

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.

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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) DAVID C. WILSON

Address and  
Postcode

17 POLINARD COMRIE. (BY CRIEFF)  
PH 6 2HJ.

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



F58 POLINARD  
COMRIE

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.

or

Site ref.

or

Chapter

Page no.

Paragraph no.

## 4. What is your representation?

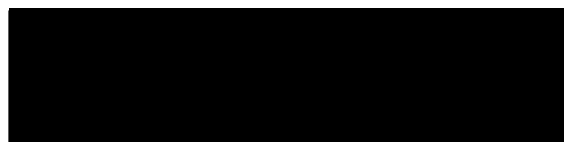
Are you supporting the Plan? ☐ NO

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. (AGAINST PLAN) ✓

I am against this proposed plan.  
 Courree is a conservation village and  
 the proposed field "F 58" has no access,  
 and lays on a river basin with  
 inadequate drainage. A river runs adjacent  
 to Cowden Road, and the area cannot  
 justify more housing.



DAVID WILSON

---

**From:** [REDACTED]  
**Sent:** 27 March 2012 09:25  
**To:** TES Development Plan - Generic Email Account  
**Subject:** Local Development Plan  
**Follow Up Flag:** Follow up  
**Flag Status:** Green

Dear Sir,

Development Plan Scheme - Stanley

I am commenting on the Development Plan Scheme behalf of the Stanley Development Trust.

The Trust requests that any planning gain sought from developers should be agreed up front before any proposed development be approved and that any gain would be directly allocated to the community.

As agreed at a public meeting in Stanley, held to discuss the Main Issues Report, the Stanley Development Trust is in a strong position to manage any such planning gain, having consulted locally to find out the needs and aspirations of the local community.

Kind Regards

Willie Waddell  
Secretary  
Stanley Development Trust

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

Name	Gordon Wood
Address and Postcode	12 Birch Avenue Blairgowrie PH10 6XE
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.	H64	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.

Site removed from plan

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

Size of Development :-

85 units in area is greater than the whole of golf course road residency - nearly 6 x larger than recent GS Brown development

This will harm the amenities of the neighbouring properties by virtue of its size and massing and does not respect or enhance the surrounding area

Type of Development:-

Appearance of development

Affordable housing is not compatible with the area

Adversely affects outlook of area

Loss of privacy to residents already in area

Loss of visual amenity

Infrastructure:-

Traffic generation as road system will be overburdened with circa 170 cars at the modern household count of 2 cars per household and plus the traffic the additional visiting population both industrial and private During construction the area would be adversely affected by additional volume of work vehicles and personnel. This would cause delays at access and safety would be affected as school in area Access by Hazlewood Road will have an unacceptable risk to safety to present householders in area exacerbated with additional volume of traffic

Access/egress from an already busy main road at the town limits which is an additional safety risk and vision will be impaired

Can the area sewage system support this volume of additional housing

Save a copy

Print

Submit

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**From:** Jan Carratt [REDACTED]  
**Sent:** 27 March 2012 21:01  
**To:** TES Development Plan - Generic Email Account  
**Subject:** Rep resentation  
**Follow Up Flag:** Follow up  
**Flag Status:** Green

Janet & Stephen Carratt.  
The Lee,  
West Huntingtower,  
Perth.

Re: H70

We would like to oppose the extent of this development upon what was previously designated a green belt area for the following reasons.

- 1) The impact on drainage of building 3000 houses. The A85 is already prone to flooding and the use of concrete in building foundations will increase the risk of flash flooding.
- 2) Apart from several fields adjacent to Noah's Ark, the remainder of the land is in full agricultural use. Were this all to be lost to housing this would be against the policy of food security for the United Kingdom.
- 3) The A 85 is already struggling to cope with the present flow of traffic and 3000+ cars would put severe pressure on both the A9 & A85.
- 4) Perth & Kinross would need to provide extra primary and secondary schools and fund the payment of extra teachers. Can they afford to do so?
- 5) The LDP states: ".....ensure inappropriate development does not compromise what makes Perth an attractive place to live, work & visit." A further Western Edge sprawl can only go against this intention.
- 6) Cleeve caravan park was sold to developers. Would the current caravan park at Noah's Ark be affected, bearing in mind the need for Perth to attract more tourists?
- 7) We would be most opposed to any development of housing on land bordering the Tibbermore Road as this road is unsuitable for any further increase in traffic and previous applications for planning permission have been rejected on the grounds that no further access on to this road should be granted. The field opposite Agricar and Kings, in particular, would be inappropriate for housing as both the aforementioned firms often have large and heavy vehicles accessing their premises. Furthermore, this field floods after heavy rainfall and the adjacent Tibbermore road always has a considerable amount of water lying after any rainfall.
- 8) Covering this whole area with housing would exacerbate the problem of Perth's One Air Quality Management Area.
- 9) The need to preserve West Huntingtower's rural setting and not allow it to become a part of a Perth conurbation.

We would also like to stress the need for a Master Plan to be submitted before any planning permission is granted for H70 and that local residents and the Community Council should be fully consulted.

Yours faithfully,  
Janet & Stephen Carratt

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

Name	David Gibson
Address and Postcode	4 Thompson Place Kinross KY13 8AD
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.	H46	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.

1. Road safety - Springfield Road.
2. Davis Park.
3. Core Path - Springfield Road to Gallowhill Road.
4. Traffic Short-cut.

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

I do not object in principle to the creation of new housing in zone H46, but would like assurances that any planned development will fully address the following issues.

1. The crossing by pedestrians of Springfield Road anywhere near the bend adjacent to Davis Park is a hazardous undertaking at present. It will become even more so with the increase in road traffic which will inevitably be generated.
2. If Davis Park is to be sacrificed, a similar facility of at least equal quality and accessibility should be created as close as possible to the present location.
3. The Core path which runs from Springfield Road to Gallowhill Road should not be jeopardised by any development and should remain open during any construction works. Furthermore, there is obvious potential for enhancement of the existing network by extending the route from Gallowhill Road to Auld Mart Wynd thereby improving links to the Loch Leven Heritage Trail. This is a tourist attraction which is growing steadily in importance.
4. The road layout within the new development should not be such that it would facilitate through traffic passing from Gallowhill Road to Springfield Road, tempting motorists with an obvious short-cut around the northwest perimeter of Kinross.

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

Name	Linda Gibson
Address and Postcode	4 Thompson Place Kinross KY13 8AD
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: ☐

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Site ref.	H46	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.

