefore object to this proposed housing allocation, H46.

*H47 – Lathro Farm*

- 3.20 This is the most significant housing release proposed in the Kinross HMA for 220 houses to the north of Kinross. This site raises significant planning concerns in our view given its location in relation to both Kinross and Milnathort. Firstly, it is likely that the development of this site will cause problems with coalescence between the two settlements. The proposed site is highly visible and any development would represent a significant intrusion into the setting of Kinross and Milnathort and will erode the distinctiveness between the two towns.
- 3.21 The exposed nature of the site on the edge of Kinross at the interface with open countryside, close to Milnathort, is likely to require a significant area of new woodland or other appropriate landscape features to create an appropriate new urban edge which mitigates the visual impact of development on the countryside and coalescence with Milnathort, which is virtually across the road. The effect that this landscape is likely to have on the net developable area of the land for housing means that it is questionable whether 220 houses could in fact be accommodated at Lathro.

3.22 Furthermore, this site is more remote from the town centre, existing services and public transport and will prove more difficult to be integrated given it is simply another “add-on” to a residential area.

3.23 We object to the scale of this proposed housing allocation, H47, although can see some merit in 100 units being considered for strategic development in this location, subject to the appropriate mitigation and landscaping as outlined above.

*H48, H49 and H50 – Pitdownie, Pace Hill and Old Perth Road*

3.24 We will address the Milnathort sites collectively, given they are in close proximity and all have similar constraints. The above three sites identified were in the Kinross Area Local Plan (adopted 2004) as housing development sites previously. The lack of progress to date will be in part due to the downturn in housebuilding over recent times, however these sites were promoted for development well before the downturn in the market. The sites which remain undeveloped are:-

- H8, Pitdownie;
- H10, Pace Hill;
- H31, Old Perth Road.

3.25 These sites account for 96 units of the effective supply in Milnathort, as outlined in chapter 4 of this report. In our view these sites should not be promoted for release given the following general constraints affecting further development in Milnathort:-

- Impact on the landscape setting of Milnathort;
- Impact on existing roads infrastructure in Milnathort, especially roundabout in centre of town;
- Added pressure on services and schools provision in Milnathort.

3.26 In summary, we object to the 97 units allocated for these three sites in Milnathort and as such these should not be promoted through the LDP at this stage.

3.27 Paragraph 7.1.16 in the LDP refers to education provision in Kinross-shire having limited capacity to support future development needs. The level of development identified in Kinross and Milnathort, and existing planning permissions, will require a new primary school.

As explained in the introduction of this report our client's site has been identified as the proposed location for the new primary school.

- 3.28 As explained our client's site is being promoted as a development land for a new primary school, under policy Op15. We note the Council have accepted the principal of this greenfield site being developed through the emerging LDP. Our client is discussing this proposal with the Council, you will note in appendix 2 we have left approximately 3.6 acres for a new twin campus primary school. The remainder of the site is shown with a housing development incorporating access, roads and open space.
- 3.29 In this regard we support the allocation of the site in part under policy Op15, with regards to the land identified in appendix 2 for a primary school. However at the same time we object to the remainder of the site being allocated Op15 and would suggest this is instead promoted as a residential development site.
- 3.30 Given the problems associated with the other two sites being promoted in Kinross at present it is our view that the subject site has the ability to deliver a residential development within the required timescales for housing land delivery. Our client's site has the potential to be developed in a manner that utilises the existing topography of the site and mature treebelt to the east to ensure an enclosed and appropriate development. Our client's site is in a much improved and more sustainable location than H46 or H47 above given it has direct access to the community campus, is only 10 minutes walking distance from the town centre and has ready access to the existing public transport routes in Kinross.
- 3.31 Our client's site is required to provide a sustainable, mixed use development including the new primary school campus and residential development. Given our client's ownership interest in the site it is evident that this land is crucial to the delivery of the new school in this the preferred location. The site can take advantage of the existing facilities in the Kinross Community Campus and can form a sustainable extension to the settlement boundary alongside the residential development.
- 3.32 A key component of housing development is deliverability, ever more so now given the problems with the availability of finance and funding for housebuilders in this market. David Wilson Homes / Barratt Homes are in a position to develop this site in a 2 – 3 year period to provide predominately family housing in the LDP plan period. The site can be delivered in relation to:-

- Drainage – Our client has completed a local services analysis and we note that Scottish Water have a solution proposed for upgrading the mains in the area in the next 12 – 18 months. Our client’s engineers, EFL Consulting, have been discussing this site with Scottish Water regarding ongoing development of the proposed new relief foul sewer that is intended to provide new foul drainage capacity for Kinross. We are advised by Scottish Water that the new sewer will provide much needed foul sewerage capacity for the existing overloaded system, and the design includes for additional capacity to serve future development in Kinross.
- Access – The site will be accessed from a new junction on the unclassified road into Kinross as shown on the Masterplan layout in appendix 2. Although subject to detailed design this new junction will act as natural traffic calming for vehicles coming into Kinross from the east.
- Marketability / Delivery of units – From market testing that David Wilson Homes have completed there is a requirement for family housing in the Kinross HMA. As explained above this site can contribute to the housing land requirement for the HMA within the plan period.
- Education – We note the proposals for the new primary school on part of our client’s site and look forward to discussions continuing with the Council on this matter.

3.33 Following the opening of the Loch Leven Community Campus it is our view that the site at Lethangie offers the best opportunity for a sustainable expansion within the Kinross/Milnathort area. This site can be easily integrated with the existing Kinross settlement given the surrounding landform, access to the town and to local services and amenities. Furthermore, the site’s development is essential in terms of the wider area in delivering a mixed use development, incorporating the new primary school campus alongside the residential element.

## 4. Housing Land

4.1 The Perth & Kinross Housing Land Audit (2011) includes the following figures of relevance to the Kinross HMA area:-

Area	Effective Supply	5 year supply
Kinross	72	72
Kinross Landward	235	140
Milnathort	96	32
<b>TOTAL</b>	<b>403</b>	<b>244</b>

4.2 It is not clear why there is an effective supply shown as a higher amount than the 5 year supply. In our view the effective supply should only be the 5 year supply, it is misleading to include the effective number and 5 year supply together. Some of the issues arising from the audit in relation to the Kinross HMA:-

- Significant amount of supply in the landward area shows issues with the delivery in the main settlements of Kinross and Milnathort;
- Amount of supply in landward area should be considered against high demand in Kinross / Milnathort;
- Likelihood of more development activity in Kinross, rather than the landward area.

4.3 The reliance on the Landward area in providing 235 units for effective supply in the Kinross HMA causes a problem in presenting an over supply for this area. By simply relying on the supply outwith the main settlements it is not solving the problems with delivery in the towns and subsequently Kinross and Milnathort should potentially be looked at as a separate from the Landward area.

4.4 As considered above in chapter 3 the housing land requirement for the Kinross HMA is 880 units in the period 2010 – 2024. This assumes an effective supply of 400 units, this is based upon the 2011 housing land audit figures above where the total is 403 (244 five year supply). The effective supply figure should be reduced to 244 units given this is the actual 5 year supply amount.

- 4.5 There is clearly a shortfall in the 5 year effective supply for the Kinross and Milnathort housing market area. It is incongruous to refer to the area having an effective supply of 400 units given the actual 5 year figure is 244. In summary, our client's site should be included as a housing release site as it can deliver to the housing land supply in the plan period. We will finalise our comments on this representation in promoting our client's site in the next section.



## 5. Analysis & Conclusion

- 5.1 In our view the subject site should be identified for housing development in the LDP. Whilst we support the site being promoted for development through policy Op15 this should only relate to a section of the site. The remainder of the site should be promoted as a residential development site.
- 5.2 As explained above part of our client's site is required to deliver the new primary school campus. This is clearly the most suitable and sustainable location for the new school given the proximity to Kinross Community Campus and other services in the town. The site therefore provides an ideal opportunity for a sustainable, mixed use development incorporating the new school and housing.
- 5.3 The five strategic development sites proposed for delivering housing land in the Kinross HMA at present are in our view not entirely appropriate and will not deliver effective sites that can be developed within the plan period. We have summarised the main issues in support of this proposal as follows:
- It is evident from the above that there is a short and long term problem in the Kinross HMA with a lack of effective housing sites.
  - The reliance on new brownfield sites or presently non-effective sites coming forward for development will not assist with the housing land supply problems in the HMA.
  - The Council should not cut the housing requirement by 10% and reallocate this to Perth HMA, this will not assist with the pressures on the Kinross HMA.
  - There should not be a reliance on 10% of sites coming forward as windfall opportunities.
  - 90% of the housing supply in the Kinross HMA should be directed towards the main settlements.
  - The reliance on the Kinross HMA Landward area in terms of effective supply of housing land presents an unbalanced picture of housing land availability within the HMA.

- The land at Lathro to the north of Kinross is not appropriate for 220 units given the issues with coalescence, landscape impact, distance to services and infrastructure and integration with the town.
- The land to the west of Kinross is not appropriate for housing development given the issues with access, noise, amenity and lack of genuine interest from a housebuilder on the deliverability of this site.
- The three sites in Milnathort are inappropriate and unlikely to deliver the scale of houses envisaged given the issues with landscape, delivery of existing sites elsewhere in the town and problems with infrastructure provision.
- The table provided in appendix 4 presents a more realistic view of the housing land supply situation in Kinross HMA and the requirement for our client's site to be allocated as a housing development site.
- Our client's ownership interest in the site is key to the delivery of the new primary school campus, along with the remainder being promoted for residential development.
- Our client's Kinross Eastern Expansion site can deliver housing development in the plan period and is acceptable in terms of marketability; landscape impact; access; drainage; and education provision.

5.4 We would be willing to work with the Council on delivering our client's site as an appropriate education and housing development site. You will note the work we have already completed on the deliverability of the site as a housing opportunity in the attached appendices. We trust this representation assists you at this time and would be pleased to clarify anything further at your convenience.

This representation was submitted with supporting documents, due to size these are unavailable on the website, but are available to view at Pullar House, 35 Kinnoull Street, Perth, PH1 5GD.

Perth and Kinross Local Development Plan – Proposed Plan **Representation Form**

**Please read the notes below before completing this form. Completed forms should be returned to the Local Development Plans Team:** [DevelopmentPlan@pkc.gov.uk](mailto:DevelopmentPlan@pkc.gov.uk)

Please complete all 4 sections of the Plan, this will allow us to process your representation accurately and quickly. If you have comments on several documents or parts of the Plan please use separate forms for each.

The period of representation will end at **4pm on Tuesday 10<sup>th</sup> April 2012** and it is essential that you ensure that representations are with us by then.

Your representation will be considered as part of the Local Development Plan preparation process and will be processed by employees of Perth & Kinross Council's Environment Service. Representations and any information you provide (except signatures, email addresses and phone numbers) will be available for public inspection, published online and may be shared with other appropriate professionals and service providers. Under the terms of the Data Protection Act 1998 you are entitled to know what personal information Perth and Kinross Council holds about you, on payment of a fee of £10.

Once we have your representation(s) we will acknowledge them and inform you when the Proposed Plan has been submitted to Scottish Ministers for examination. Scottish Government guidance indicates that representations should be a maximum of 2000 words to provide the Examination Reporter with concise representations that can be resolved through written representations, hearings or a public inquiry as part of the examination process.

### 1. Contact details (only representations that include full contact details are valid)

Name	Urban Animation
Address and Postcode	22 Westhall Gardens Edinburgh EH10 4JQ
Telephone no.	[REDACTED]
Email address	[REDACTED]

Note: email is our preferred method for contacting you – if you do not wish to receive correspondence by email, please tick this box: ☐

### 2. Which document are you making a representation on?

Proposed Plan	<input checked="" type="checkbox"/>	SEA Environmental Report – Addendum 2	<input type="checkbox"/>
Supplementary Guidance	<input type="checkbox"/>	SEA ER Addendum 2 - Appendices	<input type="checkbox"/>

If making a representation on Supplementary Guidance, please state the name of the document:

### 3. Which part of the document are you making a representation on?

Policy ref.	<input type="text"/>	or			
Site ref.	<input type="text"/>	or			
Chapter	<input type="text" value="5"/>	Page no.	<input type="text" value="145"/>	Paragraph no.	<input type="text" value="5.34 St Madoes"/>

Perth and Kinross Local Development Plan – Proposed Plan **Representation Form****4. What is your representation?**Are you supporting the Plan? ☐**Or**

Would you like to see a change to the Plan? Please state this change.

Addition of a new housing site east of St Madoes to provide for phased growth of the village over the Plan period.

Please include the reason for supporting the Plan/requesting a change.

See attached Representations Statement.

The Submit button will open an email addressed to the LDP team and attach this form, at this point you will have the opportunity to add text to the email and attach any supporting information.

To submit your form you then have to send the email.

**Save a copy****Print****Submit**

## **Representations to Perth and Kinross Council's Proposed LDP :**

### **Land East of Pitfour Castle, St Madoes**

#### **Strategic Considerations, St Madoes and the LDP**

The TAYplan and Proposed LDP place excessive emphasis on very large scale housing development to meet housing need. This has proven ineffective even during the recent era of rapid economic and housing market growth. The importance of smaller settlements and sites in delivering housing at a slower but more consistent rate should be recognised.

The Proposed LDP provides no housing land at St Madoes. This is inappropriate in an era where household size continues to decrease and population growth is expected and is promoted in the LDP. There will be need and demand from an increasing number of families and individuals for housing opportunities in the village, over the plan period. With no new houses being built, people who may have been born and raised in St Madoes will face the prospect of having to leave to find a house. This cannot be acceptable and is unnecessary.

Providing a limited amount of housing land at St Madoes is reasonable and would amount to a sensibly planned approach to the future of the village. This seems the most basic function of the LDP - to provide for clearly evident settlement requirements over the plan period. The ongoing local needs of small settlements is often neglected by development plans, at the expense of the larger housing land allocation required to meet strategic need.

Elsewhere in the Carse of Gowrie, residents are expressing concern at the high number of housing units allocated at their towns and villages. St Madoes has the opposite problem - no allocation at all. The LDP should spread the housing allocation more widely, or add capacity through new sites, to ensure local housing demand can be met.

Allocation of an increased number of deliverable sites would help to ensure house completions achieve the desired rate. St Madoes has proven to be a desirable location for existing residents and newcomers in recent times. The proposed site is unconstrained and can be easily serviced. It provides a realistic opportunity to deliver house completions within the plan period.

By providing for a gradual increase in new housing at small settlements, the LDP can also ensure that an appropriate rate of organic growth is achieved. This would ensure that the character of villages such as St Madoes is respected. The LDP could control the rate of development at the proposed site through phasing requirements. A steady rate of new development is more appropriate for small settlements than a policy of growth followed by restraint - which is indicative of a housing numbers-led approach.

#### **Site Context**

The site extends to approximately 8.75 hectares. It is located at the east of St Madoes and Pitfour Castle. There is a local convenience store in the village (300 metres), a primary school (330 metres) and bus stops a short distance from the site (100 metres). St Madoes has a range of community and recreation/leisure facilities.

It is noted that the site has previously been proposed as a housing allocation by Perth & Kinross Council, reaching the Finalised Local Plan stage. The proposed allocation was withdrawn following comments from Historic Scotland, which expressed concern that development would compromise the setting of the A listed Pitfour Castle.

## Setting of Pitfour Castle

Whilst the site lies within part of the former Pitfour Castle policies, the original design concept for this 18th Century country house has been seriously compromised. Historic Scotland's LDP consultation response (23 April 2010) confirms that Pitfour Castle "was designed as a country house to be seen within the context of an open landscape and to take in views of the hills to the north and river to the south".

The attached Analysis Plan shows the extent of development to the west of the Castle, where St Madoes has expanded. Immediately to the north and east of the Castle, there are significant wooded areas, which now provide enclosure to the Castle and its immediate grounds. A former eastern access road no longer exists and significant development has taken place within and beyond the eastern policies. The policies are not protected by a Gardens and Designed Landscape designation.

Accordingly, the Council's pre-MIR assessment of the site states "whilst the subjects formed part of the former policies of Pitfour Castle, it is the view that the policy lands have been severely compromised by urbanisation in the last 40 years".

Looking more closely at the setting of the building and its original design concept, Historic Scotland (23 April 2010) suggests development to the south or east of the Castle would "have the effect of changing the nature of its historic setting by enclosing the castle within the townscape".

No development is proposed to the south of the Castle, since the building has an open aspect with distant views over countryside and this elevation is a striking feature.



Photograph : The proposals ensure the attractive and open southern aspect is secured.

The setting of the building is far less distinct to the east. The building can barely be seen from this direction, since development beyond the proposed site has now blocked views. The stone wall at the north of the proposed site screens views from the B958.



In addition, there is established woodland and mature trees to the east and north east of the Castle which largely prevents views in towards the property. It is considered highly unlikely that Historic Scotland would promote a campaign to remove this woodland in order to reopen views towards the eastern aspect of the Castle. As a result, only some land east of the northern driveway to the Castle plays any significant part in acting as a setting for the property.



Photograph : Pitfour Castle, enclosed and screened by woodland to the east.

The formal front elevation of the Castle has been designed to face north, sitting at the south side of a courtyard, partly enclosed by other buildings. It appears that the main arrival route may have been from the west, although this has not yet been confirmed. The only remaining fully open arrival route is from the northern driveway, which has a secluded, private character.