- a. Proposed access to site from A922 Springfield Road unsatisfactory
- b. Proposed secondary access to site from Gallowhill Road unsatisfactory
- c. Need for upgrading of M90

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

a. Road safety is my primary concern. The proposed access to the site is on a bend on what is a narrow, busy road with very poor sight lines. It is very difficult for pedestrians to cross this road at present and additional traffic will add to the problem. The access appears to cut into Davies Park which is well used by children from both side of Springfield Road. Again, this raises road safety concerns.

b. Gallowhill Road is a narrow, minor road with on-street parking at its junction with the B996/The Muirs. This junction is close to the main access to Loch Leven Campus and is very busy, particularly at school times. The road is unsuitable for additional traffic. There is also the added risk that the proposed housing estate will become a short-cut for traffic heading to Milnathort. Beyond the town boundary Gallowhill road has restricted width, with barely room for 2 vehicles to pass and yet the proposal would put more traffic on this road.

c. The M90 is substandard. There is no hardshoulder in the Kinross area. Has consideration been taken of the need to upgrade this stretch of motorway in the longer term? This would impact on the land available for housing.

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

Name	Linda Gibson
Address and Postcode	4 Thompson Place Kinross KY13 8AD
Telephone no.	[REDACTED]
Email address	[REDACTED]

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

Policy ref.	<input type="text"/>	or
Site ref.	H47 Lathro Park	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.

- a. Proposed access from Gallowhill Road
  - b. Integrate development into existing core path network

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

- a. Gallowhill Road is a narrow, minor road with on-street parking at its junction with the B996/The Muirs. This junction is close to the main access to Loch Leven Campus and is very busy, particularly at school times. The road is unsuitable for additional traffic. There is also the added risk that the proposed housing estate will become a short-cut for traffic heading to Milnathort. Beyond the town boundary Gallowhill road has restricted width, with barely room for 2 vehicles to pass and yet the proposal would put more traffic on this road.
  - b. There is an opportunity to link into existing Core Paths using the line of the old railway from Springfield Road to Gallowhill Road, all the way through to Auld Mart Road and eventually the Loch Leven Heritage Trail. No mention is made in this proposal to add core paths. This would be an opportunity lost.

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

Name	FIONA ERSKINE
Address and Postcode	16 TUMMEL PLACE KINROSS, SCOTLAND KY13 8YT
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?**

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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.	H46	or			
Chapter	7	Page no.	207	Paragraph no.	1

**4. What is your representation?**

Are you supporting the Plan? ☐ **No**

Or

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

YES. See the letter I have  
enclosed date 22/03/2012

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

Save a copy

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①

16 Tummel Place  
Kunross  
Scotland  
KY13 8YT

22/03/2012

Dear Sir/Madam,

I have been a resident for the past 15 years and I write to advise you that I object to the Proposed Plan H46.

I think that it's an absolute disgrace that this development would take away the Dawies Park to allow a road to be built off an already congested Springfield Road. This park is used by people of all ages and is a safe area for kids to play on long summer days and also for sledging on snowy days.

I am a mother of two boys now 15 and 18 and from my experience I can assure you that they have spent many happy days playing there, whether it be playing on the swings, ball games, racing on their bikes, or just generally chatting with their friends. Children need areas like this where they can feel safe, to help them to grow and to gain confidence to move onto the next stages in their lives.

Springfield Road is busy enough with



②

Gallowhill road is also a busy area if the developer was thinking to gain access to H46 from there as it is used by kids that go to the New High School on foot via Lamond Place. The pavements are narrow and would be dangerous.

Parents picking up their kids after High School are unable to get parked anywhere near the High School so tend to park in the Gallowhill Road area. I have done it myself on many occasions and have seen how busy it can be. Kids are also having to walk on the road at places as the pavement is not wide enough.

There is plenty of derelict sites within Kunross that could surely be used for housing.

- ① Old millbridge Surgery
- ② Old Library / Townhall
- ③ Mullers Bar
- ④ Community Buildings
- ⑤ Old High School
- ⑥ Old Lochleven Health Centre
- ⑦ Levenfields

Consider using H46 for Allotments or a Community Woodland, bringing wild-life into this area instead of extending



(3)

Create something that would bring the community together. People are crying out for Activities - Extend the Lochleven trail and make HHL into something that visitors too can enjoy

Mrs Jane Erskine

Enc-

Perth and Kinross Local Development Plan – Proposed Plan Representation Form **26 MAR 2012**

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

Name	J WRIGHT
Address and Postcode	SCHIEHALLION FEARNAN
Telephone no.	[REDACTED]
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?**

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

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

Policy ref.		or
Site ref.	H41 (Fearnan)	or
Chapter	6.13	Page no. 179 -180 Paragraph no.

#### 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.

Remove site H41 from the Plan and replace it with Tomdarroch, the site on Quarry Road used as an unofficial vehicle scrap yard, as the area zoned for housing development in Fearnan. Redraw the settlement boundary to exclude H41 and so retain the current shape of the village.

Change the designation of the Quarry from 'employment' to 'housing use' or 'agricultural use'.

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

(1) Replacement of Site H41 with Tomdarroch.

Site H41 is inappropriate as it would both use agricultural land and expand the village at its northern end, and could open the door to 'ribbon' development in adjacent fields towards Easter Auchtar.

The use of Tomdarroch as an unofficial vehicle scrap yard is unsightly, is not in keeping with the character of the village, and is a potential environmental hazard. Its use in this way has been a contentious issue for a considerable time, and it has been the subject of complaints and enforcement orders.

Replacing H41 with Tomdarroch would mean using 'brownfield' land instead of quality agricultural land in active use, and would minimise any adjustment to the village boundary, and eliminates creeping development.

It would allow for housing development at the same time as resolving local issues and concerns over the current use of Tomdarroch. It would meet the Council's requirements that future development should have minimal visual impact from the loch and that the rigg field pattern should be safeguarded in order to retain the character of Fearnan.

(2) Change the Designation of the Quarry

The designation of the Quarry site 'for employment use' in the Plan is a matter for concern, as it could result in noise and activities inappropriate to the peaceful nature of the village. The re-classification of the Quarry to housing, or agricultural use, eliminates these concerns.

The above proposals reflect the views of a meeting of members of the Fearnan Village Association.

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Dear FVA Member,

### **Perth & Kinross Council Local Development Plan**

There was a discussion on the Perth & Kinross Council's Development Plan, and its implications for Fearnan, at the recent Fearnan Village Association AGM.

The Plan designates a site on the northern boundary of the village (Site H41 on the enclosed map) for housing development. There was a strong feeling against this at the meeting. We have an opportunity to respond to the Council's proposal but need to offer an alternative, rather than simply say we don't like their suggestion. The view of the meeting was that if a site must be designated for development in Fearnan, then it would be preferable to designate the car scrap yard at Tomdarroch, as this would remove an eyesore and problem from the village.

There was also concern expressed over the designation of the old quarry as being 'for employment' as this could lead to noise and mess in the village, and the meeting expressed a preference for the quarry to be kept for agricultural or housing use.

It was agreed that as many people as possible would complete a response form expressing the preference of members and, to help with this, we have enclosed a blank copy of the form, along with a copy of the response that the Association will be submitting.

You need to complete Section 1 and Section 4. There are 2 parts to section 4, and you can either simply copy the FVA response, or put it into your own words.

**Remember that every adult can submit a separate response – if you submit one form from 2 people, it only counts once. Two forms from the household counts as 2 responses, even if they are identical.**

The Council must receive responses by **10<sup>th</sup> April 2012** and we have also provided a stamped addressed envelope for this purpose.

If you have any questions, please contact Neil [REDACTED]

Sue Gardener,  
FVA Chair

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

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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	Fearnan Village Association c/o Susan Gardner
Address and Postcode	Cala Sona, Fearnan, Perthshire, PH15 2PQ
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.	<input type="text"/>	or			
Site ref.	H41 (Fearnan)	or			
Chapter	6.13	Page no.	179 -180	Paragraph no.	<input type="text"/>

#### 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.

Remove site H41 from the Plan and replace it with Tomdarroch, the site on Quarry Road used as an unofficial vehicle scrap yard, as the area zoned for housing development in Fearnan. Redraw the settlement boundary to exclude H41 and so retain the current shape of the village.

Change the designation of the Quarry from 'employment' to 'housing use' or 'agricultural use'.

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

##### (1) Replacement of Site H41 with Tomdarroch.

Site H41 is inappropriate as it would both use agricultural land and expand the village at its northern end, and could open the door to 'ribbon' development in adjacent fields towards Easter Auchtar.

The use of Tomdarroch as an unofficial vehicle scrap yard is unsightly, is not in keeping with the character of the village, and is a potential environmental hazard. Its use in this way has been a contentious issue for a considerable time, and it has been the subject of complaints and enforcement orders.

Replacing H41 with Tomdarroch would mean using 'brownfield' land instead of quality agricultural land in active use, and would minimise any adjustment to the village boundary, and eliminates creeping development.

It would allow for housing development at the same time as resolving local issues and concerns over the current use of Tomdarroch. It would meet the Council's requirements that future development should have minimal visual impact from the loch and that the rigg field pattern should be safeguarded in order to retain the character of Fearnan.

##### (2) Change the Designation of the Quarry

The designation of the Quarry site 'for employment use' in the Plan is a matter for concern, as it could result in noise and activities inappropriate to the peaceful nature of the village. The re-classification of the Quarry to housing, or agricultural use, eliminates these concerns.

The above proposals reflect the views of a meeting of members of the Fearnan Village Association.

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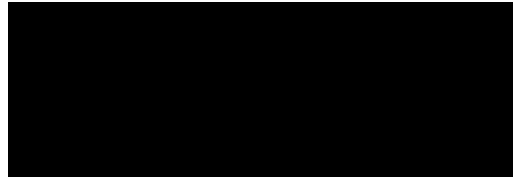
REC  
26 MAR 2012

S. Smart  
23 Manse Road  
Milnathort  
KY13 9YQ

With regards to proposed development of the Pitdownies Milnathort. This would be a big mistake the increase of traffic in one of the most congested parts of the town would cause problems.

With regards to flooding in the town this development will add to the problem. I have lived in Milnathort since 1927 we never had serious flooding until they developed the area behind Stewart & Smarts Garage in Stirling Road. It stands to reason any development in that area would cause greater problems. With regards to noise levels one of the planning officers stated at one of the meetings that the noise test just passed. I personally was in Manse Road when the meter reading was taken the gentleman doing the test set up the meter just inside the gate to the development area, nowhere near the main development, therefore that was not a true reading.

Perth & Kinross Council  
Town Planning  
Pullar House  
Perth.



11 THOMPSON PLACE

KINROSS

KY13 8AD

22 MAR 2012

MR DAVID LITTLE JOHN  
 PERTH AND KINROSS COUNCIL  
 THE ENVIRONMENT SERVICE  
 PLANNING & REGISTRATION

PULLAR HOUSE

35 KINNODDLE ST.

PERTH PH1 5AD

DATE 23 MAR 2012

ISSUED TO

EM

REPLY DATE

15/4/12

ENQUIRY / SERVICE REQUEST

DEAR SIR,

LOCAL DEVELOPMENT PLAN  
SITE KINROSS H 46.

I WRITE TO PROTEST TO  
 THE PROPOSED BUILDING OF 125  
 + HOUSES ON THE ABOVE SITE  
 IN KINROSS.

THE REASONS FOR MY OBJECTION  
 ARE LISTED BELOW:

- ① THIS LAND SHOULD BE A GREEN BELT AND LEFT AS SUCH
- ② TOO NEAR TO THE MOTORWAY
- ③ THE PROPOSED ACCESS TO THIS SITE VIA SPRINGFIELD ROAD



AND DAVIES PARK WOULD RESULT  
IN FIVE ROADS IN ONLY 80 YARDS  
AND COULD BE DANGEROUS TO  
MOTORISTS, PEDESTRIANS AND  
SCHOOL CHILDREN

(2) KINROSS FOR YEARS DID  
CAMPAIGN FOR A PLAY PARK  
AND NOW HAVE DAVIES PARK  
WHICH YOU PROPOSE TAKING  
AWAY.

(5) KINROSS IS A SMALL TOWN  
WITH VERY FEW AMENITIES  
AND ANOTHER TWO OR THREE  
HOUSES WE DO NOT NEED.

I TRUST YOU WILL CONSIDER  
THIS BEFORE A DECISION IS  
TAKEN.

Yours faithfully



**John Freeman R.I.B.A. R.I.A.S. M.R.T.P.I. Architect and Town Planner.**  
2 Donavoured, Connaught Terrace, Crieff, Perthshire  
Tel [REDACTED]

15<sup>th</sup> March 2012.

Your ref S 13/2

RECEIVED  
28 MAR 2012

**Proposed Local Development Plan**

**Objections to the Omission of part of H 17 currently included in the 2001 Strathearn Local Plan.**

I refer to your notification letter of the 26<sup>th</sup> January.

My clients, Oakbank(Crieff)Ltd, have been building houses at Horseshoe Drive, Bridle Way and Bramblefield for 10 years. So far they have completed 13. There are presently 2 under construction with detailed planning consent received for a third. They intend to build 2 further houses in Bramblefield and then extend Horseshoe Drive northwards and build up to 9 more houses on ground included as part of H 17 in the 2001 Strathearn Area Local Plan but strangely omitted in the Proposed Local Development Plan.

My clients would also ask that the Town Boundary at the north end of their site be moved back to the position shown on the 2001 Plan and the full extent of H 17 reinstated so that they can continue to develop their site.