Photograph : The secluded, private northern access to Pitfour Castle.

The open field to the west does not read as part of the setting on arrival from this route but there is a lawn with numerous trees in front (north) of the building group which does act as a local setting and the arrival point at the Castle grounds.





Photograph : The wooded lawn to the north of the Castle now acts as the setting for the building.

Existing mature trees and woodland provide clear delineation between the Castle and land to the east over most of this approach route. On the east side of the drive, there is a large area of unkempt hardstanding which may have housed cattle stalls.



Photograph : Agricultural hardstandings to the east, with the Castle beyond, screened by woodland

In view of these points, it can be said that the design concept for Pitfour Castle - a country house seen within the context of an open landscape - is no longer evident. In fact, the building is attached to the eastern edge of St Madoes and largely screened to the east by woodland and development. Only to the south is there any sense of the former grandeur of the design concept.

The character of the setting has been transformed over the years. The original concept is lost. There is an opportunity now to ensure that the southern aspect is protected in the long term and that the local setting is enhanced through new woodland planting, open space and paths.

Historic Scotland (23 April 2010) expressed “significant concerns about development in this location and would prefer not to see the site allocated”. This does not appear to be a conclusive response ruling out the possibility of development. Further discussion with Historic Scotland has not been forthcoming, since it has preferred to restrict involvement to its statutory role as a consultee.

There are a number of design and layout factors which can mitigate against inappropriate impacts on the setting of the listed building and integrate it into a newly enhanced local setting. These are discussed in the following section.

## Site Development Considerations

Landscape, open space and routes can all contribute to an enhanced setting for the listed building. The attached indicative Layout Plan shows a strong landscape framework which resets the site boundary proposed in previous representations so that the southern aspect of the Castle fronts onto a symmetrical field shape. Land at the east of the northern driveway is set aside as open space, which can include appropriate tree planting. The large hardstanding area can be removed, with the existing track retained as a path and cycle route. These open space areas are consolidated through the positioning of SUDS ponds and can include formal and informal play opportunities as required.

Two landscaped open space corridors are proposed to divide the development area into smaller phases. The southern corridor replays the route of the original eastern driveway to the Castle. The northern corridor connects the historic burial ground at the north east corner of the proposed site to the Castle.

Two narrower landscaped open space corridors are proposed at the north and south edges of the site. The northern corridor enables the east-west path along the B958 to be diverted to a safer and more attractive off road route. The southern corridor provides some new woodland planting and a path route at the countryside edge.

New woodland at the east of the site provides a buffer to existing development and extends existing woodland to create a wildlife corridor connecting countryside to the north and south of St Madoes. A series of paths links all these spaces, providing high amenity routes for walkers and cyclists.

It is proposed that houses should front onto key open spaces and countryside wherever possible, including :

- Open space and SUDS pond at west of Phase 1;
- The two landscaped open space corridors dividing the development phases;
- The southern edge of the Phase 3 area, facing south.

The vehicular access to the site is taken from the B958. A reduced speed limit is proposed, since there are existing substandard junctions positioned immediately at either end of the 60mph zone, which is only 350 metres long. The 30mph zones through St Madoes to the west and the linear developments to the east are both much longer than this 60mph zone and it appears incongruous and unnecessary to split these zones over such a short distance. The reduction in the speed limit would aid road safety, with negligible impact upon travel times

A new access on the south side of the road would introduce additional turning and slowing traffic, contributing towards the safe enactment of a reduced speed zone. There would be a need to reduce the height of the listed wall over a short distance to accommodate sightlines. A short stretch of wall could also be set back from the road as necessary. The wall is in a poor state of repair in many places. A full maintenance programme could be undertaken in conjunction with the proposed housing development.

It is understood that all services are available locally and are capable of extension to serve the development.

Local education capacity is known to be somewhat limited. The phasing of development can be managed to ensure that adequate places are available for new households occupying the development. It is anticipated that education contributions will be applicable to all relevant LDP sites.

## Conclusion

There is a pressing need to ensure that the LDP provides deliverable housing sites in areas where there is known demand. The proposed site at St Madoes is an ideal candidate in this respect.

The site meets the needs of St Madoes for an ongoing supply of land to accommodate organic growth of the village and provide local housing opportunities for existing residents and incoming families. It provides for a sustainable approach to the planning of the settlement.

The Council has previously supported development at this site. Negative comments from Historic Scotland have not been explored in detail. The original design concept for the house and its setting has been lost. The proposed development secures the remaining positive features of the setting by protecting the southern aspect and enhancing the sense of arrival from the northern driveway.

The site should be allocated for housing development in the LDP. The layout and design principles set out in this submission should form the basis of the development framework for the site. The LDP might specify a requirement for a development brief or master plan to be prepared in advance of development taking place, should this approach be considered appropriate as a means of ensuring a high quality solution is achieved.

Richard Heggie  
Director  
Urban Animation

For and on behalf of CKD Galbraith and Client.

9 April 2012

This representation was submitted with supporting documents, due to size these are unavailable on the website, but are available to view at Pullar House, 35 Kinnoull Street, Perth, PH1 5GD.

Perth and Kinross Local Development Plan – Proposed Plan **Representation Form**

**Please read the notes below before completing this form. Completed forms should be returned to the Local Development Plans Team:** [DevelopmentPlan@pkc.gov.uk](mailto:DevelopmentPlan@pkc.gov.uk)

Please complete all 4 sections of the Plan, this will allow us to process your representation accurately and quickly. If you have comments on several documents or parts of the Plan please use separate forms for each.

The period of representation will end at **4pm on Tuesday 10<sup>th</sup> April 2012** and it is essential that you ensure that representations are with us by then.

Your representation will be considered as part of the Local Development Plan preparation process and will be processed by employees of Perth & Kinross Council's Environment Service. Representations and any information you provide (except signatures, email addresses and phone numbers) will be available for public inspection, published online and may be shared with other appropriate professionals and service providers. Under the terms of the Data Protection Act 1998 you are entitled to know what personal information Perth and Kinross Council holds about you, on payment of a fee of £10.

Once we have your representation(s) we will acknowledge them and inform you when the Proposed Plan has been submitted to Scottish Ministers for examination. Scottish Government guidance indicates that representations should be a maximum of 2000 words to provide the Examination Reporter with concise representations that can be resolved through written representations, hearings or a public inquiry as part of the examination process.

### 1. Contact details (only representations that include full contact details are valid)

Name	Richard Heggie
Address and Postcode	Director, Urban Animation, 22 Westhall Gardens, Edinburgh, EH10 4JQ
Telephone no.	[REDACTED]
Email address	[REDACTED]

Note: email is our preferred method for contacting you – if you do not wish to receive correspondence by email, please tick this box: ☒

### 2. Which document are you making a representation on?

Proposed Plan	<input checked="" type="checkbox"/>	SEA Environmental Report – Addendum 2	<input type="checkbox"/>
Supplementary Guidance	<input type="checkbox"/>	SEA ER Addendum 2 - Appendices	<input type="checkbox"/>

If making a representation on Supplementary Guidance, please state the name of the document:

### 3. Which part of the document are you making a representation on?

Policy ref.	<input type="text"/>	or			
Site ref.	New Site & H13, Balbeggie	or			
Chapter	5	Page no.	89/90	Paragraph no.	5.6 Balbeggie

Perth and Kinross Local Development Plan – Proposed Plan **Representation Form****4. What is your representation?**Are you supporting the Plan? ☐**Or**

Would you like to see a change to the Plan? Please state this change.

Propose replacement of site H13 with new housing site to east of Balbeggie, or alternatively, addition of this new housing site to provide mix of housing land, in conjunction with opportunity for improved public realm and open space.

Please include the reason for supporting the Plan/requesting a change.

See attached Representations Statement.

The Submit button will open an email addressed to the LDP team and attach this form, at this point you will have the opportunity to add text to the email and attach any supporting information.

To submit your form you then have to send the email.

**Save a copy****Print****Submit**



## **Representations to Perth and Kinross Council's Proposed LDP :**

### **Land East of Balbeggie**

#### **Strategic Considerations, Balbeggie and the LDP**

TAYplan and the Proposed LDP place excessive emphasis on very large scale housing development to meet housing need. This has proven ineffective even during the recent era of rapid economic and housing market growth. Deliverability is crucial and can be supported by providing numerous smaller, deliverable sites.

The contribution towards the TAYplan / LDP strategic housing requirement at Balbeggie lies in the hands of a single developer and the suitability of the site is questioned. It is recommended that the site proposed in this submission should be included in the LDP as the preferred housing site, or in conjunction with the Council's preferred site in order to offer choice and encourage delivery.

The Proposed LDP provides just one housing site at at the west of Balbeggie, to accommodate 100 houses. There are other small scale opportunities which are proposed for inclusion in an extended settlement, off Burnside Road and Green Road but these sites are of a low quality and unlikely to generate significant interest in the current housing market.

The site selection process raises a number of questions. In the pre-MIR site selection process, the Council suggests the site proposed in this submission is 'not compatible with the spatial strategy'. It is therefore excluded from full consideration for inclusion in the Proposed LDP. It is unclear how this conclusion was reached. In particular, the assessment of factors such as landscape visual impact does not appear to have been robust.

For example, the Council's favoured site sits on high ground and will create a prominent new edge at the south west of the village. Screening this edge with a high tree belt would not be compatible with the established character of the settlement, nor would it allow houses on the southern part of the site to benefit fully from passive solar gain. New housing will therefore be prominent in the landscape at the south and west of Balbeggie. This is a high impact site in terms of landscape capacity.

The site proposed in this submission sits low in the surrounding landscape. Whilst it would obviously create a new edge, it will not break the skyline and the entire development will read as an integrated part of the village. Land at the north of the site can be retained as open ground, acting as a setting at the northern approach to Balbeggie.

Meanwhile, land west of Green Road was also deemed by the Council to be incompatible with the spatial strategy, yet this site has been included in the revised settlement boundary indicated in the LDP. This site has an extant planning permission for 8 houses but does not appear to be a site which will prove attractive to the current housing market. Correspondence between the applicant and the Council in late 2011 indicates an agreement that erection of a length of fencing at the site boundary would be sufficient to achieve commencement of development and secure the planning permission in perpetuity. This does not suggest confidence in early delivery of housing on this site.

Providing more options for housing delivery at Balbeggie would help secure house completions at the desired rate. The proposed site is available for development, can be accessed from a number of positions and services are readily available or can be upgraded. It provides a realistic opportunity to deliver house completions within the plan period. The site offers an attractive proposition in the current market.

There is no evidence that the Council has applied thought to the needs of Balbeggie as a community. In allocating 100 new houses, it has identified a site which has been deemed to meet its spatial strategy criteria. These criteria relate only to the site itself. There are no criteria identifying the needs of the

settlement and its ability to accommodate 100 new houses. The Balbeggie settlement proposals page in the Proposed LDP does not include any specific comments on the existing village and how new development might deliver positive change. There is an absence of 'planning' in the Proposed Plan. This is a missed opportunity.

The Council's preferred housing site may deliver new homes and local play or open space facilities but it will offer little else to the village, other than some new customers for the local shop. The site proposed in this submission can offer wider benefits. This is discussed in detail in a later section of this report.

An assessment of the accessibility of the key village facilities in relation to housing site options has been undertaken. The key village facilities are the local shop, and primary school which lie towards the south of the village and the community hall which lies towards the north. The following 'Access to Local Services' plans show these facilities at the centre of 400 metre radius circles. The plans show a blue-edged core area within which all houses have access to these three key facilities at a distance less than 400 metres.

The first Access to Local Services plan indicates that the existing village is almost entirely within the core area. The proposed housing site promoted in this submission, outlined red, also lies almost entirely within this core area.

The second Access to Local Services plan indicates the Council's preferred housing site to the west of Balbeggie. Approximately 70% of the site lies beyond the core area.

The proposed housing site east of Balbeggie has convenient access to all three key local facilities, whilst the Council's preferred site is more distant from the community hall.

In itself, this may not be sufficient reason to alter the proposed housing land allocation in the LDP. However, the LDP presents an opportunity for the Council and others to assess the future needs of settlements and allocate land responsively.



At Balbeggie, there is a clear need to improve the public realm, which is virtually non-existent. The key village facilities are particularly important in this respect. The siting of the facilities and the layout of paths and spaces around them determines the scope to enhance the public realm. There is limited scope at the shop and primary school. However, much could be achieved at the community hall, where the spaces around the hall are presently of a very low quality. The opportunity to create a civic focus and community hub for Balbeggie is discussed later in this submission.

Photograph : Poor quality public space around the community hall.

Equally, there is an opportunity to promote enhancement of the northern part of Balbeggie, where areas on the main street (A94) suffer low amenity as a result of empty or unkempt buildings and sites.



In particular, the former filling station, cafe and convenience store towards the north of the village have closed. Opposite this site, the land around the community hall in of a low amenity and could be greatly improved. Driving new housing towards this end of the village would be beneficial in encouraging investment and pride in the locality. The site promoted in this submission can contribute towards enhanced amenity towards the north of the village.

Should the convenience store, cafe and filling station reopen, the proposed site will be even better placed for access to local important facilities.



Photograph : The LDP should promote enhancements at the north of Balbeggie

## Site Context

The site extends to approximately 6.0 hectares. It is located at the east of Balbeggie. The Access to Local Services plans show the location of the local shop, primary school and community hall. Bus stops are available on the main street in front of the community hall, adjacent to the site. A core path (right of way) follows the western boundary.

The Proposed LDP states a general requirement for on or off-site public space or play facilities. There is no indication that public space or play requirements for Balbeggie have been considered in any depth, nor any suggestion as to what enhancements may be appropriate. The site promoted in this submission is ideally located to enable new public open space and play provision to be linked directly with the existing community hall, which could provide associated changing, toilet and catering facilities. This cannot be achieved at the Council's preferred site.



Photograph : The community hall could act as a hub with open space and public realm improvements

The following Community Hub /Public Realm Opportunity plan illustrates how the proposed site can contribute to public realm and community facility provision in Balbeggie, with the hall at the heart of a civic hub for the village. The Council's preferred housing site is unable to achieve these outcomes, since it can only offer land for small scale, local open space provision, remote from the community hall.



Photograph : The community hall viewed from the proposed access position.

## Site Development Considerations

There are a number of vehicular access options for the site. A new access can be taken from the B953 at the south of the site. This should ideally link with a through route to another new junction at the A94 towards the northern part of the village, close to the community hall. There would be benefits in forming the A94 access to open a first phase of development. This would maximise the potential for early delivery of public realm and open space / play facilities associated with the community hall.

This access could utilise some of the land at the north of the community hall, or could be located a short distance to the north, at the existing access to the stable building immediately north of the right of way.

Direct path and cycleway connections to the village would be easily achievable and a new path could be provided around the perimeter of the development area, in conjunction with new woodland planting and open spaces. There is a culverted burn running under the site and this could be reopened as a natural feature within the housing area. A main path and cycle route through the site could follow the burn, with associated open space and tree planting. A number of direct links could be provided to the existing right of way / core path at the western edge of the site.

These routes and open spaces could form a strong landscape framework within which the housing development can sit. The layout principles are indicated in the Preliminary Development Framework plan at the end of this report.

It is understood that all services are available locally and are capable of extension or upgrading to serve the development. Should a requirement be identified for new sewage treatment facilities, land is available beyond the site boundary to the north and east.

The Proposed LDP indicates that local primary school capacity is not an issue which will prevent development at Balbeggie, subject to satisfactory phasing.

## Conclusion

There is a pressing need to ensure that the LDP provides deliverable housing sites in areas where there is known demand. The proposed site at Balbeggie is an ideal candidate in this respect.

The site meets the needs of Balbeggie for an ongoing supply of land to accommodate organic growth of the village and provide local housing opportunities for existing residents and incoming families. It provides for a sustainable approach to the planning of the settlement, since it provides the opportunity to achieve wider benefits for the village - not just a means of accommodating the development plan's strategic requirement for housing units.

The site should be allocated for housing development in the LDP, either as the preferred option, or in conjunction with the Council's preferred site. The public realm, layout and design principles set out in this submission should form the basis of the development framework for the site. The LDP might specify a requirement for a development brief or master plan to be prepared in advance of development taking place, in order to secure appropriate public realm enhancements. Community engagement should form an important component of the master plan or development brief process. Development can be phased as appropriate (and in conjunction with Council's preferred housing site if both are allocated).

## Richard Heggie

Director, Urban Animation

For and on behalf of CKD Galbraith and Client

9 April 2012

This representation was submitted with supporting documents, due to size these are unavailable on the website, but are available to view at Pullar House, 35 Kinnoull Street, Perth, PH1 5GD.

Perth and Kinross Local Development Plan – Proposed Plan **Representation Form**

**Please read the notes below before completing this form. Completed forms should be returned to the Local Development Plans Team:** [DevelopmentPlan@pkc.gov.uk](mailto:DevelopmentPlan@pkc.gov.uk)

Please complete all 4 sections of the Plan, this will allow us to process your representation accurately and quickly. If you have comments on several documents or parts of the Plan please use separate forms for each.

The period of representation will end at **4pm on Tuesday 10<sup>th</sup> April 2012** and it is essential that you ensure that representations are with us by then.