Yours faithfully

[REDACTED]

John Freeman

Arkle  
3 Horseshoe Drive  
Crieff  
Perthshire PH7 4LT

RECEIVED

27 MAR 2012

26/03/2012

Mr David Littlejohn  
 Head of Service  
 Planning & Regeneration  
 Perth & Kinross Council  
 Pullar House  
 35 Kinnoull Street  
 Perth PH1 5GD

Dear Sir,

### **Local Development Plan H55**

I object strongly to the proposal to develop land at Laggan Road, Crieff for house building. As a local resident I have an interest in developments in this area of Crieff. The area around Crieff is renowned for its breathtaking beauty, and the proposed development would have a detrimental impact on Crieff's relationship with the surrounding landscape. Has a viable case been made for this development? Crieff is not a high employment area and the housing market in the town has been static for a considerable period of time.

The main strands of my objection are focused on safety and the impact of negative environmental changes on local tourism. For many years, Lady Mary's Walk has attracted tourists to Crieff from many areas of the UK and beyond. The recent upgrading of McCrosty Park has created another valuable attraction for tourists in the same area of Crieff, and the link between these two tourism hot spots is Laggan Road, the site of the proposed housing development.

My concerns about safety are motivated by the severe parking problems that have arisen in Laggan Road. The new McCrosty car park is inadequate when the weather is good, and overspill car parking takes place in Laggan Road. The entire length of this road can be full of parked cars at such times, thus converting it into a single track road. The introduction of construction traffic and the long-term increase in local traffic through Laggan Road could cause safety problems for children and disabled people.

My concerns relating to tourism derive from the negative impact created by the presence of construction traffic during the building period and from the effect of increased housing adjacent to the entrance to Lady Mary's Walk. I suspect that tourism would be severely damaged by the development, and I am saddened by the thought that this might diminish the attractiveness of our beautiful Strathearn town. Such a diminution would have awkward implications for the local council.

I ask the development control committee of Perth & Kinross Council to give serious consideration to the negative aspects of proposal H55.

Yours faithfully



Professor David Sloan, DSc, FRSE

Arkle  
3 Horseshoe Drive  
Crieff  
Perthshire PH7 4LT

25/03/2012

Mr David Littlejohn  
Head of Service  
Planning & Regeneration  
Perth & Kinross Council  
Pullar House  
35 Kinnoull Street  
Perth  
PH1 5GD

REC'D  
27 MAR 2012

### **Local Development Plan H55**

Dear Sir,

I strongly object to the proposed house building site in Laggan Road, Crieff (H55). This is an area of outstanding natural beauty, and any further development in the area would be a travesty.

Crieff is highly dependent on tourism and Lady Mary's Walk draws visitors from far and wide. Development here would severely affect tourism. On a practical note, I wish to highlight a few problems that might arise from the proposed development.

1. Construction traffic would reduce access to this beautiful walk.
2. For disabled people this is the **only** access route.
3. Since the upgrading of McCrosty Park, parking has become a huge issue. The regular overspill parking is in Laggan Road. The entire length of this road can be full of cars when the weather is good. Construction traffic would aggravate this situation.

I find it difficult to believe that P&K Council would sanction such a development application.

Yours faithfully



Margaret Sloan

Tel: 

Email: 

RECEIVED

26 MAR 2012

15 Highland Road  
Crieff  
Perthshire  
PH7 4LE  
20<sup>th</sup> March 2012

Planning and Regeneration Dept  
Perth and Kinross Council  
REF H55

Dear Sir

As a resident of Highland Road, I am concerned about the proposed housing development in Laggan Road.

Highland Road, together with Highland Crescent, Galloway Crescent and Angus Crescent can only exit via Laggan Road.

The existing Laggan Road leading to the proposed building site is a single track farm road, unsafe for access by large vehicles and much used by visitors and locals alike as they make their way to Lady Mary's Walk. This Walk is famed as a major Crieff tourist attraction (quite rightly so!) and is very well used by tourists, runners, walkers, cyclists and even horse-riders.

An additional 50 houses from the proposed development will mean extra traffic using the single track Turret Bridge and Lade Bridge through the MacRosty Park.

The new road layout at the junction of Milnab and Sauchie Roads is currently a hazard due to poor design.

Yours faithfully,



Malcolm D Hicks

RECEIVED  
26 MAR 2012

9 Highland Crescent,  
Crieff,  
PH 7 4LH.  
21st March 2012.

Dear Sirs,

**Proposed zoning of land at Laggan Road, Crieff for Housing**

As a resident of an estate where the only access to my house is via the road to be shared with the above proposed development I should like to object to the proposal to zone land at Laggan Road, Crieff for housing. I feel, that as Finance Director and Deputy Chief Executive of the Northern Ireland Housing Executive throughout the 1970's, when it was one of the largest comprehensive housing authorities in Europe, I am qualified to put forward my views.

How have you demonstrated the need for this development ? The housing market in Crieff is static. It is never very buoyant at the best of times but currently houses, including affordable homes, have been on the market for months and, in some cases, years.

Where are the prospective purchasers to come from? There is no major source of employment in the area. Retail and tourism is in decline with our High Street defaced by empty and crumbling hotels and shops.


My personal observation is that most of the incomers to Crieff in recent years are retirees- have you considered the possible effect that more elderly residents would have on social and health services? I understand that Crieff's current population structure is heavily weighted towards the elderly and, surely, as these fall out of the equation with time, there could be a need for fewer houses - not more!

I have already referred to the issue of access along Laggan Road. Since the very welcome upgrade of Macrosty Park the car park there has proved inadequate during school holidays and on summer weekends. The overspill relocates in Laggan Road, effectively turning it into single track with parking on corners and at junctions adding to a potentially dangerous situation. . The introduction of construction traffic and eventually more local traffic to this already quite narrow route could prove intolerable.

Lastly there is the environmental impact and the potential effect on tourism. Lady Mary's Walk is known throughout Scotland and beyond The further destruction of good farming land and the obstruction of panoramic views towards Loch Turret, at the very start of this popular attraction, must detract from one of Crieff's main tourist assets.

I ask you to consider seriously the downside of this development. It would appear that the only beneficiary would, yet again, be the landowner who, I see from his letter on your website, is pressing for a decision in his favour,

yours faithfully,



Gordon C Campbell

REC  
26 MAR 2012

1 Laggan Road,  
Crieff,  
Perthshire.  
PH7 4LQ

21 March 2012

Dear Sir,

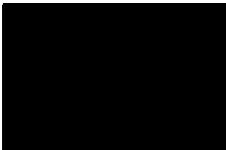
**PROPOSED ZONING FOR 50 HOUSES AT LAGGAN LANE, CRIEFF (H55)**

I am writing to express my concern regarding the proposal to erect some 50 houses on the proposed site known as H55.

My main concern is regarding the length of time it will take to build a housing scheme of this size and the amount of construction traffic that will travel along Laggan Road, which is the only access road to the proposed site and is totally unsuited for this type of heavy traffic over such a prolonged period of time. I am surprised that it is even being considered.

I understand the need for additional housing but feel that there must be a better, more accessible site in the region that can be developed.

Yours Sincerely,

A black rectangular box redacting the signature of SD Millar.

SD Millar

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RECEIVED  
27 MAR 2012

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

Name

KATHLEEN WILSON (MRS)

Address and Postcode

17, POLINARD COURT, PERTHSHIRE  
PH6 2HS

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

☒

F58

POLINARD COURT

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.

or

Site ref.

or

Chapter

Page no.

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.

Totally opposed to this Plan. V58.  
Reasons given below.

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

COUDEN ROAD, WHICH IS THE ACCESS ROUTE IS INADEQUATE FOR ALL BUT MINIMUM TRAFFIC. IT IS IN POOR CONDITION, AND IS FAR TOO NARROW TO ACCOMMODATE BUILDING TRAFFIC (LORRIES, DIGGERS ETC) AND ALSO THE TRAFFIC GENERATED BY 30 HOUSES. THE ROAD IS HARDLY WIDE ENOUGH TO ALLOW TWO CARS TO PASS WITHOUT ONE HAVING TO STOP OR DRIVE ONTO THE VERGE. DURING THE WINTER MONTHS IT IS IN FREEZING CONDITION. GIVEN THE TOTAL NUMBER OF HOUSES BEING CONSIDERED FOR THE WHOLE AREA, 30 HOUSES IN THIS SMALL FIELD SEEMS OUT OF ALL PROPORTION. THE FIELD IS liable TO FLOODING. THE SEWAGE SYSTEM MAY WELL BE INADEQUATE. THE PRIMARY SCHOOL NUMBERS ARE LIMITED. AT PRESENT TEACHER PUPIL RATIO IS GOOD, AND THE EXCELLENT STANDARD OF THE SCHOOL MUST BE MAINTAINED. COMRIE IS A "CONSERVATION VILLAGE" ATTRACTING VISITORS & TOURISTS WHO COME FOR IT'S PACE AND QUIET, IT'S FIELDS, OPEN SPACES AND COUNTRY VIEWS. SURELY THIS STATUS MUST BE MAINTAINED. COMRIE CANNOT BECOME A BANGING BURBURN TOWN. IT'S SPECIAL STATUS MUST BE PRESERVED FOR OBVIOUS REASONS, FOR FUTURE GENERATIONS. SURROUNDING COBBLERS WILL BE DEVALUED, AS THE PEEPERSHAW OBJECT, PRIVATE VIEWS WOULD ALL BE LOST. WHILE BUILDING WORK IS IN PROGRESS IT WILL BE DIFFICULT TO LIVE. I STRONGLY OPPOSE ANY BUILDING IN THIS FIELD.

Save a copy

Print

Submit

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

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

Name	Helen Powers
Address and Postcode	114 Argyll Road, Kinross, Ky13 8BL
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.	H46	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.

Refusal of access to new proposed site through Davis Park. Additionally objection to building of houses on proposed site

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

Loss of safe play area for local children - by building access road through the park area will deny local children the chance to play in a safe area and enjoy outside exercise. No other park area within easy walking distance.

Increase in traffic/ road safety - increase in traffic on Springfield and Gallowhill Road will be a danger to local children as these two roads are the main routes used by school pupils to walk to the both the primary and high schools.

Pressure on local services - more houses will be a strain on the Doctors' surgery which is already heavily used as well as dental services in Kinross

Schools - Primary school is already struggling with numbers of pupils. Classes at max numbers and classes are being taught in old portable rooms as no more room in the main school. Do not believe they could cope with more pupils.

No demand for housing - development next to park and ride still not fully sold. Excess of existing houses for sale in Kinross, many for more than 12 months. There is simply not the demand for this scale of development. Will likely be partially sold and then the rest will remain a building site.

Save a copy

Print

Submit

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**From:** philip maxwell [REDACTED]  
**Sent:** 28 March 2012 11:45  
**To:** TES Development Plan - Generic Email Account  
**Subject:** De velopment Plan MU5  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Sir/Ma'am,

#### WESTERN BLAIRGOWRIE DEVELOPMENT PLAN REF MU5

As the owner of 17 Dunkeld Road, Blairgowrie PH106RT I wish to make representation to the Council concerning the development plan ref MU5.

Dunkeld Road, Blairgowrie is an arterial route that already carries a considerable volume of traffic, including heavy vehicles, given the size of the road. By increasing the housing and or retail outlets that access this road I am concerned that there would be a negative impact (noise, pollution, traffic volume and traffic congestion) on those whose properties bound this road, in addition to those who use the road. I appreciate that this is a very early stage in the development plans however without any indication of transport network impact or changes to be made it is not possible to provide appropriate representation on this matter. Of particular interest to me would be the proposed access points for vehicles to the northern end of MU5.

The Northernmost area of the site at MU5 is visible on the approach into Blairgowrie on the Perth Road. As a hillside currently used for agriculture, any development of this part of the site will have a large visual impact on the area. I would like to express my concern that any such impact would have a detrimental effect on the visual appeal of Blairgowrie, which is currently an attractive rural town.

The Northernmost area of the site at MU5 is bounded by a Path which is simply named Galabank Path on the mapping supplied with the notification of proposed planning by Perth & Kinross Council. This makes no mention of the fact that this path is part of the Ardblair Trail. The Ardblair trail is an attractive and well used circular walk that is advertised in many tourist information locations. In addition the Ardblair Trail at MU5 links into the Cattaran Trail. Given the increasing importance of Tourism and the growing numbers of walkers attracted to the area to walk the Cataran Trail I believe Perth & Kinross Council would be better advised to make the most of this important path network. I notice in the site specific developer requirements for MU5 that there is mention of enhancement of biodiversity and community woodland or similar to be considered for the area north of the 90m contour line. Would the requirement for better diversity, community woodland and the potential benefits to tourism not be best served by developing the Ardblair Trail and its connection to the Cataran Trail, i.e. extending the proposal for community woodland above 90 m contour line to include the field bounded by the Ardblair Trail (Galabank Path).

As point of contention, the site specific developer requirements state an enhancement of biodiversity; how can a rural area being developed into a housing or industrial area be seen as an enhancement of biodiversity?

I respectfully request that these points be addressed and that I receive a reply.