Your representation will be considered as part of the Local Development Plan preparation process and will be processed by employees of Perth & Kinross Council's Environment Service. Representations and any information you provide (except signatures, email addresses and phone numbers) will be available for public inspection, published online and may be shared with other appropriate professionals and service providers. Under the terms of the Data Protection Act 1998 you are entitled to know what personal information Perth and Kinross Council holds about you, on payment of a fee of £10.

Once we have your representation(s) we will acknowledge them and inform you when the Proposed Plan has been submitted to Scottish Ministers for examination. Scottish Government guidance indicates that representations should be a maximum of 2000 words to provide the Examination Reporter with concise representations that can be resolved through written representations, hearings or a public inquiry as part of the examination process.

### 1. Contact details (only representations that include full contact details are valid)

Name	Yeoman McAllister Architects
Address and Postcode	Waterside Studios 64 Coltbridge Avenue Edinburgh, EH12 6AH
Telephone no.	
Email address	

Note: email is our preferred method for contacting you – if you do not wish to receive correspondence by email, please tick this box: ☐

### 2. Which document are you making a representation on?

Proposed Plan	<input checked="" type="checkbox"/>	SEA Environmental Report – Addendum 2	<input type="checkbox"/>
Supplementary Guidance	<input type="checkbox"/>	SEA ER Addendum 2 - Appendices	<input type="checkbox"/>

If making a representation on Supplementary Guidance, please state the name of the document:

### 3. Which part of the document are you making a representation on?

Policy ref.	8.2.2 & 8.2.4	or
Site ref.	E25	or
Chapter	<input type="text"/>	Page no. <input type="text"/> Paragraph no. <input type="text"/>

Perth and Kinross Local Development Plan – Proposed Plan **Representation Form****4. What is your representation?**Are you supporting the Plan? ☒**Or**

Would you like to see a change to the Plan? Please state this change.

Please include the reason for supporting the Plan/requesting a change.

We would summarise our reasons for supporting the plan as follows:

**8.2.2 Spatial Strategy Considerations**

The new site which has been identified is deliverable earlier, has less visual impact and a larger developable area (up to 8 ha) than that which was previously proposed

The relocation of the employment land from the Development Framework site could facilitate an increased number of housing to be delivered.

**8.2.4 E25 Employment Site**

Any development of the site shall avoid adverse impact on the Scottish Water Waste Water Treatment Works located immediately to the south of the site, specifically avoiding placing any restriction on the works' ability to continue to operate.

We would note that our client and their design team have met with the relevant personnel within Perth & Kinross Council - Planning and the Environment, and Transportation to progress the relevant aspects of the 'Site Specific Developer Requirements'. We would summarise these as follows:

- Flood Risk Assessment - is in progress and the existing watercourse running through the site shall be broadly left as open channel thus enhancing biodiversity
- Transport Assessment - has been undertaken in principle, road junction design and new road network has been agreed in principle with transportation department and included within masterplan
- Landscaping framework, green buffer along Ruthven Water, extend and retain riparian planting - has been discussed with the planning department and included within masterplan
- Links to path network - has been discussed with the planning department and included within masterplan
- Enhancement of biodiversity and protection of habitats - shall be acknowledged within emerging detailed design studies

**This representation was submitted with supporting documents, due to size these are unavailable on the website, but are available to view at Pullar House, 35 Kinnoull Street, Perth, PH1 5GD.**

The Submit button will open an email addressed to the LDP team and attach this form, at this point you will have the opportunity to add text to the email and attach any supporting information.

**Save a copy****Print****Submit**

To submit your form you then have to send the email.



Perth and Kinross Local Development Plan – Proposed Plan **Representation Form**

**Please read the notes below before completing this form. Completed forms should be returned to the Local Development Plans Team:** [DevelopmentPlan@pkc.gov.uk](mailto:DevelopmentPlan@pkc.gov.uk)

Please complete all 4 sections of the Plan, this will allow us to process your representation accurately and quickly. If you have comments on several documents or parts of the Plan please use separate forms for each.

The period of representation will end at **4pm on Tuesday 10<sup>th</sup> April 2012** and it is essential that you ensure that representations are with us by then.

Your representation will be considered as part of the Local Development Plan preparation process and will be processed by employees of Perth & Kinross Council's Environment Service. Representations and any information you provide (except signatures, email addresses and phone numbers) will be available for public inspection, published online and may be shared with other appropriate professionals and service providers. Under the terms of the Data Protection Act 1998 you are entitled to know what personal information Perth and Kinross Council holds about you, on payment of a fee of £10.

Once we have your representation(s) we will acknowledge them and inform you when the Proposed Plan has been submitted to Scottish Ministers for examination. Scottish Government guidance indicates that representations should be a maximum of 2000 words to provide the Examination Reporter with concise representations that can be resolved through written representations, hearings or a public inquiry as part of the examination process.

### 1. Contact details (only representations that include full contact details are valid)

Name	Dupplin Estate
Address and Postcode	c/o Kerri McGuire Savills 163 West George Street, Glasgow, G2 2JJ
Telephone no.	[REDACTED]
Email address	[REDACTED]

Note: email is our preferred method for contacting you – if you do not wish to receive correspondence by email, please tick this box: ☐

### 2. Which document are you making a representation on?

Proposed Plan	<input checked="" type="checkbox"/>	SEA Environmental Report – Addendum 2	<input type="checkbox"/>
Supplementary Guidance	<input type="checkbox"/>	SEA ER Addendum 2 - Appendices	<input type="checkbox"/>

If making a representation on Supplementary Guidance, please state the name of the document:

### 3. Which part of the document are you making a representation on?

Policy ref.	<input type="text"/>	or			
Site ref.	<input type="text"/>	or			
Chapter	<input type="text" value="5"/>	Page no.	<input type="text" value="148"/>	Paragraph no.	<input type="text" value="5.36"/>

Perth and Kinross Local Development Plan – Proposed Plan **Representation Form****4. What is your representation?**Are you supporting the Plan? ☒**Or**

Would you like to see a change to the Plan? Please state this change.

Dupplin Estate supports the principal of extending the settlement boundary of Tibbermore. However, it is requested that the settlement boundary of Tibbermore is further extended to the south to accord with the site boundary shown on the attached plans.

Please include the reason for supporting the Plan/requesting a change.

Please refer to the attached letter and supporting documents.

The Submit button will open an email addressed to the LDP team and attach this form, at this point you will have the opportunity to add text to the email and attach any supporting information.

To submit your form you then have to send the email.

**Save a copy****Print****Submit**

5 April 2012

12 04 05 PKC Tibbermore Proposed Plan Reps Final.docx



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

Kerri McGuire  
 [Redacted]

163 West George Street  
 Glasgow G2 2JJ  
 [Redacted]

savills.com

Dear Sir or Madam

### **Perth and Kinross Proposed Plan – Local Development Plan Land at Tibbermore**

We write on behalf of our client Dupplin Estate in relation to the Perth and Kinross Proposed Plan. This letter provides comments on the proposals and policies relating to the village of Tibbermore.

### **Perth Area Spatial Strategy – Tibbermore**

The spatial strategy states that Tibbermore is a small village the currently does not possess any amenities. The spatial strategy does not identify any additional housing sites within the village but has extended the settlement boundary to the south of the minor road to allow for some limited roadside development and to the north to allow some further development to complement the existing village.

We support the principle of the extension of the settlement boundary to the south. However, we request that this settlement boundary is further extended to the south, to correspond to the site area shown on the enclosed plans. The enclosed Indicative Site Layout shows a site area of 4 hectares. This area allows for the provision of a residential development within a high quality landscaped area. There are also opportunities to create paths through the site and the inclusion of a play park and affordable housing. These facilities cannot be accommodated within the area currently allocated to the south of the minor road in the Proposed Plan. The Proposed Plan recognises that Tibbermore currently does not possess any amenities. The allocation of the larger site would allow for the provision of local amenities such as a play park.

Policy PM1A: Placemaking in the Proposed Plan states that proposals should incorporate new landscape and planting works appropriate to the local context and the scale and nature of the development. The allocation of the 4 hectare site would allow sufficient land to provide a high quality landscaped setting for the proposed new residential units. This area would also allow for planting to be provided on the site.

The 4 hectare area reflects and complements the scale of the existing residential properties at Tibbermore on the opposite side of the minor road.

### **Effective Housing Site**

Paragraph 55 of PAN 2/2010: Affordable Housing and Housing Land Audits establishes the criteria for assessing the effectiveness of a housing site.





The criteria for assessing the effectiveness of a site are as follows:

- Ownership
- Physical
- Contamination
- Deficit funding
- Marketability
- Infrastructure
- Land use

Assessing each of the criteria in turn it can be demonstrated that the land at Tibbermore is an effective housing site. The site is fully within the ownership of Dupplin Estate. The site is clear of any physical constraints and the Site Assessment for Site 777 stated that there are no known flooding issues at this location. The site can be accessed either from the roads to the north and west of the site. The site has no contamination issues. No public funding would be required to make the development economically viable. The site can be developed within the plan period. The site is free from infrastructure constraints. In terms of land use, the inclusion of part of the site within the settlement boundary of Tibbermore demonstrates that housing is the preferred use for this land.

The site is currently used as agricultural land. The land is not prime agricultural land and is Macaulay Institute category 3.1 and considered capable of producing a moderate range of crops. The site forms a natural extension to Tibbermore and is capable of being delivered during the plan period. It is considered that there will be market demand for the proposal given the close proximity to Perth and the attractive rural location. There is an existing bus stop located at the crossroads which demonstrates that the site can be easily accessed by public transport and is well connected to the surrounding settlements.

This site was promoted at the Call for Sites and Main Issues Report stages. Perth and Kinross Council's Site Assessment (Site 777) identified that there is an archaeological point of interest on the site. We submitted a Preliminary Heritage Appraisal Report with our representation at the Main Issues Report Stage. We have enclosed a copy of this report. The Preliminary Heritage Appraisal concluded that as the site is currently in agricultural use and has been cultivated and ploughed, it is likely that any archaeological potential at this site will be limited to sub-surface deposits. It is extremely unlikely that any remains found at this location would require preservation in situ. It is likely that any remains found would only rate as of local interest and would therefore not prevent development at this location. The archaeological point of interest identified at the site in the Site Assessment is therefore not a constraint on the site.

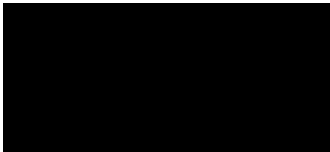
The allocation of a larger area to the south of Tibbermore will assist Perth and Kinross Council in maintaining a 5 year supply of effective housing land.

We therefore request that the settlement boundary of Tibbermore is extended to the south to incorporate the 4 hectare area shown on the enclosed plans. We trust that the above and enclosed will be taken into consideration in the preparation of the Local Development Plan.



Should you have any queries or require any additional information, please do not hesitate to contact me at the telephone number above.

Yours sincerely

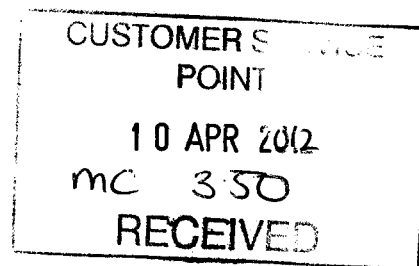


Kerri McGuire  
Associate

Enc.

This representation was submitted with supporting documents, due to size these are unavailable on the website, but are available to view at Pullar House, 35 Kinnoull Street, Perth, PH1 5GD.

Turfhills House  
Kinross  
KY13 0NQ



8th April 2012

Perth & Kinross Council  
Development Planning  
Pullar House  
Perth PH1 5GD

Dear Sir/Madam

**Objections to the Perth & Kinross Council (PKC) Local Development Plan (LDP)**

I am a resident of Kinross for over 30 years, am an executive member of Kinross-shire Civic Trust for over 20 years and remain an active in community matters. I have engaged in several Planning Inquiries which have rejected some highly inappropriate schemes.

The Proposed plan in its current form continues to encourage a pattern of ill-conceived and ultimately unsustainable development.

There appears to be little recognition of the need to protect and sustain the best asset of Kinross-shire, being Loch Leven and environs, in order for instance to assist and expand established Tourism, a sustainable and major employer.

A vision based on a concept of real need and genuine requirement is lacking in the LDP. The plan also includes vague, misleading statements and errors. I therefore wish to give notice of my objection to the proposed LDP.

**The PKC Development Plan Scheme** page12 states:

**“The MIR is seen as the most important stage in the plan-making process when everyone can become effectively involved in shaping the final content of the LDP; therefore an extensive public consultation exercise will be undertaken once the MIR has been published.”**

It would seem essential that the Main Issues Report (MIR), itself following on from a pre-MIR consultation, should give a true reflection of just what the public were being asked to formulate their representations on.

I believe in specific cases a true agenda of intent was concealed as the LDP has now, quite literally, moved the boundaries beyond recognition.

For instance The MIR p124 includes a map which identifies **site B (Ref KM 1)** as a “potential employment site”. The site boundary identification is vaguely hatched and p.122 at 5.4.17 refers to: **“Land at Turfhill, approximately 5 ha (Site B)”** and gives no indication as to intent to include the **15.3 ha** now included in the LDP.

2.

Also MIR p.123 Q40 invites the answer to:

**“Do you agree with the proposal to meet the employment land requirement by identifying land at Turfhill and South Kinross.**

By parcelling the two sites together in this way an invitation is being offered to accept a site at Turfhill that is not legitimate in planning terms and history, with a legitimate site at South Kinross which lies within the accepted Kinross settlement.

**As a result I see these points as misleading and indicating a flawed process to date.**

**LDP :Housing Page 198, 7.1.12.** claims a “community based group.... developed a Long Term Development Strategy focussing on Milnathort/Kinross and the Fossoway Area.”

The community based group is not identified and I understand Kinross was not included in this study.

**Can you please advise me of the group name and supply evidence of Kinross being included in the Strategy?**

Figures proposed for Housing “requirement” and “need” for Kinross-shire appear to be based on 2006 statistics. This point was nearing the tail-end of an unsustainable and undesirable period of growth. The consequence of this pattern is an abrupt and very likely long-lasting halt with long-term negative implications.

For PKC to base future “requirement” on such a distorted and undesirable growth trend and portray this as an established “need” is disingenuous.

**Are the 2006 figures the most recent data available to base future growth?**

Justification for Employment Land provision is unconvincing.

Last Thursday April 5<sup>th</sup> I spoke with Brenda Murray, member of PKC Forward Planning in order to establish how the figure being put forward as Employment Land “need” in the Kinross/Milnathort area was arrived at.

She advised me that PKC were not obliged to share this information with the public at this time in the LDP process.

On reflection I find her statement odd.

**Without the statistics which establish how PKC arrive at Employment Land requirement how can a member of the public assess the LDP?**

**Can you please confirm that her advice was correct or otherwise?**

**The Kinross Area Local Plan 2004 p19 The Local Economy: Employment Land 5.25 states:**

**“In order to comply with the Structure Plan requirement for 19.6 ha of business/industrial land the council will undertake a search to identify a minimum of 3ha further industrial land.”**

3.

**The MIR p122 Economic Development Land at 5.4.17 states:**

“The amount of land available in the short term is 11.16ha and with a requirement for 20ha of land to 2024 this leaves a requirement to identify 9ha of land capable of being brought forward during the life of the Plan.”

**LDP p197 table at 7.1.6.**

The table illustrates a total listed as 32.3ha of Employment Land.

By excluding sites E36 and E17 at Turfhill a figure of 17ha remains.

Several other more suitable and legitimate sites can supply any shortfall if required.

**LDP p197 at 7.1.5 states**

“Opportunity Sites suitable for higher quality Employment Land exists at Stirling Road and Kinross Auction Mart.”

Identification by their map titles is omitted. The plan should clearly state “Stirling Road Op16 and Kinross Auction Mart Op 13.

**Otherwise confusion between Stirling Road E19 and Stirling Road Op 13 is possible.**

**Op 16 (p.208) Stirling Road identifies 3.8ha.**

Uses. Employment use and residential on no more than 75% of site.

**Op 13 (p207) Kinross Auction Mart identifies 3.7 ha.**

Uses. Employment and high density residential on no more than 50% of the site.

**Both of these statements of Uses has at least two potential interpretations and as such are misleading.**

**Either way both sites offer Employment Land yet neither site are included in the Employment Land figure. Why?**

**I object to both of these potential Employment Land Sites being used for any housing as long as the Turfhill sites E17 & E36 remain in the LDP.**

Land at Milnathort bounded by the M90 Motorway and stretching between H48 and E19 has been omitted from the LDP yet is adjacent to existing Employment Land.

I identified these potential sites in my MIR response.

This area could deliver around 8ha of Employment Land and still include a woodland buffer to the M90. This site should be zoned for Employment.

**I object to its failure to be included while land at E17 & E36 Turfhill is included in the LDP.**

**Op 14 Health Centre 0.6ha p.207**

This disused and available site does not appear on the Employment Land table (p.197) Why?

**This site with existing building should be reserved for Employment Land only.**

4.

**Op 15 Lethangie 3.5 ha**

I consider it a poor choice for a Primary school as it would encourage car use due to location. Having a Primary located immediately alongside a Secondary School is also questionable in terms of suitability.

**This site should be included for Employment Land in preference to the E17 and E36 sites.**

**Spatial Strategy Considerations 7.2.2. p.202**

(para.3) "there remains an identified need to improve the retail offer in Kinross, through the provision of a larger format supermarket with a wider product range, close to the town centre."

I would like to know the evidence for this "identified need."?