Yours faithfully,

Philip Maxwell

29/03/2012

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

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

Name	Mr. Francis Haig Hamilton
Address and Postcode	"Millearne", 6 Cowden Road, Comrie, Crieff, Perthshire. PH6 2HH
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"/>

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Policy ref.	<input type="text"/>	or
Site ref.	Strathearn-Comrie and Cultybraggan H58	or
Chapter	<input type="text"/>	Page no. <input type="text"/> Paragraph no. <input type="text"/>

8-7-4

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.

Access to the Development must be clarified. Developer will almost certainly take access over Cowden Road.

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

I will only be prepared to support the plan if a condition of planning on the housing development is included that forces the developer to make up to an adoptable standard that portion of Cowden Road between the junction with the main road (Dalginross/South Crieff Road) and the access to the development and have this accepted onto the List of Highways maintained by the Council, and to improve the junction mentioned above to a more acceptable form to cope with the additional traffic.

The Contractor will almost certainly take access over this part of Cowden Road to construct the housing causing considerable damage to this road which is currently privately maintained.

Save a copy

Print

Submit

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

Name	Mr and Mrs Murray
Address and Postcode	13 Springfield Road, Kinross KY13 8BA
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:

na

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

Policy ref.		or			
Site ref.	H46	or			
Chapter	7	Page no.	207	Paragraph no.	1

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.

I would like the council to reject the plan to build houses on this site and road through the park.

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

Increased traffic in the area.  
Loss of playpark and woods, large open space playarea for free play rather than small purpose built playpark.  
Other places in Kinross for housing.

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



---

**From:** [REDACTED]  
**Sent:** 28 March 2012 23:16  
**To:** TES Development Plan - Generic Email Account  
**Subject:** ref H27 Luncarty South  
**Follow Up Flag:** Follow up  
**Flag Status:** Green

43 Hatton Road,  
Luncarty,  
Perth.  
PH1 3UZ.

Dear Ms Murray,

I wish to respond to the proposal for development at Luncarty South (ref H27). The area covered by this proposal in it's current use as agricultural land provides an opportunity to ground nesting birds for example skylarks (currently on the RSPB red list), I heard the first one of the year singing on the 21st February, a delightful sound!

I am really concerned that the development of this area will seriously jeopardize the future of skylarks, lapwings, curlews & other ground nesting species. I fear that our grandchildren will never know the real joys of the countryside with the few open spaces we have left & even less wildlife.

Yours faithfully  
Fergie Mitchell.

Oakfield Cottage  
Forgandenny  
Perth  
PH2 9ER  
[REDACTED]

29<sup>TH</sup> March 2012

Local Development Plan Team  
Planning and Regeneration Department  
Pullar House  
35 Kinnoull Street  
Perth  
PH1 5GD

Dear Sir

Ref: Proposed Local Development Plan at County Place, Forgandenny Site ref H22

I refer to the notice sent to me regarding the proposed local development plan for Forgandenny which includes the proposed site H22.

It is with disbelief that I read what the Council is proposing for such a development at Forgandenny and I am formally objecting to the proposed development in its entirety.

I will set out my objections below and detail the reasons behind them. In principle though it feels as if the Local Development Plan Team have not considered any of the PKC own guidelines, amended boundaries to suit and put down this proposal with no consideration to the visual impact on the village as you approach from the west along the B935. The tick box exercise has satisfied the numbers and will blot the countryside which the village so strongly wishes to avoid.

- This is a conservation village, one of 35 in Perth and Kinross.

*These are areas, judged to have special character by virtue of the distinctiveness and quality of the townscape, that are worth trying to protect....*

This opening line on the PKC web site gives the reader an indication of the importance of these conservation villages. The proposed site H22 adjoins the boundary of the Forgandenny conservation area of the village. It would be a blot of new buildings bolted on to the very site and character the Council is trying to protect. The proposed site is also directly opposite the Rossie Estate and house which is a listed building.

Ref: Proposed Local Development Plan at County Place Forgandenny Site ref H22.

- The proposed site H22 lies not only outside the existing village boundary but entirely on prime agricultural land. Such a high density site is totally out of keeping with the rural character of Forgandenny.

PKC are committed to conserving the very nature of the rural village. Allowing the proposed 30 units, an access road and a car park to serve the adjoining village hall on such a beautiful approach into the village of Forgandenny is completely out of character. PKC have a policy for not allowing fringe developments and green fill strips being sectioned off. This proposed development contradicts all that PKC holds dear in its policy of preserving the rural village setting.

An extract from PKC web site....

- *Some of the benefits of properly controlled development are:*
  - *Ensuring that new houses are connected to roads and sewers, and have shops and schools nearby*
  - *Keeping noisy or dirty industry away from residential areas*
  - *Ensuring that new buildings are well laid out and at home with their surroundings*
  - *Conserving nature, the countryside and good farmland*
  - *Ensuring that the road system can handle new developments*

Taking the 1<sup>st</sup> point the local services are already stretched. There is only one shop / Post Office. Forgandenny School is already very full and it would require children being bussed around the countryside further increasing the carbon footprint. There is no justification for that and again it feels as if that has not been taken into account.

The 3<sup>rd</sup> point is also out of step with the Council's proposal as the development is for 30 units. By comparison the 'Glennear Park' development, which is close by and is of similar size, has only 14 units. Again no consideration has been given to this impact and further consolidates the point that this has been a numbers exercise.

The 4<sup>th</sup> point is to do with nature and good farmland. This is 'good' farmland. In the past this site has been used in testing crops and is certainly not a brown fill site. Nature abounds and bats fly to and from Rossie Estate across the proposed site.

On the 5<sup>th</sup> point access to the B935 will be difficult. Line of sight to ensure safe exit on to the road is not good as the road has blind corners on the approaches to the village from the west. On the other side of the road there is already a junction formed where Station Road joins the B935 which is further obscured by the perimeter wall of Rossie House.

PKC have glossed over its own guidelines to allow this proposal to be put forward.

Ref: Proposed Local Development Plan at County Place Forgandenny Site ref H22.

- Flooding

In the proposed development plan there is an answer to this question as 'NO'.

This is totally wrong. Witnesses can testify to the proposed H22 site as a flood field . This at times can extend to a  $\frac{1}{4}$  -  $\frac{1}{3}$  of the proposed site. The run off from the field brings the B935 to a stop as the depth of water is greater than would allow cars to pass safely. The police and fire brigade have been called out to control traffic and pump water down Station Road. It is wrong of the Council to smudge over that by answering 'NO'.

PKC have a legal duty to control development so that land and buildings are used sensibly, in a way that is best for the whole community and the environment. The voice of objection to this particular proposed site is echoed by the village and the community. It would be detrimental and an eye sore bolted on to a conservation village whose character would be damaged by creating a New Build v Old Build element in a village divided by the B935.

There are a number of sites which were 1<sup>st</sup> included in the local development plan which would not have the eye jarring impact on a rural village. They would also better use village space and brown fill sites that would accommodate the number of units PKC have allocated.