The term "close to the town centre" is not specific enough and could be interpreted to sanction an out-of town location, west of the M90 boundary for instance.

**The LDP should clearly state the source of evidence for such a facility and specify that it should be located "within the town centre."**

The **Kinross/Milnathort map p.209** appears to include the area at Turfhill as part of the Kinross/Milnathort Settlement boundary.

I object to this inclusion.

**The Kinross Local Plan Inquiry 2003 Conclusions 19 (Ref KM 2)** established that "the M90 provides an effective and defensible barrier to development sprawl."

There has been no significant development in the Turfhill area since which would justify a revision to include land west of the M90.

The granting of redevelopment (**PKC Report 11/00197/FLM**) of the Turfhill Services site is replacing and augmenting an established and legitimate facility. This approval conforms to PKC policy to restrict on-site uses to those in accordance with its function to serve the wider travelling public. (**Ref KM 3**)

**Employment Sites E17 & E36 page 203**

Site E36 is currently in use as a PKC Roads Depot facility and that purpose is an established legitimate need to serve the Motorway Network and serve Local functions.

**The Turfhill Public Inquiry of 1997 (ref P/PP/75/96/TC/4)** refused development at these same sites as now proposed.

Over 1200 objections were lodged against the proposal.

Attached Findings of Fact and Conclusions pages 58-79 (**Ref KM 4**)

The Inquiry conclusions (p.78 12.5) state that development at Turfhill would "significantly compromise the character of Kinross as a compact small town in a rural setting." (p.78 at 12.6) found that the site was "greenfield" and that land (now available with improved access link ) on the east side of the M90 at Bridgend and "with the advantage of better integration into the fabric of Kinross" was (and now is) a potential option to be zoned for Employment Land. Also that "expanding the industrial land supply on the Milnathort side of Junction 7" should be considered.

5.

The Inquiry found (12.4) unsuitable and unsustainable due to being in a location that was **“on the wrong side of the M90 and in particular of junction 6 for integration of transport patterns with the small town of Kinross”** and that **“The combination of speed, complication and unpredictability of vehicle movements at this motorway interchange is not inherently safe for walking or cycling...”**.

That Turfhill, being furthest from the Kinross was (and still is) an unsustainable and indefensible choice that would **“encourage both local short car journeys and because of the relatively small population of the Kinross area, longer-distance commuting by car”**, contrary to National Policies.

Evidence at the Inquiry (submitted by the applicants agents and the Heatheryford owner) confirmed that the Turfhill site had been the subject of sand and gravel extraction and had been also used for general waste dumping purposes.

The nature of these materials poses problems which would make the E17 site unsuitable for development purposes without major expense to identify and remove contamination and investigate soil stability issues.

The land was re-instated to Greenfield at great expense and is productive farmland

The Turfhill Inquiry further established that the water table was very high, which would result in making the land unstable and unsuitable for development purposes.

The Inquiry recognized that the waterlogged ground would also make any attempt at introduction of mitigation measures ineffective.

**(11.2.6 p.59) “newly planted trees in the area of Turfhill are surprisingly liable to complete failure and slow growth if they survive at all.”**

due to **“excessively free-draining sand and gravel subsoils, exacerbated by a generally high but variable water table resulting from the excavation of higher deposits.”**

**(11.2.7 p.59) “These conditions severely stress young trees in dry summers and inhibit the establishment of a sound root system in many species.”**

**Therefore p.202 LDP 7.2.2 Turfhill phase 2 an “appropriate landscape framework” is unachievable.**

SEPA identify the area of the sites being considered as being at risk of flooding from adjacent watercourses.

There is no adequate mains drainage or sewerage available to serve these proposed sites.

**The Kinross Local Plan Inquiry 2003 assessed these sites under Topics 35.1 and 35.2 (pages 125-133) (Ref KM2)**

The Inquiry confirmed the M90 motorway to be an effective and defensible barrier to development sprawl.



6.

The Inquiry specifically rejected the inclusion of these same sites due, amongst other issues, to their inappropriate location due to it being out of town and at the farthest point from the majority of residential areas for safe and suitable access by potential employees.

The 2003 Inquiry fully concurred with the Findings and Conclusions of the 1998 Inquiry in finding that these sites were divided from the town by a busy motorway intersection with fast flowing traffic which provided a series of hurdles to employees in Kinross. The Inquiry established that the uses established at the Council Yard and Turfhill Motorway Service Area was of explicit use ancillary to the M90 motorway.

The 2003 Inquiry pointed out that more likely suitable sites remain undeveloped or unidentified within the Kinross and Milnathort boundary.

This situation remains unchanged as there are several sites, including brownfield, suitable for economic development purposes, east of the M90 boundary and within or immediately adjacent to, the Kinross and Milnathort settlements.

The Inquiry confirmed that the Garden Centre was approved only after a Public Inquiry in 1986 established that such an operation was suited to such a countryside location. The 2003 Local Plan Inquiry concluded that the site could not be justifiably included as part of the Development Envelope of Kinross and was part of the Landward Area.

The Inquiry stressed that there was no legitimacy in breaching the town boundary clearly defined by the M90 corridor which provided a defensible barrier to urban sprawl.

The Grouse and Claret Restaurant at Heatheryford and Turfhill House, a Listed Building, are both established local Hospitality businesses which rely on a pleasant location to attract and sustain custom. Any designation of adjacent land to commercial/industrial use would spoil their attractiveness and damage their viability.

Kinross Community Council (KCC) has made submissions in support of use of land at Turfhill and their minute states their understanding that “**1500 jobs**” would be created. KCC have an established history of failing to adequately seek and express the views of the community they are obliged to represent. (Ref KM5)

I believe the survey conducted by KCC and submitted with their representation at the pre-MIR was partial and flawed in concept, design and interpretation and was based on a very small, anonymous sample of respondents to vague and meaningless questions.

Expert opinion and Findings of Fact and Conclusions of the 1998 and 2003 Inquiries into the land use in the Turfhill area, being the result of assessment measured against National Planning Policies and Guidelines concluded there was no justification to include these sites for Employment Land development. There have been no significant changes that could alter that assessment.



7.

**Op 11 Turfhill Motorway Service Area (page 206)**

This 5ha site is now providing a significant potential supply of Employment Land specifically as an “improvement of existing motorway service area with element of tourism related retailing”

The grant of planning approval on 22nd June 2011 PKC Ref 11/00197/FLM has a more than doubled the retail area to 2230 sq metres. (Ref KM3)

This will provide goods and services to the wider travelling public and creates jobs. (PKC Committee Report para 125) states:

**“Generation of approximately 115 new employment opportunities through new retail development”**

This development and potential for additional Employment Land related to tourist retailing is omitted from the total of Employment Land available calculation. Why?

Land immediately west of Junction 6 and to the north of the A977 identified as Employment Land was dealt with in the **Local Plan Inquiry 2003 (Topic 36 pages 134-139)**

The Inquiry clearly stated that the Motorway Services Site was specific and limited serving the purpose of a motorway fuelling stop and other directly associated and legitimate purposes pertinent to that function.

The Inquiry conclusion was that there was no justification in extending the Development Envelope of Kinross to include this site for other purposes and that the Turfhill area was not by appearance or character a part of the urban area of Kinross.

Options continue to exist to connect this site directly to the Northbound M90 slip by provision of a short extension to an existing onsite spur thereby reducing the pressure on the A977 entrance/exit to the Motorway Services site. This has been ignored.

**Site H46 p.205**

I object to the proposed use instead, due to its proximity to the M90 and its position adjacent to existing housing land, it is well placed to provide employment land to a total of 8ha.

This site provides the opportunity to deliver truly sustainable Employment Land. It benefits from being within the town boundaries. This site could serve the “identified need” PKC claims to exist for existing local business expansion and aid start-up facilities. A cycle and pedestrian access exists and as such could deliver options of sustainable and safe access to employment. It provides a suitable location to create environmental benefits by planting screening along the M90 with opportunities for Community Woodland as part of a planning brief.

**Op 12 Former High School site** could offer 2.95 ha of Employment Land with units for Employment suited to this centre town location.

I object to proposals to include the site for housing.

8.

**LDP Op 10 Market Park p 206**

The site should be reserved solely for Open Space as it enhances and compliments the streetscape and character of the Conservation Area.

I object to proposed uses

**LDP p.60 Policy EP 13 Airfield Safeguarding**

**I object to Balado Airfield being included as its validity as an Airfield is questionable.**

There is no legitimate justification for such excessive levels of proposed Employment Land as proposed, in particular in relation to the inclusion of E17 & E36 Turfhill sites, while other more suitable sites exist as identified in my submission.

The 1997 Planning Inquiry exposed a fraudulent attempt to access a half million pounds of public cash (EU Objective 2 Funding) to develop Turfhill by wrongly claiming the site had planning permission when it had none.

This matter remains outstanding.

Bridgend Industrial Estate remains under-occupied (largely empty and this situation has existed since its establishment in the mid-1970's.

The new link road due to be completed by June 2012 will open up this site and adjacent land for Employment uses.

A custom built storage Unit at David Sands is available being surplus since the recent Co-op takeover who prefer to use other centres for their distribution.

The Kinross Study 1995, produced by PKC being a Draft for the Kinross Strategy, which itself has now been currently revived stated:

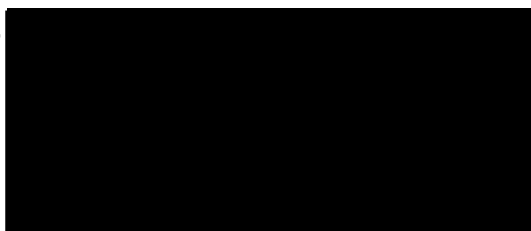
“there is a very weak co-relationship between places of employment and places of residence. It would thus be dangerous to assume that additional local employment opportunities will have a direct effect on either the level of commuting (or indeed in utilising expressed or latent local labour supply).

The Study also provided statistics of the Employment Profile of residents which confirms a workforce which cannot by nature respond to the notion of a self-sustained employment structure no matter how much land is set aside to accommodate that notion.

**(Ref KM 6)**

I consider it an omission that the LDP has been produced ahead of and therefore without the benefit of the 2011 Census Figures which could offer the most up-to-date profile to create a relevant LDP and are likely to be available soon.

Ken Miles Turfhill, Kinross



---

**From:** John Munro [REDACTED]  
**Sent:** 10 April 2012 12:37  
**To:** TES Development Plan - Generic Email Account  
**Subject:** : Draft Local Development Plan Consultation Comments  
**Follow Up Flag:** Follow up  
**Flag Status:** Green

---

From: [REDACTED]  
To: [REDACTED]  
Subject: : Draft Local Development Plan Consultation Comments  
Date: Tue, 10 Apr 2012 11:26:44 +0000

---

scroll down to letter

---

---

---

---

---

---

---

Re Consultation on draft development plan, Comments

.

The proposed strategy for the Perth Area lacks clear rationale. It is unclear how it will further "sustainable development" in its environmental, social and economic aspects, as it claims to do, given that the 2006 Planning Act states that such involves the environmental, economic and social aspects thereof and so extends to the key issues of climate change, energy scarcity and an ageing population..

There should be a generalised "urban structure" plan making clear just how the proposals and policies relate to national and local aims and to strategies for health, education, transport etc. This would not include details needed in the statutory plan and would cover a longer period. Such an approach (called "Inverness Vision") was instigated 15 years ago by the Highland Council and indicated the preferred pattern of change over about 30 years. Why it was not also done by PKC is unknown.

Given that "sustainable development" is partly based on the natural environment of the area it is surprising that the draft strategy pays limited regard to this. There is little reference to landscape/ecology/biodiversity local climate etc. which should be key factors in determining land uses and development densities. The proposed urban form seen little related to these. The right approach would be that envisaged by Professor Ian McHarg and his colleagues, referred to as "design with nature."

The plan uses a "green belt" to encircle the city. This is a simplistic idea from the nineteen-fifties when little was understood about ecology, energy, climate change, the ways in which towns develop, and the inter-dependence of land use and transport. A study by Heriot-Watt University for the Scottish Executive described the many deficiencies of the idea and the alternatives available. Few people understand that "green belts" exist mainly to "contain" cities and facilitate orderly expansion. Boundaries are changed as places expand and more housing land is needed. Belts are not, as often assumed, primarily about conserving landscapes. There are far better ways of doing this, including in some cases promoting low-density building. Planning must address the issues on managing land as well as using it. This strategy does not adequately do so.

The Government now says that "green belts" need not surround towns/cities but can instead be "green wedges" or corridors which would relate much better to natural features. It is not clear why PKC has not heeded this advice.

Government and PKC policies emphasise close relationships between land use/densities and transport with housing being located where there will be good pedestrian, cycle and/or public transport access to places of work, shopping, recreation, education etc. and making better use of existing infrastructure and services.

The strategy does not adequately do this. The allocation for housing to a very large area of land West of the by-pass has no sound basis given its distance from the city centre, its height of much of it with exposure to strong winds. This may raise costs of heating buildings with high costs. Also new road access could cost about 100 millions pounds in public funds. (An officer told me this)

Moreover the large populations to be accommodated in these outlying areas would need new schools, and other community facilities. It is not indicated where these would be located.

Yet the Almond Valley Area which is much more suitable for housing is not to be used for such, against the advice of officials.

Also, hard to understand, is the large allocation of housing land North of Scone.

A far more sensible strategy would be to provide for much more housing East of the Tay and South of the latter, where costs would be much lower, the environment more amenable and there is far better accessibility to the major parks (Kinnoull Hill and the riverside ones) and the city centre.

Given the economic problems this faces it is important that it captures more business, and locating more new homes with good pedestrian, cycle, bus and taxi access to it would greatly help this to happen.

The rational approach would be to create a "development corridor" between Gannochy and Scone. There is already an excellent bus service on the road linking these. This would support the Government's and the Council's key aim of reducing car use and increasing travel by bus, cycle and on foot, and is the urban form now generally favoured in many countries. There is also plenty of land below the Kinnoull Forest Park which is largely unused and within easy reach of the city centre, "Rodney" and the fine riverside parks, which are now under-used.

It is stated in the document and Government advice that "green belts should have 'robust' boundaries such as natural features, railways or main roads. Yet in the East the proposed boundary does not meet this criterion but merely follows the edge of the present built-up land. The sensible and very "robust" boundary would be the lower edge of Kinnoull Forest Park, as it is open land below this is very attractive for housing and will be

under pressure for such. There is not good environmental reason for not allowing housing, Indeed the landscape would be greatly enhanced by such, in terms of aesthetics, and biodiversity, since there would be many more trees and gardens. As it is the Council has no powers to improve the lands which are in private ownership. In my opinion the large tracts of open land on the hillside are unsightly. As a rule of thumb even if trees cover only about 15% of an area it will appear from a distance to be a woodland.

The Council leader was reported as saying that a new secondary school would be needed. The plan does not even indicate where this would be. Given that a large number of secondary pupils live East of the Tay it would be sensible to have a new secondary there. There is a large tract of open land on the lower side of Muirhall Road above that owned by the NHS. A new road linking Scone Road at a point just beyond Gannochy and Muirhall Road would provide easy access from Scone and beyond. It could be extended to join the road below Corsie Hill. There is a footpath linking Gannochy and Muirhall Road.

Even without much new housing a new primary school is needed. The one on Dundee Road is already about 130 years old and has many problems, such as no parking for teachers and direct access to a busy main road. The land on Muirhall Road is well located to site a new primary school as it would be within safe walking distance of most homes in Gannochy and Kinnoull. There is enough land for a secondary and primary with plenty of space for games. There might be a "campus".

The new road suggested would provide sites for a local supermarket and shops and also a small office park. As it is there is very little employment on the East side of the Tay. Sale of sites for these uses could provide finance for the new road.

The construction of a new main road over the river to link the main road North of Scone with the by-pass is a very dubious idea. It would not stop most traffic coming through Bridgend since much of this originates in, or is destined for, Scone. Moreover many large vehicles are going to, or coming from, Dundee, the Carse, Fife, or Edinburgh and would not use the new road. Those doing so would save only a few minutes. Yet the cost, and environmental impact will be enormous. Even if the needed funds can be found there would surely be far better ways of using them eg. on building much more "affordable" housing.

There is inadequate explanation of how many proposals would be financed. Given that incomes will fall, as will funds for public services, this needs far more attention. It is said that the aim is to have enough land allocated for housing when the market returns to "normal". But, given the economic outlook there is no reason to assume this will happen. No longer can the market be left to provide the bulk of housing needs. Councils must do far more to facilitate and promote new building. Present levels are the lowest for decades. To do this land must be made available where developers are willing to build and people want to live. This was realised in the "Mian Issues Report". However, it seems not have been given adequate regard in the draft plan.

The rapidly "aging" of the population will pose huge problems for PKC. Yet again its implications seem not to be fully recognized in the plan. Contributing to the housing shortages is a lack of small homes within easy reach of facilities which suit elderly persons. This leads to under-occupation of homes suited to families but lived in by one or two people ("empty-nesters"). These are, reasonably, often reluctant to move to new areas, away from friends, local churches etc. By providing them with attractive alternatives locally they may be willing to move to places where they can easily access facilities on foot, bus or taxi and so give up car use. All are entitled to free bus passes and it should be made easier for them to use these.