- The field adjacent to Station Road although in the conservation area could be designed and integrated to bring the old and new together. It would also allow an area of parking for the Village Hall.
- The 'Quarry' site further down Station Road would make better use of a brown fill site which again would not take away from the look of the village on its approaches from either direction along the B935.

I have taken time to lay out not only my objections but to also detail the reasons behind them. I am looking to the Planning Dept to rethink the proposed location and to not blot the countryside with an add on development that will change the character of the village.

I hope you appreciate and will take on board the depth of feeling in the Forgandenny Community to preserve the rural look of the village and not bully through plans that suit the Council.

Yours faithfully

Philip Segaud

## 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.

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

Name ☒ MR. J S. HOGG MR. J. B. HOGG

Address and Postcode 61 SUTHERLAND DRIVE  
KINROSS KY13 8Y4

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.  or

Site ref. H46 or

Chapter 2 Page no. 207 Paragraph no. 1

## 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.

REFUSAL OF PLAN

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

CONGESTION IN STREETS NEARBY  
INCREASED TRAFFIC & POLLUTION  
DOUBT OF EXISTING HEALTH  
FACILITIES ABILITY TO COPE  
SAME FOR EDUCATIONAL FACILITIES

Save a copy

Print

Submit

Old Mill Cottage,  
West Cromwell Park,  
Almondbank,  
Perth PH1 3LW

26th March 2012

Your Ref. S13/2

Ms. Brenda Murray,  
Team Leader - Development Plans.  
Perth & Kinross Council,  
35 Kinnoul Street,  
Perth PH1 5GD

RECEIVED  
27 MAR 2012

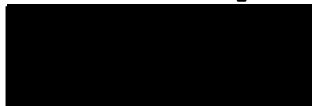
Dear Madam,

Proposed Local Development Plan.

I write to you regarding the above plan and in particular the site at West Cromwell Park.

1. The most important point I wish to make is the total unsuitability of the road to handle industrial traffic. Apart from the potholes and general state of repair the road is extremely dangerous in snow and ice. As an example, in the winter of 2011 we were unable to visit the village shop for well over a week.
2. Regarding the site in question there is no electrical or water supply for at least 200 yards.
- 3/ In my opinion as the site is used frequently by ramblers and walkers it is therefore a valuable community asset.

Yours faithfully,



J P Fullerton

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

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RECEIVED  
27 MAR 2012

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

Name	MRS FELICITY LEGGE
Address and Postcode	LITTLE KINNARD FORGANDENNY PERTHSHIRE PH29EX
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.	H22	or
Site ref.	H22 FORGANDENNY	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.

There should be no building allowed on a greenfield site. The boundaries of the village should not be changed to suit the Council.

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

National planning regulations about greenfield sites should not be ignored or changed just to suit the Council. It is scandalous how you propose to flout the Law to suit your purposes when much more legitimate planning applications in the area have been turned down. No wonder the Council is accused of inconsistency or even corruption. The access is dangerous and the road to and from the village is not designed for an increase in traffic. Forgan denmy does not have the infrastructure for more people, the school is full the bus service inadequate.

23.03.12

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(PROPOSED. LOCAL DEVELOPMENT)

Victoria Cotts  
 Tayview - Rd.  
 Luncarty  
 PH13HE  
 26/3/12

RECEIVED

28 MAR 2012

Dear Sirs

With regards to the proposed housing development at Luncarty (H27) to which I strongly object I have lived here 77 years and seen significant increase in the population, further increase would alter the character of our village.

The scenic open countryside and river to the south is an important setting of this village, ~~we~~ have some lovely walks. I for one won't be staying to live in the middle of a housing estate

yours faithfully



31 Rosamunde Pilcher Drive  
Longforgan  
Dundee  
DD2 5EF

Tel :-

RECEIVED 23<sup>rd</sup> March 2012

26 MAR 2012

Head of Service  
Planning and Regeneration  
Perth & Kinross Council  
Pullar House  
35 Kinoull Street  
Perth PH1 5GD

Dear Sir,

Proposal for development at South Longforgan sites H25 & H26  
(08/01890/IPM & 08/01889/IPM)

With reference to the above, my wife and I wish to object in the strongest terms to the proposed developments.

As you will know Longforgan is a very old village that was originally built to support the then local farming communities, its roads were constructed mainly for horses, horse drawn vehicles and pedestrian traffic.

It has one small General Store which has nowhere to expand, a Church, Police Station and a "Coaching Inn". There are no Medical or Dental facilities and the Post Office closed some years ago. The local Primary school is at bursting point and the Teachers have to park their cars in the street thus adding to the general congestion.

The narrow Main Street and proximity of the houses to the road can barely support the current level of traffic safely. The on-street parking by the residents of Main Street reduces the width considerably. The streets are not wide enough to enable large vehicles (i.e. Buses, Lorries and Agricultural vehicles to and from nearby farms, notwithstanding any Emergency vehicles requiring immediate/urgent access through the village) to pass each other easily.

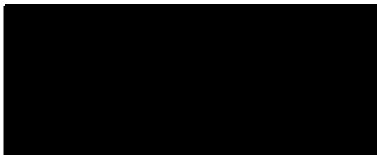
Traffic from the proposed new developments would have to travel along Rosamunde Pilcher Drive, North on Station Road and West along Main Street past the Inn, School and Shop, and through the congested village to access the A90 to Perth or Dundee.

The junction of Main street and Station Road, which would carry ALL the traffic resulting from the proposed development, is almost a blind junction and the likelihood of accidents is very high. Any increase in traffic volume could make this junction the most dangerous in the village. Furthermore Station Road has a very narrow stretch of about one hundred yards leading down from Main Street junction and again narrows to approximately one car width immediately south of the turn into Rosamunde Pilcher Drive.

Rosamunde Pilcher Drive itself is barely wide enough to support the current level of traffic and with the number of young children living on the Estate any increase in traffic levels through the estate would be totally unacceptable.

We request that Perth & Kinross Council reject the above Proposal for housing development in Longforgan.

Yours faithfully,

A large black rectangular box redacting the signature of Anne & Iain Day.

Anne & Iain Day

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

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

Name	Pauline Smith
Address and Postcode	65 Argyll Road Kinross Y138BL
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:

N/A

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

Policy ref.	N/A	or			
Site ref.	H46	or			
Chapter	7	Page no.	207	Paragraph no.	1

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.

I would like to see a change to the plan that does not include an access road through the current Davis Park area.