The plan recognizes that varying housing densities (minimum and maximum) are appropriate and indicates ranges for such. However it does not explain just which category would apply where. It should surely do so. At least it could say which of the categories would apply to which kinds of locations. SPP 17 says that highest densities should apply to places where there is good pedestrian, cycle and/or bus access to places of work, education, shopping etc. These would be close to service centers, major bus routes etc. The Glasgow Plan already does this.

John Munro

68 Buccleuch Street

Glasgow G3 6PG



**Name:** Andrew Thompson

**Address and Postcode:**

Ellangowan,  
4 Polinard,  
Comrie  
PH6 2HJ

**Telephone no:** [REDACTED]

**Email address:** [REDACTED]

**Site Ref:** H58

**Chapter:** 8

**Paragraph no:** 8.7.2 & 8.7.4

**Would you like to see a change to the Plan? Please state this change.**

ROPOSED CHANGE TO PLAN

Inclusion of Site H58 Comrie within the proposed housing land allocation for the Landward area of Strathearn represents a major anomaly within the Draft plan, which is clearly at odds with the strategic policy set out in TAYplan. Furthermore, inclusion of this site results in a total housing land allocation for Strathearn of 440 units - representing a 66% OVER-ALLOCATION against the requirement for 265 units identified at para. 8.1.10.

Taking these two considerations together there can be no case for retaining site H58 within the Strathearn Area housing land allocation in the local plan. I submit that site H58 should be removed from the final plan presented to Ministers for approval. With paragraphs 8.7.2 and 8.7.4 amended accordingly.

Specific reasons justifying the case for this requested change are set out in detail below.

**Please include the reason for supporting the Plan/requesting a change.**

In relation to the over-arching TAYplan Spatial Strategy (Chapter 4) with which the Perth & Kinross Local Development Plan(LDP) is required to be consistent (ref. para. 1.1.4) we make the following observations:

- > Comrie is not identified as within one of the three tier hierarchy of settlements identified as the focus of most of the new development envisaged in the plan (para 4.2.1)
- > Below the tiered hierarchy the LDP seeks to allocate limited growth to those settlements with a range of facilities capable of serving local needs. The strategy also seeks to restrict growth within the smallest and least accessible communities. Addition of 30 low density (less than 10/ha) housing units on the 3.8ha Site H58 in Comrie is a

significant development in this context and is way beyond local need in the current economic climate. This provision is clearly at variance with the TAYplan Spatial Strategy. (para. 4.2.2)

> Para. 4.3.12 of the Spatial Strategy identifies prime quality agricultural land as an important national resource to be used sparingly and wisely. Site H58 Comrie is such land (under continuous arable cultivation, and offering great potential for improvement). Lying as it does in a sheltered position on the southern edge of the settlement this field could in the future be of great strategic importance to Comrie community as a potential contributor to local food security and diversity for a community relatively remote from conventional supply chains, and with the prospect of needing to adapt to climate change and to maintain its vitality and improve self-sufficiency in a post fossil-fuel economy. In this context change of use to housing (already demonstrated as surplus to projected requirements) of 3.8ha of potentially highly productive quality agricultural land situated right on the edge of the village can in our view not be regarded as either wise, or sparing use.

Policies within Chapter 3 of the draft LDP which further support the case made above for removal of site H58 are referenced as follows:

Policy RD1 Residential Areas (para. 3.5.5)

"....encouragement to proposals which fall into one or more of the following categories of development and which are compatible with the amenity and character of the area"

Proposal for 30 housing units on site H58 does not fall into any of the 5 categories listed (a)-(e), and is arguably not compatible with the amenity and character of the area. This is especially so in terms of the potential impact which access provisions and increased vehicle movements associated with a development of this scale would have on the residential environment and integrity of unadopted roads of Polinard and Cowden Road. The development of site H58 for housing would also have major implications for the continued defining character of the south end of the designated Dalginross Conservation Area, as improved vehicular access infrastructure, with adoption to council Highways Department standards would potentially compromise the integrity of "Top Square" and its approaches, which form the boundary and characteristic gateway to the Conservation Area.

Transport

(para.3.6.2)

"SPP identifies a need to shift to more sustainable modes of transport to help meet the Scottish Government's greenhouse gas emission targets. .... SPP comments that planning authorities should support development that reduces the need to travel and facilitates travel by walking, cycling and public transport and freight movement by rail and water."

Policy TA1B -Transport Standards (para. 3.6.5)



The proposed development of an additional 30 houses at site H58 on the extreme southern edge of Comrie village, which lies as it does towards the western margin of Perth & Kinross well away from main transport and retail infrastructure provisions and poorly served by public transport can not be justified in terms of compliance with Policy TA1B, which requires that new developments should be well served, and easily accessible to all modes of transport.

## The Natural Environment

(para.3.9.3)

"Government policy and legislation has established the foundation for environmental policies on matters as diverse as pollution and waste, planning and land use, wildlife and protected areas, and climate change. Everyone has a responsibility to manage these in a more integrated way ensuring stewardship of farmland, biodiversity and the scenic beauty of our landscapes."

A more integrated approach to management of Ecosystem Services in the context of Comrie's setting, and specifically in relation to site H58 should rule out the development of this site on grounds of ensuring stewardship of farmland, and potential flood risk exacerbation. (see also para. 3.9.8 and Policy NE4 Green Infrastructure, sub-para (c) & (f))

## Chapter 8: Strathearn Area Spatial Plan

### 8.7 Comrie & Cultybraggan

The case for inclusion of site H58 for housing as set out in this chapter of the draft LDP is weak and does not stand up to scrutiny when set against policy considerations identified above and projected housing land needs for the Strathearn Area detailed in the draft plan.

Strathearn Area Spatial Plan identifies additional housing land allocation required over the term of the LDP as 265 units (paras. 8.1.9 & 8.1.10)

Para. 8.1.13 states that:- "To provide choice one site is identified in Comrie, which currently has a limited supply." This statement is made without any further justification related either to the scale of the site referred to, which is clearly at odds with the TAYplan strategy for landward Strathearn, or in terms of demonstrating a particular need in Comrie for a development of this scale.

Para. 8.1.14 sets out a table showing housing land sites identified to "meet the TAYplan requirement"

However the cumulative total units on the 4 sites detailed (3 in Crieff and H58 Comrie) is 440 housing units.

This represents a +66% over-allocation against the identified need for 265 additional units as stated in para 8.1.10. Indeed the 3 sites identified in Crieff come to a total of 410 units representing a 55% over-provision against the identified need. So there can be no case for inclusion of an additional significant scale site in Comrie unless a clear local need is identified. No such case for this is made.

Para 8.7.2 identifies that Comrie... "is not identified for significant growth and the settlement boundary has been largely maintained, with a relatively modest site identified to the south of the village for housing."

This statement, under the heading Spatial Strategy Considerations appears to be a rather limp attempt to justify the inclusion of site H58 for housing, despite its significant scale (30 units) being at odds with TAYplan and clearly unjustified on this count, and also in the context of the already over-provision against identified need coming from the 3 Crieff sites, which are compatible with the TAYplan strategy which seeks to confine significant development to the major settlement hierarchy.

In the light of these figures and taking account of policy considerations identified above, together with the TAYplan strategy, with which the LDP is required to be consistent it is clear that the proposed allocation of site H58 in Comrie for housing development is unjustified and totally at odds with the main thrust of TAYplan and the founding principles of the LDP as stated earlier in the draft.

#### Conclusion

Site H58 Comrie should therefore be removed from the final Perth & Kinross Local Development Plan housing land allocation prior to submission to Scottish Government Ministers for approval.

Perth and Kinross Local Development Plan – Proposed Plan **Representation Form**

**Please read the notes below before completing this form. Completed forms should be returned to the Local Development Plans Team:** [DevelopmentPlan@pkc.gov.uk](mailto:DevelopmentPlan@pkc.gov.uk)

Please complete all 4 sections of the Plan, this will allow us to process your representation accurately and quickly. If you have comments on several documents or parts of the Plan please use separate forms for each.

The period of representation will end at **4pm on Tuesday 10<sup>th</sup> April 2012** and it is essential that you ensure that representations are with us by then.

Your representation will be considered as part of the Local Development Plan preparation process and will be processed by employees of Perth & Kinross Council's Environment Service. Representations and any information you provide (except signatures, email addresses and phone numbers) will be available for public inspection, published online and may be shared with other appropriate professionals and service providers. Under the terms of the Data Protection Act 1998 you are entitled to know what personal information Perth and Kinross Council holds about you, on payment of a fee of £10.

Once we have your representation(s) we will acknowledge them and inform you when the Proposed Plan has been submitted to Scottish Ministers for examination. Scottish Government guidance indicates that representations should be a maximum of 2000 words to provide the Examination Reporter with concise representations that can be resolved through written representations, hearings or a public inquiry as part of the examination process.

### 1. Contact details (only representations that include full contact details are valid)

Name	Mrs Lynda Gardiner
Address and Postcode	3 Knockard Avenue Pitlochry PH16 5JE
Telephone no.	[REDACTED]
Email address	[REDACTED]

Note: email is our preferred method for contacting you – if you do not wish to receive correspondence by email, please tick this box: ☐

### 2. Which document are you making a representation on?

Proposed Plan	<input checked="" type="checkbox"/>	SEA Environmental Report – Addendum 2	<input type="checkbox"/>
Supplementary Guidance	<input type="checkbox"/>	SEA ER Addendum 2 - Appendices	<input type="checkbox"/>

If making a representation on Supplementary Guidance, please state the name of the document:

### 3. Which part of the document are you making a representation on?

Policy ref.	<input type="text"/>	or			
Site ref.	<input type="text"/>	or			
Chapter	<input type="text"/>	Page no.	<input type="text" value="Various"/>	Paragraph no.	<input type="text"/>

Perth and Kinross Local Development Plan – Proposed Plan **Representation Form****4. What is your representation?**Are you supporting the Plan? ☐**Or**

Would you like to see a change to the Plan? Please state this change.

Yes I would like to see changes to the plan - please see below

Please include the reason for supporting the Plan/requesting a change.

Here are my concerns

Chapters 4 and 6

The large number of new houses proposed for Pitlochry on greenfield sites will impact unacceptably on its character and landscape. I also have concerns as to the likelihood of adequate infrastructure being put in place in Pitlochry to service all these additional houses and the people who will move into the area as a result of the developments. The primary school has problems accommodating local children just now let alone if there are more to accommodate.

Page 166 identifies a site adjacent to Robertson Crescent in Pitlochry for development for 90 houses. In my view, such intensive development of this site would reduce its important contribution to Pitlochry's landscape and character greatly and I therefore object to it. I would also be concerned about the adequacy of Robertson Crescent to cope safely with the extra traffic particularly in winter weather when, as the site is on a hill, problems will be exacerbated.

The Submit button will open an email addressed to the LDP team and attach this form, at this point you will have the opportunity to add text to the email and attach any supporting information.

[Save a copy](#)
[Print](#)
[Submit](#)

To submit your form you then have to send the email.

Perth and Kinross Local Development Plan – Proposed Plan **Representation Form**

**Please read the notes below before completing this form. Completed forms should be returned to the Local Development Plans Team:** [DevelopmentPlan@pkc.gov.uk](mailto:DevelopmentPlan@pkc.gov.uk)

Please complete all 4 sections of the Plan, this will allow us to process your representation accurately and quickly. If you have comments on several documents or parts of the Plan please use separate forms for each.

The period of representation will end at **4pm on Tuesday 10<sup>th</sup> April 2012** and it is essential that you ensure that representations are with us by then.

Your representation will be considered as part of the Local Development Plan preparation process and will be processed by employees of Perth & Kinross Council's Environment Service. Representations and any information you provide (except signatures, email addresses and phone numbers) will be available for public inspection, published online and may be shared with other appropriate professionals and service providers. Under the terms of the Data Protection Act 1998 you are entitled to know what personal information Perth and Kinross Council holds about you, on payment of a fee of £10.

Once we have your representation(s) we will acknowledge them and inform you when the Proposed Plan has been submitted to Scottish Ministers for examination. Scottish Government guidance indicates that representations should be a maximum of 2000 words to provide the Examination Reporter with concise representations that can be resolved through written representations, hearings or a public inquiry as part of the examination process.

### 1. Contact details (only representations that include full contact details are valid)

Name	Rebecca Linford & Alec Campbell
Address and Postcode	Gilboa, Milton of Collace, Burrelton, Blairgowrie, PH13 9PP
Telephone no.	[REDACTED]
Email address	[REDACTED]

Note: email is our preferred method for contacting you – if you do not wish to receive correspondence by email, please tick this box: ☐

### 2. Which document are you making a representation on?

Proposed Plan	<input checked="" type="checkbox"/>	SEA Environmental Report – Addendum 2	<input type="checkbox"/>
Supplementary Guidance	<input type="checkbox"/>	SEA ER Addendum 2 - Appendices	<input type="checkbox"/>

If making a representation on Supplementary Guidance, please state the name of the document:

### 3. Which part of the document are you making a representation on?

Policy ref.	<input type="text"/>	or
Site ref.	5.15 (Damside/Saucher)	or
Chapter	<input type="text"/>	Page no. <input type="text"/> Paragraph no. <input type="text"/>

Perth and Kinross Local Development Plan – Proposed Plan **Representation Form****4. What is your representation?**Are you supporting the Plan? ☐**Or**

Would you like to see a change to the Plan? Please state this change.

Curtailment of the extent of the proposed settlement boundary at both ends.

Please include the reason for supporting the Plan/requesting a change.

Please see separate attachment.

The Submit button will open an email addressed to the LDP team and attach this form, at this point you will have the opportunity to add text to the email and attach any supporting information.

To submit your form you then have to send the email.

**Save a copy****Print****Submit**

"Gilboa"  
Milton of Collace  
Burrelton  
Blairgowrie  
Perthshire  
PH13 9PP

3 April 2012

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

Dear Sirs,

Comments on Proposed Local Development Plan (Site: 5.15 Damside/Saucher)

We were shocked and concerned to see the proposed boundary for these areas has been drawn around both Saucher and the area you are referring to as "Damside". We feel there are no justifiable reasons for joining together two completely disparate and unconnected groups of houses and calling it infill residential development.

We would like to raise the following issues:

**1. Lack of a Relationship between "Damside" and Saucher**

The comments in the Proposed Plan refer to "opportunities for further infill residential development to create a more cohesive settlement". We have no association with Saucher and should not be referred to as one settlement. Saucher is in the PH2 postcode area, and is associated with Kinrossie; whereas we are in PH13 and associated with Burrelton. Much of the area you refer to as "Damside" was owned by Milton of Collace Farm and our address is Milton of Collace, Burrelton. The *2004 Draft Local Plan* correctly presented Saucher and "Damside" separately, and rounded off the housing at "Damside" in a sensitive and appropriate way.

**2. Existing Planning Permissions**

Planning permission has already been granted for 9 additional houses at "Damside" (see planning permissions 11/01543/IPL-11/01546/IPL and 12/00118/FLL, plus 09/01531/IPL). At present, there are 9 existing houses, and so the size of the housing group is already set to double. It is unreasonable to propose any further development or additions to the settlement boundary beyond the currently approved applications. Other areas with recent development have been dealt with much more fairly in the Proposed Plan. The notes for Kettins, for example, state "A few small developments have taken place within the village in recent years and no further allocation is proposed at this time to allow consolidation of these.". The doubling of "Damside" to 18 houses should be more than enough development for quite some time!

**3. Flooding – Area around Damside Farm**

The proposed infill argument hinges upon the availability of the field nearest to Saucher (around Damside Farm) for development. This is an area that was **not submitted** by local landowners for consideration in the Main Issues Report. Without the availability and desirability of developing this area it cannot be joined to Saucher and it negates the argument of infill. We cannot stress strongly enough that this field is unsuitable for buildings due to the high risk of flooding. It floods very readily - the water overflows the bank of the watercourse in the field opposite, crosses the road and enters the field, in addition to flooding the bank around the field from time to time. The way that

Damside Farm has been built on a high embankment should tell you everything you need to know! It is important this is retained as a flood plain to alleviate problems further downstream. The SEPA Flood Map clearly shows almost all of the field is at high risk (please refer to SEPA floodmap on page 5). Some photos of flooding, including the water crossing the road at Damside Farm, are included on page 6.

While we note the Council has said all planning applications will need flood assessments, if the Council persists in including this area in the Proposed Plan, we argue that a flood assessment should be carried out **before** its inclusion in the Plan to ascertain viability, as its exclusion means infill can never be completed. Any flood risk assessment undertaken should consider the watercourse on the other side of the road, not just the stretch around the field. It is our view that, even with mitigation, this area will never be suitable for housing due to the high flood risk.

#### **4. Flooding - Other Areas**

The bottom of the field around Mill Cottage also floods, and in 2004 much of the bottom of this field was under water. Again we would reiterate that it is important the watercourse is allowed to flood to reduce the probability of flooding elsewhere. The planning permission already granted under application reference 12/00118/FLL and the *2004 Draft Local Plan* provide a much more sensible settlement boundary for this area which largely avoids the higher risk flood areas.

Likewise, other areas included within the proposed settlement boundary are at risk of flooding, to varying degrees, and we question why the Council would encourage development along watercourses. Looking at the SEPA Flood Map attached, it seems obvious that developing along this watercourse is far from a sensible prospect!

#### **5. Area Behind Mill Cottage**

Including the area to the North/North East of Mill Cottage is an extension of the settlement boundary, as opposed to infill.

#### **6. Access Road Passes through Working Farm**

The minor road that will provide access to the proposed areas passes through Damside Farm (not steadings, as suggested in paragraph 5.15.1), which has farm buildings on both sides of the road, effectively meaning the road passes through the farms' "yard". There are a lot of farm machinery movements here at various times of the year, along with machinery storage, potato box storage etc. We question the suitability of building housing around a noisy farm and of additional traffic passing through this area. As indicated in the policy document *Housing in the Countryside*, "applications for dwellings on locations adjacent to a working farm will only be approved where the introduction of a dwelling will not compromise the continuation of legitimate agricultural and related activities or the amenity of residents". We would suggest that any applications for housing in the adjacent area would fail on this point, again bringing into question why the area has been designated as a site appropriate for infill.

#### **7. Housing Density**

*Policy RD1: Residential Areas* states that encouragement will be given to infill residential development should be of "a similar density to its environs". As stated earlier, the area you are referring to as "Damside" comprises 9 houses; Saucher numbers 12 houses. While no housing allocation has been indicated for this area in the Proposed Plan, the proposed settlement boundary could support a large number of houses, which certainly is not in keeping with the existing housing density of either area.

#### **8. Character & Environment**

*Policy RD1: Residential Areas* states that encouragement will be given to proposals which will "improve the character and environment of the area or village", and the proposed settlement boundary cannot be justified on this count either. Saucher has a long history and a distinct style, being set back from



the road and developed around a green; the area you refer to as “Damside” is a dispersed group of rural houses, and all of the residents wish for it to remain so. The unique character and identity of both areas should be protected and preserved.

#### **9. Road Traffic Safety & Core Path Network**

The roads in this area narrow, minor roads, with no pavements, and are unsuitable for additional traffic. Also, they are regularly used by horse riders and pedestrians as part of a circular route using sections of the core paths network (see *Draft Core Paths Plan: PKC Preferred Option*, Maps 40 and 44 – particularly BURR/180 of which the public road via Saucher is a common circuit).

#### **10. Infrastructure and Services**

There are no local services, basic utility services, and a lack of satisfactory public transport links.

#### **11. Right to Comment and to Residential Amenity**

We have not found any local people in favour of the *Proposed Local Plan* for Saucher/“Damside”. What we have found is that people are completely unaware of the *Proposed Local Plan*, let alone the proposals for these areas. On hearing about the proposals, every person we have spoken to is incredulous. While some have indicated they will provide feedback, others, despite their strength of feeling, feel unable to comment for a variety of reasons, including lack of access to the internet to view the plans, difficulty in writing or committing their thoughts to paper, and feeling unable to comment because they do not wish to upset landowners. We feel that the consultation process is not inclusive, and the Proposed Plan has not been communicated successfully.

**To conclude, we feel that the plans for these areas are fundamentally flawed. They are unfeasible, undesirable and spurious. Joining up these two distinct and unconnected areas should not be permitted. The 2004 Draft Local Plan viewed Saucher and “Damside” separately, and we cannot understand why this has changed in the intervening period, especially considering housing has not been built in those areas identified in the 2004 Plan.**

**We request the settlement boundary for “Damside” is significantly curtailed and is redrawn around the areas identified as part of the 2004 Draft Local Plan for “Damside”. This will more than double the number of houses in “Damside” and is enough development in this area for many years to come.**

Yours sincerely,

Ms Rebecca Linford  
Mr Alexander Campbell

**This representation was submitted with supporting documents, due to size these are unavailable on the website, but are available to view at Pullar House, 35 Kinnoull Street, Perth, PH1 5GD.**

Object- Site H27 Luncarty deler  
 Object- Greenside boundary south of Luncarty NES  
 Perth and Kinross Local Development Plan – Proposed Plan Representation Form  
 Support: Cross Tay link Road band of sea

Please read the notes below before completing this form. Completed forms should be returned to the Local Development Plans Team:

Please complete all 4 sections of the Plan, this will allow us to process your representation accurately and quickly. If you have comments on several documents or parts of the Plan please use separate forms for each.

The period of representation will end at 4pm on Tuesday 10<sup>th</sup> April 2012 and it is essential that you ensure that representations are with us by then.

Your representation will be considered as part of the Local Development Plan preparation process and will be processed by employees of Perth & Kinross Council's Environment Service. Representations and any information you provide (except signatures, email addresses and phone numbers) will be available for public inspection, published online and may be shared with other appropriate professionals and service providers. Under the terms of the Data Protection Act 1998 you are entitled to know what personal information Perth and Kinross Council holds about you, on payment of a fee of £10.

Once we have your representation(s) we will acknowledge them and inform you when the Proposed Plan has been submitted to Scottish Ministers for examination. Scottish Government guidance indicates that representations should be a maximum of 2000 words to provide the Examination Reporter with concise representations that can be resolved through written representations, hearings or a public inquiry as part of the examination process.

### 1. Contact details (only representations that include full contact details are valid)

Name

RACHEL BURNI

Address and Postcode

GLENBERVIE  
 REDBORTON  
 PH13EL

Telephone no.

Email address

Note: email is our preferred method for contacting you – if you do not wish to receive correspondence by email, please tick this box ☐

### 2. Which document are you making a representation on?

Proposed Plan



SEA Environmental Report – Addendum 2



Supplementary Guidance



SEA ER Addendum 2 - Appendices



If making a representation on Supplementary Guidance, please state the name of the document:

### 3. Which part of the document are you making a representation on?

Policy ref.

SEE ATTACHED DOCUMENT

or

Site ref.

or

Chapter

Page no

Paragraph no.

**Representation form continuation**

**Part 3.**

Proposed Green Belt Boundary and H27 Luncarty Housing Site pages 145 - 147

**Part 4.**

I Welcome support the new route C for the CTRL.

I do not support the land designation south of Luncarty for housing .

I do not support the absence of greenbelt south of Luncarty

**Reasons.**

The area of land south of Luncarty to Bertha Wood should be greenbelt and not housing/industrial land. This is a significant and detrimental change to the proposed greenbelt in the 2004 Draft Local Plan.

This is a constriction of the greenbelt size compared to the relative size of the belt around the rest of Perth.

It is an area of outstanding landscape value and should be retained as greenbelt to maintain the Perthshire country side beauty for both residents and visitors who enjoy walking cycling, fishing and other outdoor activities in this area.

It is prime agricultural farmland and should be retained as such.

The housing will devastate the beautiful walks down to the river from Luncarty and Redgorton.

The proposed housing will double the size of Luncarty village.

There is significant disapproval amongst other Perthshire village communities to increase the size of their villages eg Almondbank, Scone, Longforgan etc and there is desire to retain the size and identity of these village communities.

We choose to live in these areas because of the village size and the beautiful surrounding countryside. We wish the Luncarty village to retain its status and object strongly more housing and the erosion of the greenbelt.

Object- site H27 Luncarty delat  
 Object- Greenbelt boundary South of Luncarty  
 Perth and Kinross Local Development Plan - Proposed Plan Representation Form  
 Support Cross Tay Link Road bank of sea

Please read the notes below before completing this form. Completed forms should be returned to the Local Development Plans Team:

Please complete all 4 sections of the Plan, this will allow us to process your representation accurately and quickly. If you have comments on several documents or parts of the Plan please use separate forms for each.

The period of representation will end at 4pm on Tuesday 10<sup>th</sup> April 2012 and it is essential that you ensure that representations are with us by then.

Your representation will be considered as part of the Local Development Plan preparation process and will be processed by employees of Perth & Kinross Council's Environment Service. Representations and any information you provide (except signatures, email addresses and phone numbers) will be available for public inspection, published online and may be shared with other appropriate professionals and service providers. Under the terms of the Data Protection Act 1998 you are entitled to know what personal information Perth and Kinross Council holds about you, on payment of a fee of £10.

Once we have your representation(s) we will acknowledge them and inform you when the Proposed Plan has been submitted to Scottish Ministers for examination. Scottish Government guidance indicates that representations should be a maximum of 2000 words to provide the Examination Reporter with concise representations that can be resolved through written representations, hearings or a public inquiry as part of the examination process.

### 1. Contact details (only representations that include full contact details are valid)

Name **DAVID BURN**  
 Address and Postcode **GLENBERVIE  
 REDGORTON  
 PH13EL**  
 Telephone no. **[REDACTED]**  
 Email address **[REDACTED]**

Note: email is our preferred method for contacting you – if you do not wish to receive correspondence by email, please tick this box: ☐

### 2. Which document are you making a representation on?

Proposed Plan ☒ SEA Environmental Report – Addendum 2 ☐  
 Supplementary Guidance ☐ SEA ER Addendum 2 - Appendices ☐

If making a representation on Supplementary Guidance, please state the name of the document:

### 3. Which part of the document are you making a representation on?

Policy ref. **SEE ATTACHED DOCUMENT** or  
 Site ref.  or  
 Chapter  Page no.  Paragraph no.

**Representation form continuation****Part 3.**

Proposed Green Belt Boundary and H27 Luncarty Housing Site pages 145 - 147

**Part 4.**

I Welcome support the new route C for the CTRL.

I do not support the land designation south of Luncarty for housing

I do not support the absence of greenbelt south of Luncarty

**Reasons.**

The area of land south of Luncarty to Bertha Wood should be greenbelt and not housing/industrial land. This is a significant and detrimental change to the proposed greenbelt in the 2004 Draft Local Plan.

This is a constriction of the greenbelt size compared to the relative size of the belt around the rest of Perth.

It is an area of outstanding landscape value and should be retained as greenbelt to maintain the Perthshire country side beauty for both residents and visitors who enjoy walking cycling, fishing and other outdoor activities in this area.

It is prime agricultural farmland and should be retained as such.

The housing will devastate the beautiful walks down to the river from Luncarty and Redgorton.

The proposed housing will double the size of Luncarty village.

There is significant disapproval amongst other Perthshire village communities to increase the size of their villages eg Almondbank, Scone, Longforgan etc and there is desire to retain the size and identity of these village communities.

We choose to live in these areas because of the village size and the beautiful surrounding countryside. We wish the Luncarty village to retain its status and object strongly more housing and the erosion of the greenbelt



Object Site 427 Luncarty delete  
 Object Greenbelt boundary south of Luncarty  
**Perth and Kinross Local Development Plan – Proposed Plan Representation Form**  
 Support Cross Tug Lake Road band of search

Please read the notes below before completing this form. Completed forms should be returned to the Local Development Plans Team:

RECEIVED  
10 APR 2012

Please complete all 4 sections of the Plan, this will allow us to process your representation accurately and quickly. If you have comments on several documents or parts of the Plan please use separate forms for each.

The period of representation will end at **4pm on Tuesday 10<sup>th</sup> April 2012** and it is essential that you ensure that representations are with us by then.

Your representation will be considered as part of the Local Development Plan preparation process and will be processed by employees of Perth & Kinross Council's Environment Service. Representations and any information you provide (except signatures, email addresses and phone numbers) will be available for public inspection, published online and may be shared with other appropriate professionals and service providers. Under the terms of the Data Protection Act 1998 you are entitled to know what personal information Perth and Kinross Council holds about you, on payment of a fee of £10.

Once we have your representation(s) we will acknowledge them and inform you when the Proposed Plan has been submitted to Scottish Ministers for examination. Scottish Government guidance indicates that representations should be a maximum of 2000 words to provide the Examination Reporter with concise representations that can be resolved through written representations, hearings or a public inquiry as part of the examination process.

**1. Contact details** (only representations that include full contact details are valid)

Name	MANDY BURNS
Address and Postcode	GLENBERVIC REDCORTON PH13EL
Telephone no.	[REDACTED]
Email address	[REDACTED]

Note: email is our preferred method for contacting you – if you do not wish to receive correspondence by email, please tick this box ☐

**2. Which document are you making a representation on?**

Proposed Plan	<input checked="" type="checkbox"/>	SEA Environmental Report – Addendum 2	<input type="checkbox"/>
Supplementary Guidance	<input type="checkbox"/>	SEA ER Addendum 2 Appendices	<input type="checkbox"/>

If making a representation on Supplementary Guidance, please state the name of the document:

**3. Which part of the document are you making a representation on?**

Policy ref	SEE ATTACHED DOCUMENT			or	
Site ref				or	
Chapter		Page no.		Paragraph no.	

**Representation form continuation**

**Part 3.**

Proposed Green Belt Boundary and H27 Luncarty Housing Site pages 145 - 147

**Part 4.**

I Welcome support the new route C for the CTLR.

I do not support the land designation south of Luncarty for housing

I do not support the absence of greenbelt south of Luncarty

**Reasons.**

The area of land south of Luncarty to Bertha Wood should be greenbelt and not housing/industrial land. This is a significant and detrimental change to the proposed greenbelt in the 2004 Draft Local Plan.

This is a constriction of the greenbelt size compared to the relative size of the belt around the rest of Perth.

It is an area of outstanding landscape value and should be retained as greenbelt to maintain the Perthshire country side beauty for both residents and visitors who enjoy walking cycling, fishing and other outdoor activities in this area.

It is prime agricultural farmland and should be retained as such.

The housing will devastate the beautiful walks down to the river from Luncarty and Redgorton.

The proposed housing will double the size of Luncarty village.

There is significant disapproval amongst other Perthshire village communities to increase the size of their villages eg Almondbank, Scone, Longforgan etc and there is desire to retain the size and identity of these village communities.

We choose to live in these areas because of the village size and the beautiful surrounding countryside. We wish the Luncarty village to retain its status and object strongly more housing and the erosion of the greenbelt.

Object - Site H27 huncarly delete  
 Object - Green Belt boundary south of huncarly policy NES  
 Perth and Kinross Local Development Plan - Proposed Plan Representation Form  
 Support - Cross Tay link Ruband of seal

Please read the notes below before completing this form. Completed forms should be returned to the Local Development Plans Team:

Please complete all 4 sections of the Plan, this will allow us to process your representation accurately and quickly. If you have comments on several documents or parts of the Plan please use separate forms for each.

The period of representation will end at 4pm on Tuesday 10<sup>th</sup> April 2012 and it is essential that you ensure that representations are with us by then.

Your representation will be considered as part of the Local Development Plan preparation process and will be processed by employees of Perth & Kinross Council's Environment Service. Representations and any information you provide (except signatures, email addresses and phone numbers) will be available for public inspection published online and may be shared with other appropriate professionals and service providers. Under the terms of the Data Protection Act 1998 you are entitled to know what personal information Perth and Kinross Council holds about you, on payment of a fee of £10.

Once we have your representation(s) we will acknowledge them and inform you when the Proposed Plan has been submitted to Scottish Ministers for examination. Scottish Government guidance indicates that representations should be a maximum of 2000 words to provide the Examination Reporter with concise representations that can be resolved through written representations, hearings or a public inquiry as part of the examination process.

### 1. Contact details (only representations that include full contact details are valid)

Name	BRUCE BURNS
Address and Postcode	GLENBERNIE REDGORTON PH13EL
Telephone no.	[REDACTED]
Email address	[REDACTED]

Note: email is our preferred method for contacting you – if you do not wish to receive correspondence by email, please tick this box: ☐

### 2. Which document are you making a representation on?

Proposed Plan	<input checked="" type="checkbox"/>	SEA Environmental Report – Addendum 2	<input type="checkbox"/>
Supplementary Guidance	<input type="checkbox"/>	SEA ER Addendum 2 - Appendices	<input type="checkbox"/>

If making a representation on Supplementary Guidance, please state the name of the document:

### 3. Which part of the document are you making a representation on?

Policy ref.	SEE ATTACHED DOCUMENT			or	
Site ref.				or	
Chapter		Page no.		Paragraph no.	



Representation form continuation

**Part 3.**

Proposed Green Belt Boundary and H27 Luncarty Housing Site pages 145 - 147

**Part 4.**

I Welcome support the new route C for the CTRL.

I do not support the land designation south of Luncarty for housing .

I do not support the absence of greenbelt south of Luncarty

Reasons.

The area of land south of Luncarty to Bertha Wood should be greenbelt and not housing/industrial land. This is a significant and detrimental change to the proposed greenbelt in the 2004 Draft Local Plan.

- This is a constriction of the greenbelt size compared to the relative size of the belt around the rest of Perth.

It is an area of outstanding landscape value and should be retained as greenbelt to maintain the Perthshire country side beauty for both residents and visitors who enjoy walking cycling, fishing and other outdoor activities in this area.

It is prime agricultural farmland and should be retained as such.

The housing will devastate the beautiful walks down to the river from Luncarty and Redgorton.

The proposed housing will double the size of Luncarty village.

There is significant disapproval amongst other Perthshire village communities to increase the size of their villages eg Almondbank, Scone, Longforgan etc and there is desire to retain the size and identity of these village communities.

We choose to live in these areas because of the village size and the beautiful surrounding countryside. We wish the Luncarty village to retain its status and object strongly more housing and the erosion of the greenbelt.

---

**From:** John Champion [REDACTED]  
**Sent:** 10 April 2012 12:19  
**To:** TES Development Plan - Generic Email Account  
**Cc:** [REDACTED]  
**Subject:** Proposed Plan representation from Mr John Champion

**Follow Up Flag:** Follow up  
**Flag Status:** Green

**Attachments:** RepresentationForm.pdf; AVG Certification.txt



RepresentationForm.pdf (882 KB...  
AVG Certification.txt (156 B)

Thank you for submitting your form.  
Please save the mail attachment for your own records.

Additional Information -

MU7 -- A very large development by Crieff's standards. To date one of the town's most endearing features has been that no one area is so large that it totally dominates others. Added to this past development control has ensured that Crieff has a good mix of quality and styles in its housing stock. Care should be taken to ensure that the development is again of good quality, has a planned variety of styles and has clearly defined and suitably wide access roads to avoid visitors quickly becoming lost in a web of streets. Stipulating a minimum width of access roads would avoid them being reduced to one-way systems by parked cars that spill out from homes built without sufficient driveway space for modern families.

The Style of Crieff, the mound said to have been used by the Earls of Strathearn, to sentence wrong-doers is said to have been situated in this area. An opportunity exists to recreate the style as an attractive and unique feature for any new development and so provide further interest in Crieff's history and heritage.

Perth and Kinross Local Development Plan – Proposed Plan **Representation Form**

**Please read the notes below before completing this form. Completed forms should be returned to the Local Development Plans Team:** [DevelopmentPlan@pkc.gov.uk](mailto:DevelopmentPlan@pkc.gov.uk)

Please complete all 4 sections of the Plan, this will allow us to process your representation accurately and quickly. If you have comments on several documents or parts of the Plan please use separate forms for each.

The period of representation will end at **4pm on Tuesday 10<sup>th</sup> April 2012** and it is essential that you ensure that representations are with us by then.

Your representation will be considered as part of the Local Development Plan preparation process and will be processed by employees of Perth & Kinross Council's Environment Service. Representations and any information you provide (except signatures, email addresses and phone numbers) will be available for public inspection, published online and may be shared with other appropriate professionals and service providers. Under the terms of the Data Protection Act 1998 you are entitled to know what personal information Perth and Kinross Council holds about you, on payment of a fee of £10.

Once we have your representation(s) we will acknowledge them and inform you when the Proposed Plan has been submitted to Scottish Ministers for examination. Scottish Government guidance indicates that representations should be a maximum of 2000 words to provide the Examination Reporter with concise representations that can be resolved through written representations, hearings or a public inquiry as part of the examination process.

### 1. Contact details (only representations that include full contact details are valid)

Name	Mr John Champion
Address and Postcode	2 Inchbrakie Drive CRIEFF PH7 3SS
Telephone no.	[REDACTED]
Email address	[REDACTED]

Note: email is our preferred method for contacting you – if you do not wish to receive correspondence by email, please tick this box: ☐

### 2. Which document are you making a representation on?

Proposed Plan	<input checked="" type="checkbox"/>	SEA Environmental Report – Addendum 2	<input type="checkbox"/>
Supplementary Guidance	<input type="checkbox"/>	SEA ER Addendum 2 - Appendices	<input type="checkbox"/>

If making a representation on Supplementary Guidance, please state the name of the document:

### 3. Which part of the document are you making a representation on?

Policy ref.	Proposed Plan 2012 - Strathearn Area Spatial Strategy	or			
Site ref.	Crieff	or			
Chapter	8	Page no.	249-253	Paragraph no.	8.3.1 to 8.3.9

Perth and Kinross Local Development Plan – Proposed Plan **Representation Form****4. What is your representation?**Are you supporting the Plan? ☐**Or**

Would you like to see a change to the Plan? Please state this change.

1. Increase in housing and employment sites in Crieff should not take place without substantial improvements to the existing infrastructure
2. A higher emphasis on the re-development of brown field sites in the town centre
3. The recognition that the whole of Crieff needs a master plan - not just individual new developments
4. Investment in the High Street and King Street and surrounding commercial areas
5. The local authority is creating a second hub of business and activities in South Crieff. It needs to link the old town centre hub to the new one to create 'one centre' rather than competing 'islands' of activity.

Please include the reason for supporting the Plan/requesting a change.

E26, E27, H55, H57, MU7 and Op21 --

1. Further developments which add to the strain and dangers already imposed on the town by its inadequate roads and transport systems should not be permitted until congestion is alleviated, road safety improved, pollution reduced etc. These concerns apply with particular regard to Crieff's High Street, but are also evident in other parts of the town.

2. A relief road should be used to allow travellers not wanting to stop in the town to quickly and safely move by it. An opportunity exists to move traffic between the A85 near Gilmerton, along the unclassified road to Highlandman Loam straight down to the B8062. Traffic could then travel along the B road past the recycling centre on Broich Road and emerge at the junction with Burrell Street. Obviously the roads would need to be widened and straightened in places.

This improvement to the town's infrastructure would -

- greatly increase safety and enhance the experience of those who want to shop / visit the town centre
- improve journey times for traffic passing Crieff
- provide safer access to the proposed developments at H57, MU7, Op21 and E27.

3. The town's character should be protected. No new building should be allowed to be built above the height of the Strathearn Community Campus in Crieff.

E27 -- My understanding is that the buildings at this site are listed as Category B buildings by Historic Scotland. These buildings should be retained and either converted to dwellings or possibly used as offices. The site is adjacent to a proposed primary school, proposed supermarket and residential area. As such residential use of this site, incorporating the existing buildings is surely preferable.

H57 --

1. Residents parking ensures that Dolerie Terrace is already 'choked' with traffic at certain times of day. The road also acts as an alternate route to Perth and provides access to the many houses down its length and all of the estates on its north and south sides. A 'one-way system' is already operated, voluntarily, by necessity, amongst the majority of residents. Adding to the already high volume of traffic using this road by building additional houses adds to the existing dangers (children resident on Dolerie Terrace, queue jumping vehicles, excessive speed when negotiating parked vehicles etc).

2. The pavement ends on the road by the speed restriction signs. The road is well used with fast moving traffic and local residents taking exercise, dog walking etc. It seems inevitable a serious accident will occur at some point. A new development would need to provide a pavement for its residents; in turn this would benefit others in the area.

The Submit button will open an email addressed to the LDP team and attach this form, at this point you will have the opportunity to add text to the email and attach any supporting information.

**Save a copy****Print****Submit**

To submit your form you then have to send the email.

Perth and Kinross Local Development Plan – Proposed Plan **Representation Form**

**Please read the notes below before completing this form. Completed forms should be returned to the Local Development Plans Team:** [DevelopmentPlan@pkc.gov.uk](mailto:DevelopmentPlan@pkc.gov.uk)

Please complete all 4 sections of the Plan, this will allow us to process your representation accurately and quickly. If you have comments on several documents or parts of the Plan please use separate forms for each.

The period of representation will end at **4pm on Tuesday 10<sup>th</sup> April 2012** and it is essential that you ensure that representations are with us by then.

Your representation will be considered as part of the Local Development Plan preparation process and will be processed by employees of Perth & Kinross Council's Environment Service. Representations and any information you provide (except signatures, email addresses and phone numbers) will be available for public inspection, published online and may be shared with other appropriate professionals and service providers. Under the terms of the Data Protection Act 1998 you are entitled to know what personal information Perth and Kinross Council holds about you, on payment of a fee of £10.

Once we have your representation(s) we will acknowledge them and inform you when the Proposed Plan has been submitted to Scottish Ministers for examination. Scottish Government guidance indicates that representations should be a maximum of 2000 words to provide the Examination Reporter with concise representations that can be resolved through written representations, hearings or a public inquiry as part of the examination process.

### 1. Contact details (only representations that include full contact details are valid)

Name	Mark McKinney
Address and Postcode	14 Latch Burn Wynd Dunning PH2 0SP
Telephone no.	[REDACTED]
Email address	[REDACTED]

Note: email is our preferred method for contacting you – if you do not wish to receive correspondence by email, please tick this box: ☐

### 2. Which document are you making a representation on?

Proposed Plan	<input checked="" type="checkbox"/>	SEA Environmental Report – Addendum 2	<input type="checkbox"/>
Supplementary Guidance	<input type="checkbox"/>	SEA ER Addendum 2 - Appendices	<input type="checkbox"/>

If making a representation on Supplementary Guidance, please state the name of the document:

### 3. Which part of the document are you making a representation on?

Policy ref.	<input type="text"/>	or
Site ref.	Development Plan - Dunning	or
Chapter	5	Page no. <input type="text"/> Paragraph no. 16.2

Perth and Kinross Local Development Plan – Proposed Plan **Representation Form****4. What is your representation?**Are you supporting the Plan? ☐**Or**

Would you like to see a change to the Plan? Please state this change.

The removal of the proposal to use an agricultural field to the west of Dunning as a site for the expansion of the village (50 houses).

Please include the reason for supporting the Plan/requesting a change.

To place a development on the west side of the village will greatly increase the volume of traffic through the village (approximately an additional 75 cars) and will have a detrimental effect in terms of congestion, which can easily be avoided if a site or indeed sites are allocated on the east side or north side, where virtually all traffic will then be channelled away from the centre. Currently large numbers of lorries (Simon Howie deliveries to premises south of village and Simon Howie haulage) use the village as well as inhabitants and transient motorists, which already causes significant vehicle congestion. The difficulties HGVs have in accessing the Simon Howie premises regularly cause traffic jams, the one vehicle access only by St Serf's Church on the Perth Road and the single lane in front of Dunning Primary School compounds the traffic problem. A development on the east side can access Perth or Edinburgh without congesting the centre of the village, however travel to Auchterarder, Stirling or Glasgow will necessitate travel through the centre. A development or developments on the North side is the preferred option as an expansion of the village can take place with little or no impact on the road infrastructure and will cause minimal traffic congestion at peak and other times as all routes west and east can be accessed by easy access to the A9. There are numerous pieces of land north of the village which could be included in the expansion plan, however I would suggest developments of no more than 15 to 20 houses per site in order to maintain a balanced village expansion as a single site for 50 houses is not in keeping with the character of the village. However the fact remains why is this being proposed at all with the 800 houses being built in Auchterarder and the numerous unsold houses and building plots within the village, some of which have been on the market for a number of years?

There remains the problem of only 10 sewage points for Dunning, which will necessitate the construction of an additional sewage plant to cope with the higher volume of effluent generated by 50 new houses.

The impasse remains with a required expansion of Dunning Primary School to cope with higher number of school children as there is no available open land to replace that which will need to be built on.

The Submit button will open an email addressed to the LDP team and attach this form, at this point you will have the opportunity to add text to the email and attach any supporting information.

**Save a copy****Print****Submit**

To submit your form you then have to send the email.

Perth and Kinross Local Development Plan – Proposed Plan **Representation Form**

**Please read the notes below before completing this form. Completed forms should be returned to the Local Development Plans Team:** [DevelopmentPlan@pkc.gov.uk](mailto:DevelopmentPlan@pkc.gov.uk)

Please complete all 4 sections of the Plan, this will allow us to process your representation accurately and quickly. If you have comments on several documents or parts of the Plan please use separate forms for each.

The period of representation will end at **4pm on Tuesday 10<sup>th</sup> April 2012** and it is essential that you ensure that representations are with us by then.

Your representation will be considered as part of the Local Development Plan preparation process and will be processed by employees of Perth & Kinross Council's Environment Service. Representations and any information you provide (except signatures, email addresses and phone numbers) will be available for public inspection, published online and may be shared with other appropriate professionals and service providers. Under the terms of the Data Protection Act 1998 you are entitled to know what personal information Perth and Kinross Council holds about you, on payment of a fee of £10.

Once we have your representation(s) we will acknowledge them and inform you when the Proposed Plan has been submitted to Scottish Ministers for examination. Scottish Government guidance indicates that representations should be a maximum of 2000 words to provide the Examination Reporter with concise representations that can be resolved through written representations, hearings or a public inquiry as part of the examination process.

**1. Contact details** (only representations that include full contact details are valid)

Name	Dunalastair Estate
Address and Postcode	c/o Bidwells 5 Atholl Place Perth, PH1 5NE
Telephone no.	[REDACTED]
Email address	[REDACTED]

Note: email is our preferred method for contacting you – if you do not wish to receive correspondence by email, please tick this box: ☒

**2. Which document are you making a representation on?**

Proposed Plan	<input checked="" type="checkbox"/>	SEA Environmental Report – Addendum 2	<input type="checkbox"/>
Supplementary Guidance	<input type="checkbox"/>	SEA ER Addendum 2 - Appendices	<input type="checkbox"/>

If making a representation on Supplementary Guidance, please state the name of the document:

**3. Which part of the document are you making a representation on?**

Policy ref.	<input type="text"/>	or			
Site ref.	<input type="text"/>	or			
Chapter	<input type="text" value="6"/>	Page no.	<input type="text" value="188"/>	Paragraph no.	<input type="text" value="6.18"/>



Perth and Kinross Local Development Plan – Proposed Plan **Representation Form****4. What is your representation?**Are you supporting the Plan? ☐**Or**

Would you like to see a change to the Plan? Please state this change.

Kinloch Rannoch

1. Reduce area of H43

2. Expand settlement boundary of Kinloch Rannoch in the western part of the village, north of the river, in line with plan submitted with this response.

Please include the reason for supporting the Plan/requesting a change.

1. Reduce area of H43

(a) If this is to be an 'infill' site then its boundary should align with the existing settlement boundary (reducing site to just over half of its proposed area).

(b) Due to the fact that land develops slowly in this area, it would be sensible to have more than one allocation so that the housing requirements of the village are not relying on one landowner and one type of development to be forthcoming.

(c) There was significant local opposition to the allocation of H43 on publication of the Main Issues Report.

2. Expand settlement boundary of Kinloch Rannoch in the western part of the village, north of the river, in line with plan submitted with this response.

The principal reason given for selecting site H43 instead of allocating a site in the western part of Kinloch Rannoch, north of the river, was due to the apparent 1:200 year flood risk presented by the latter. However, the SEPA flood risk map does not take account of flood prevention measures. In this case, there is a dam directly south of the area proposed for settlement boundary expansion (refer to the plan submitted with this response). In the event of a severe flood, the dam would release water and the reservoir downstream of it would be allowed to flood because there are far fewer properties that would be affected.

In line with 1.(b) above, it would be sensible to have more than one allocation so that the housing requirements of the village are not relying on one landowner and one type of development to be forthcoming.

We propose that the plan is amended so that the settlement boundary is expanded to allow development in the western part of Kinloch Rannoch village, north of the river, because it would logically round off the settlement in that part of the village. This could be done subject to a detailed flood risk assessment.

Dunalastair Estate own the land in question and would be willing to commission such a flood risk assessment after discussion with the planning authority.

This representation was submitted with supporting documents, due to size these are unavailable on the website, but are available to view at Pullar House, 35 Kinnoull Street, Perth, PH1 5GD.

The Submit button will open an email addressed to the LDP team and attach this form, at this point you will have the opportunity to add text to the email and attach any supporting information.

To submit your form you then have to send the email.

Save a copy

Print

Submit



**RESPONSE by:**

**PITLOCHRY CIVIC TRUST**

( Scottish Charity No SC031071 )

**To proposed LOCAL DEVELOPMENT PLAN. Jan 2012.**

**OPEN SPACES. ( Green ) Map Page 167.**

**Map to include:**

**Primary school play area. ( 2 )**

**Delta Park. ( 1 )**

**The Cuilc. ( 4 )**

**INDUSTRIAL AREAS. ( Blue )**

**The area shown around the hospital, Ferry Road is too large and unrepresentative of the opportunities available( 6 ). More open space ( green ) should be shown( 5 ).**

**Bearing in mind the need to find more employment land in Highland Perthshire the Trust made the following suggestions in line with its positive responses to questions 10 (p46) and 14 (p48) of the Main Issues Report.**

*A business use for Auchnahyle steading should be found perhaps in the context of a mixed use development.*

*Secluded land at Auchnahyle might be identified as employment land, perhaps on a mixed use basis( houses with workshops etc).*

*( Commercial/ Industrial developments along the southern boundary of the site might be accessed by a short new road off the Atholl Palace drive ).*

**HOUSING.**

**Site H38, Middleton of Fonab.**

**This site is acceptable for housing development as indicated.**

**Cont'd**

2.

**Site H39. Robertson Crescent.**

**The depth of the Bio-Diversity site shown to the East requires to be increased to cover the recently felled woodland ( 3 ).**

**This site is acceptable for housing development. The proposed number, 90 is far too many. The Main Issues Report P102 stated 60 which should remain the maximum.**

**This is a very conspicuous site:**

*Seen from a distance as visitors approach Pitlochry from the south east, along the A9.*

*Close at hand to the west from West Moulin Road (A924 ).*

*At a range of distances from the north west, from the golf course and the Craigower walk.*

**Great care will have to be taken regarding house styles, heights of buildings and roof lines, especially of houses on the crest of the ridge. For instance, modest terraced housing might provide the density sought but NOT high density flatted dwellings.**

**Cont'd**

**3.**

**Additional Site. Auchnahyle. Tomcroy Terrace. ( 7 )**

**This site is shown as site B in the Main Issues report P102.**

**It is felt that this site should be included as it would enable the balancing figure of 30 houses to be easily made up. This is well within the figure of 50 in the Main Issues Report on P100.**

**The site is ideal as it is largely hidden from view.**

**There is also the possibility of allotments on this site, especially at the more visible north end, where the land may not be very suitable for building.**

**Please also see suggestions at *Industrial Areas* above.**

**The Trust has no objection to the Moulin boundary being moved as marked to include that land between Manse Road and the A924.**

**The Trust very strongly endorses the exclusion outwith the Settlement Boundary of all of the Main Issues Report site 694 ( land to the SW of Duff Avenue, Moulin ) not already developed.**

**Cont'd**

**ADDENDUM.**

**The attached map has been modified to show those proposals mentioned at the beginning of this response:**

**1. Delta Park.**

**2. Primary play area.**

**3. Bio-diversity area. ( Proposed to be larger than the “Indicative Landscaping” strip shown on P167).**

**4. The Cuile.**

**5 / 6 Bobbin Mill Wood / Hospital area.**

**7. Auchnahyle boundary as shown P102 Main Issues report.**

**C.G.Dilworth,  
Hon Treasurer,  
Pitlochry Civic Trust,  
20 Baledmund Road,  
Moulin,  
Pitlochry  
PH16 5EL.**

**April**

**9<sup>th</sup> 2012.**





28 Mill Gardens,  
Powmill,  
DOLLAR,  
FK14 7LQ

Planning Department  
Perth & Kinross Council  
PERTH

02 March, 2012

Dear Sir,

Ref. **Perth and Kinross Development Plans 2012. - POWMILL & RUMBLING BRIDGE**

I refer to a meeting, held in the Moubrey Hall, Powmill, on Tuesday 28 February, the paperwork for which was a typed copy of an invitation to Residents, from Councillor Michael Barnacle  
The available paperwork was dated February/March 2012 and regarding information from Councillor Barnacle and Bronwen Wheatley.

Unfortunately, and not for the first time, we had no notification to our address of the meeting. However, we were given a copy by a nearby friend in the Aldie Road. It may be the difficulty that we live at the furthest distant house from the main road on Mill Gardens. The 'post operatives' may be getting tired or run out of copies by the time he/she/they reach our address.

Clearly it is right and proper that all Perth & Kinross Councillors are influenced in their actions by the residents of their constituency. However, I must confess to being more than a little irritated by repeated reference to 'consultation with the Community **Strategy Group**' as a 'persuasive tool' for the unwary residents - as if the views of these tiny groups are significant in democracy. My understanding is that the 'Strategy Group' referred to by Councillor Barnacle is a composition of unelected, self interest groups featuring a few high profile, one or two very high profile individuals and apparently assuming the right to the 'clout' in the locality - despite their very small group size.

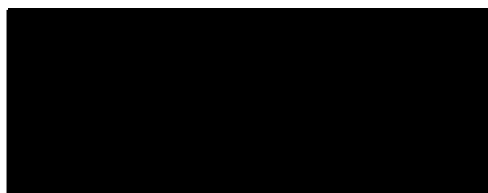
And now to the main point of my letter.

I am in no doubt that the Powmill community (and Rumbling Bridge) will benefit from a significant increase in population size, assisted by provision of housing development of high quality. Powmill would benefit from the boost provided by a range of sizes and styles of quality housing. I believe this to be entirely possible and I would urge you to grant consent for a major development and improvement of the village of Powmill.

Thomson Homes have clearly shown their ability to provide that necessary quality and commitment. The company have already invested in Powmill and I believe should be encouraged to invest even further in the major development of our village.

Although there may well be other areas of Kinross-shire suitable for minor development - and indeed there is currently one proposal that would, in my view, present a risk to public health, as a resident of Powmill I may not have the right to be quite so supportive or opposed to these developments in these other areas of our beautiful Kinross-shire.

**WE SUPPORT THE FULL DEVELOPMENT OF HOUSING IN POWMILL AS PROPOSED BY THOMSON HOMES.**



cc.

20 MAR 2012

4 JAMESFIELD  
SCOTLANDWELL  
KINROSS  
KY 13 9 NA.  
19-03-12.

PLANNING DEPT.  
PERTH & KINROSS COUNCIL  
DUNBAR HSE.  
36 KINNOCH ST.  
PERTH PH1 5GD.

YOUR REF. S13/2

Dear Sir,

With reference to the PERTH & KINROSS  
Council meeting on 13<sup>th</sup> March 2012.  
I object to the proposal to extend/  
increase the development of H54 plot  
eastwards.

My reasons are the same as  
my objections in my letter dated  
08-02-11

Yours sincerely



J. D. THOMAS

---

**From:** Susan Forde [REDACTED]  
**Sent:** 09 April 2012 18:30  
**To:** TES Development Plan - Generic Email Account  
**Subject:** Representations from Susan FG Forde

**Follow Up Flag:** Follow up  
**Flag Status:** Green

Response to Development Plan from Susan FG Forde: Causewayend, Main St; Scotlandwell; Kinross-shire; KY13 9JA

7.17.I Kilmagadwood should remain part of Scotlandwell as before, and not be a separate 'settlement'. Scotlandwell should include the Church, the Hall and access to the Community Woodland (Kilmagadwood) within the existing village settlement boundary.

7.17.4 I oppose H54 as a residential site as it would be detrimental to the character of Scotlandwell - a historic fermtoun with many features still preserved. Any new housing should be infill, or carefully positioned to enhance the village, and appropriate in design for a conservation area. (Recent developments on H17 have spoiled the south entrance to the village)

Scotlandwell requires proper foot/cycle/mobility access within the village; and connecting the Green and the Church and Hall. This latter would also link with the safer ways to Kinnesswood and onwards.  
Scotlandwell has no shop, no Post Office or van etc and people are obliged to travel by car far too much, including schoolchildren unable to walk or cycle the one mile to school.

Easter Balgedie: this should remain a settlement with its own boundary, as before.

Susan FG Forde

--

[REDACTED]



---

**From:** Diane Walker [REDACTED]  
**Sent:** 27 February 2012 21:45  
**To:** TES Development Plan - Generic Email Account  
**Subject:** Blairingone Reference E22  
**Follow Up Flag:** Follow up  
**Flag Status:** Green

My name is Diane Elizabeth Walker of Hunters Cottage Main Street Blairingone By Dollar FK14 7NU

Proposed Local Development Plan Blairingone E22 at Vicars Bridge Rd Blairingone  
Development of 0.5 hectares for general employment use

Currently grassland

I DO NOT WANT THIS LAND TO BE CHANGED TO GENERAL EMPLOYMENT USE  
I WANT THIS LAND TO REMAIN AS GRASSLAND  
OBJECT TO ITS CHANGE OF USE  
I DO NOT WANT ANY BUILDING ON THIS LAND AS IT WILL BE AN EYESORE TO THE  
VILLAGE AND MY KITCHEN WINDOW OVERLOOKS THIS.I DO NOT BELIEVE THIS  
CHANGE WOULD MEAN ANY EMPLOYMENT FOR VILLAGERS.I AM ALSO  
CONCERNED THAT IF THIS GOES AHEAD IT WOULD PROVIDE STORAGE FOR THE  
BIOMASS/WOOD CHIP FACILITY THAT THE VILLAGE IS OPPOSING AT LAMBHILL.  
I WANT THIS LAND TO STAY AS GRASSLAND  
Yours faithfully  
Diane Walker

Perth and Kinross Local Development Plan – Proposed Plan **Representation Form**

**Please read the notes below before completing this form. Completed forms should be returned to the Local Development Plans Team:** [DevelopmentPlan@pkc.gov.uk](mailto:DevelopmentPlan@pkc.gov.uk)

Please complete all 4 sections of the Plan, this will allow us to process your representation accurately and quickly. If you have comments on several documents or parts of the Plan please use separate forms for each.

The period of representation will end at **4pm on Tuesday 10<sup>th</sup> April 2012** and it is essential that you ensure that representations are with us by then.

Your representation will be considered as part of the Local Development Plan preparation process and will be processed by employees of Perth & Kinross Council's Environment Service. Representations and any information you provide (except signatures, email addresses and phone numbers) will be available for public inspection, published online and may be shared with other appropriate professionals and service providers. Under the terms of the Data Protection Act 1998 you are entitled to know what personal information Perth and Kinross Council holds about you, on payment of a fee of £10.

Once we have your representation(s) we will acknowledge them and inform you when the Proposed Plan has been submitted to Scottish Ministers for examination. Scottish Government guidance indicates that representations should be a maximum of 2000 words to provide the Examination Reporter with concise representations that can be resolved through written representations, hearings or a public inquiry as part of the examination process.

### 1. Contact details (only representations that include full contact details are valid)

Name	Andrew Finlayson as Chair of & on behalf of Comrie Community Council
Address and Postcode	Easter Tullybannocher, Comrie, Perthshire, PH6 2JY
Telephone no.	[REDACTED]
Email address	[REDACTED]

Note: email is our preferred method for contacting you – if you do not wish to receive correspondence by email, please tick this box: ☐

### 2. Which document are you making a representation on?

Proposed Plan	<input checked="" type="checkbox"/>	SEA Environmental Report – Addendum 2	<input type="checkbox"/>
Supplementary Guidance	<input type="checkbox"/>	SEA ER Addendum 2 - Appendices	<input type="checkbox"/>

If making a representation on Supplementary Guidance, please state the name of the document:

### 3. Which part of the document are you making a representation on?

Policy ref.	<input type="text" value="8.7"/>	or			
Site ref.	<input type="text" value="H58 Cowden Road"/>	or			
Chapter	<input type="text" value="8.7.3"/>	Page no.	<input type="text" value="260"/>	Paragraph no.	<input type="text"/>

Perth and Kinross Local Development Plan – Proposed Plan **Representation Form****4. What is your representation?**Are you supporting the Plan? ☐**Or**

Would you like to see a change to the Plan? Please state this change.

Site Specific Developer Requirements-

Given that the current principal access to the site is via the presently unadopted Cowden Road and that there may be seen to be potential to access the site via the presently adopted Langside Drive it is important that any moves to develop the site are clearly conditional on the developer's requirement to bring Cowden Road up to an adoptable standard and careful assessment is made of road safety matters relative to the complex junction with the main road.

Please include the reason for supporting the Plan/requesting a change.

Regardless of which access option the developers consider expedient to their plans it will inevitably be Cowden Road which takes the new traffic from the development.

The Submit button will open an email addressed to the LDP team and attach this form, at this point you will have the opportunity to add text to the email and attach any supporting information.

To submit your form you then have to send the email.

**Save a copy****Print****Submit**

Perth and Kinross Local Development Plan – Proposed Plan **Representation Form**

Please read the notes below before completing this form. Completed forms should be returned to the Local Development Plans Team: [DevelopmentPlan@pkc.gov.uk](mailto:DevelopmentPlan@pkc.gov.uk)

RECEIVED  
03 APR 2012

Please complete all 4 sections of the Plan, this will allow us to process your representation accurately and quickly. If you have comments on several documents or parts of the Plan please use separate forms for each.

The period of representation will end at **4pm on Tuesday 10<sup>th</sup> April 2012** and it is essential that you ensure that representations are with us by then.

Your representation will be considered as part of the Local Development Plan preparation process and will be processed by employees of Perth & Kinross Council's Environment Service. Representations and any information you provide (except signatures, email addresses and phone numbers) will be available for public inspection, published online and may be shared with other appropriate professionals and service providers. Under the terms of the Data Protection Act 1998 you are entitled to know what personal information Perth and Kinross Council holds about you, on payment of a fee of £10.

Once we have your representation(s) we will acknowledge them and inform you when the Proposed Plan has been submitted to Scottish Ministers for examination. Scottish Government guidance indicates that representations should be a maximum of 2000 words to provide the Examination Reporter with concise representations that can be resolved through written representations, hearings or a public inquiry as part of the examination process.

### 1. Contact details (only representations that include full contact details are valid)

Name	Douglas Nicholson
Address and Postcode	44 Inverleith Row Edinburgh EH3 5PY
Telephone no.	[REDACTED]
Email address	[REDACTED]

Note: email is our preferred method for contacting you – if you do not wish to receive correspondence by email, please tick this box: ☐

### 2. Which document are you making a representation on?

Proposed Plan	<input checked="" type="checkbox"/>	SEA Environmental Report – Addendum 2	<input type="checkbox"/>
Supplementary Guidance	<input type="checkbox"/>	SEA ER Addendum 2 - Appendices	<input type="checkbox"/>

If making a representation on Supplementary Guidance, please state the name of the document:

Proposed Plan

### 3. Which part of the document are you making a representation on?

Policy ref.	2.2.3	or			
Site ref.	Kirkmichael	or			
Chapter		Page no.	300	Paragraph no.	

Perth and Kinross Local Development Plan – Proposed Plan **Representation Form****4. What is your representation?**Are you supporting the Plan? ☐**Or**

Would you like to see a change to the Plan? Please state this change.

The village boundary should be amended to include the area shown on the enclosed plan to allow for development within the time scale to 2025 should it be required.

Please include the reason for supporting the Plan/requesting a change.

The land is within easy walking distance of the centre of the village and its many facilities such as Community run and prize winning shop, School, Hotel, bus service, Highland Games, Garage, Church and new village hall/community centre. The proposed site would concentrate development within or immediately adjacent to the existing village, is not on a busy road and would produce a more efficient settlement pattern which would enhance and reinforce a sense of place and community. The need for ribbon development or the development of large settlements outwith the boundary or within easy walking distance of centre would be avoided. The location continues the low key nature of the existing village which nestles within the topography of the land and allows organic growth without exceeding the capacity of the landscape in which it lies.

[Save a copy](#)[Print](#)[Submit](#)

## 9.13 Kirkmichael

### 9.13.1 Description

Kirkmichael is a small village of 210 inhabitants located on the A924 about 13 miles north-west of Blairgowrie and 12 miles east of Pitlochry. The village is situated in a valley on the River Ardlie and low lying areas close to the river are within the area of flood risk. It possesses a range of amenities and services.

### 9.13.2 Spatial Strategy Considerations

No new allocations are proposed, however there is scope within the settlement boundary for small scale infill development.

### 9.13.3 Infrastructure Considerations

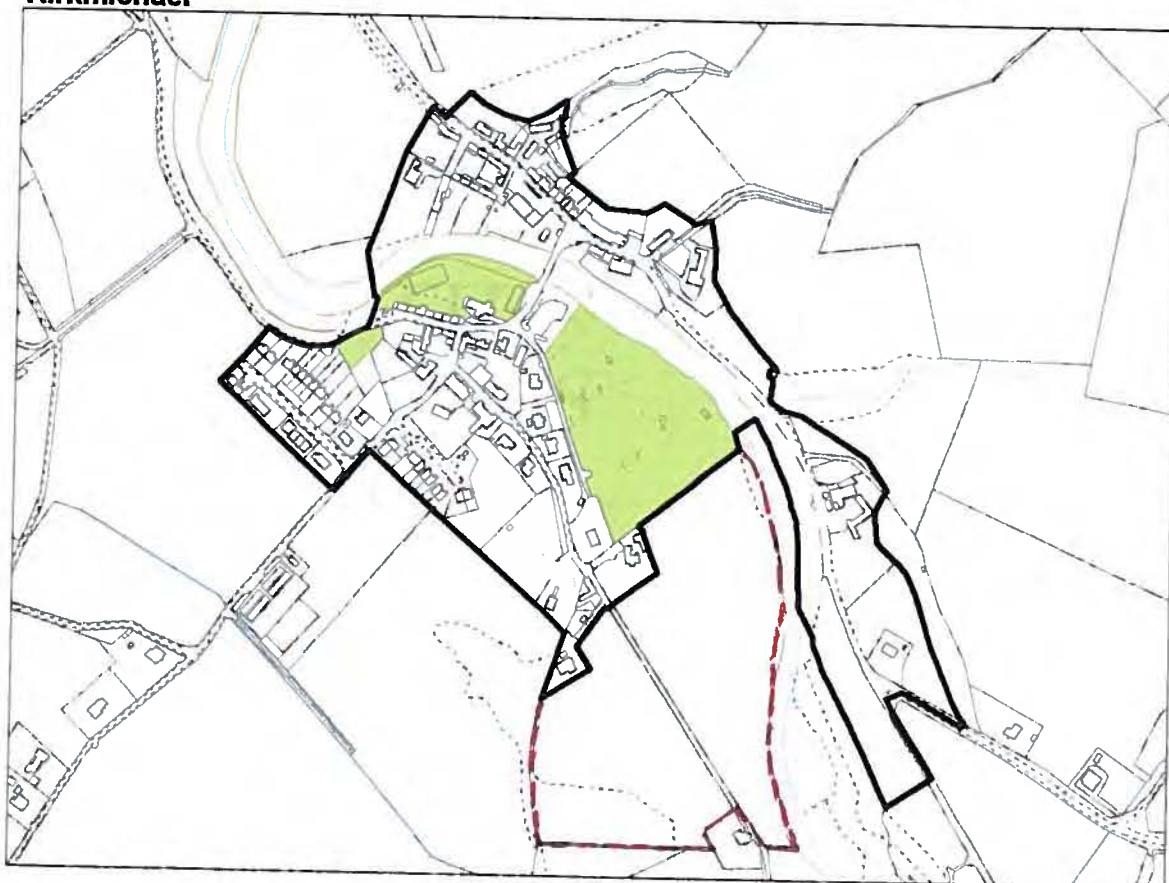
Drainage from all development should connect to Public Drainage System.

All development will be required to incorporate SUDS proposals and may require a Drainage Impact Assessment.

Any development of 5 or more houses will require to contribute towards affordable housing provision in accordance with the Council's Affordable Housing Policy.

All development will contribute towards the provision of on or off-site public space and play facilities where required, in line with Council guidance.

**Kirkmichael**



Reproduced by permission of Ordnance Survey on behalf of HMSO. © Crown copyright and database right (2011). All rights reserved. Ordnance Survey Licence number 100016971



Scale:  
1:6,000