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

This is a highly used multi functioning play park that is suitable for all ages. There are no other parks in Kinross that have equipment that is suitable for young toddlers. This is a large area that can be used for football and basketball as well as having play equipment for older children. The play play park is used by all ages and the wildlife surrounding the park makes it a valuable learning experience for children. If a road is created through the park and the park relocated I believe that the access road will be used as a main route for cars from Milnathort, Lathro, Gallowhill and Wimpy areas as a quicker and more direct route to local Sainsburys and the M90. This would make for heavy traffic close to the adjacent nature walkway and make the area unsafe for children and dogs.

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)

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

Name	Neil Martin
Address and Postcode	martin town planning ltd on behalf of Force 9 Energy East End Park, Halbeath Road, Dunferline, KY12 7RB
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.	Policy ER1	or			
Site ref.		or			
Chapter		Page no.		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.

Criteria (b) of Policy ER1A should be deleted.

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

See attached Statement setting out in detail the basis for the above representations

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





**REPRESENTATION ON THE PROPOSED  
PERTH & KINROSS LOCAL DEVELOPMENT PLAN**

**29 MARCH 2012**

**martin town planning ltd.**

## CONTENTS

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### Appendices:

Appendix 1: PKC LDP Representation Form

Status	FINAL
Project Reference	2012 – 0209
Date of Issue:	29 March 2012

## 1. Introduction

- 1.1 This Representation has been made on behalf of Force 9 Energy in respect of the emerging development plan policy relevant to onshore wind farm proposals.
- 1.2 Force 9 Energy is a small UK based wind farm Development Company. Formed in 2002, the company is passionate about the need to utilise the natural environment and onshore wind capacity to deliver the country's energy needs from renewable resources.
- 1.3 Force 9 Energy is currently developing seven wind farm projects throughout the UK and has completed development of two other projects which are now operational (Markhill in Dumfries and Galloway and Alltwalis in South Wales).
- 1.4 Of the seven projects in development, two have been consented for construction which is expected to be complete in 2013. A pipeline of other projects is at pre-development stage including the Company's Mull Hill project which is the subject of a live Planning Application before Perth & Kinross Council (reference 11/02151/FLM).
- 1.5 All of Force 9's development sites are carefully selected after a lengthy process which takes into consideration issues such as landscape sensitivities as well as planning, environmental and technical criteria, and the company ensures that active and meaningful consultation takes place with the community on each development.
- 1.6 Having reviewed the proposed Local Development Plan (LDP) it is our view that proposed Policy ER1 (Renewable and Low Carbon Energy Generation) and Policy ER6 (Managing Future Landscape Change to Conserve and Enhance the Diversity and Quality of the Area's Landscapes) would benefit from revision in light of current National Planning Policy.
- 1.7 Specific areas of concern with regard to Policy ER1A (New Proposals) are with the following criteria:

*(b) The contribution of the proposed development towards meeting carbon reduction targets.*

*(g) Any positive or negative effects they may have on the local or Perth & Kinross economy either individually or cumulatively.*

- 1.8 In addition, there is concern over the way the Policy is couched in terms of community led schemes, specifically the phrasing of the last element of ER1A:

*Proposals for the development of renewable or low carbon sources of energy by a community may be supported where the development does not meet all of the above requirements, provided it has been demonstrated that there will not be significant environmental effects and the only community significantly affected by the proposal is the community proposing and developing it.*

- 1.9 With regard to Policy ER6, the introductory paragraph is of specific concern in terms of the very high Policy test that this establishes through the phrasing:

*Development and land use change should be compatible with the distinctive characteristics and features of Perth & Kinross's landscapes. Accordingly, development proposals will be required to conserve and enhance the landscape qualities of Perth and Kinross.*

- 1.10 Specifically, whilst perhaps a laudable aspiration, the concern raised here is that in effect no development proposal within the rural parts of Perthshire could meet this Policy test.

- 1.11 These issues are addressed in turn within the following sections.

## 2. Representation 1: Policy ER1A - Carbon Reduction Targets

- 2.1 Criteria (b) of Policy ER1A Renewable and Low Carbon Energy Generation (New Proposals) indicates that proposals will be reviewed in the context of:

*The contribution of the proposed development towards meeting carbon reduction targets.*

- 2.2 At present, National energy policy is focussed on significantly increasing the contribution of renewable energy generation capacity to meet the country's energy needs. The Scottish Government's Policy on energy generation is that this should be largely de-carbonised by 2030. In terms of the contribution of renewable energy generation, the target is that at least 100% of gross electricity consumption will be met through such sources by 2020.
- 2.3 The 2020 target equates to between 14GWe and 16GWe of installed capacity (reference: Scottish Government's Route-map for Renewable Energy in Scotland 2011). At 2011, there was around 4.2GWe of installed capacity derived from renewable generation systems with a further 3.3GWe either under construction or consented. Whilst there is a large volume of possible capacity in planning or scoping stages, all projections currently point towards a shortfall in meeting the installed capacity target at 2020.
- 2.4 However, even if the 2020 target is met, Scotland has a unique position of having a significant generation potential and the opportunities will arise through the next decade to increase the levels of electricity exported to England and Ireland. Scottish Planning Policy (SPP) makes a very specific comment in this regard in reference to the previous "50%" target at paragraph 182: *These targets are not a cap.*
- 2.5 The baseline for SPP is to support all and any appropriate renewable energy proposals and this states at paragraph 184 that planning authorities are tasked with: *ensuring that an area's renewable energy potential is realised and optimised.*
- 2.6 It is fully accepted that SPP presents caveated support and similarly any development plan policy framework should then be supportive of all and any opportunities but suitably caveated to ensure that full regard is had of all potential impacts on the natural and cultural heritage as well as all

relevant socio- economic factors. On this, the key phrases to draw from SPP are for such opportunities to then be *realised* and *optimised*.

- 2.7 At no point does SPP ask for proposals to assess the contribution they may make to meeting national (or local) energy targets. This is presumably on the basis that all proposals, if suitable in other regards, will make a valuable contribution to meeting those targets; particularly so in the context of a predicted shortfall in installed capacity by 2020.
- 2.8 In many decisions issued by the DPEA in respect of renewable energy developments, is included a conclusion along the lines of the proposal *will increase the amount of energy generated by renewable sources and so is supported by the general encouragement that the Scottish Government gives to renewable energy projects in pursuit of its climate change targets* (paragraph 42 P-PPA-170-2024).
- 2.9 Such a view is also expressed in the context of negative decisions issued by the DPEA or its predecessor. For example, within the Reporter's finding of fact for Abercairney (IEC-3-110), they effectively dismissed the view that any relatively small contribution to meeting renewable energy needs is largely irrelevant. At paragraph 14.75, the Reporter stated:

*The argument that a contribution would only be small, if consistently applied, has the potential to significantly weaken UK Government and Scottish Minister's support for reducing reliance on fossil fuels.*
- 2.10 The Reporter then concluded that the relatively small contribution that the Abercairney proposals could have made would have been sufficient to at least overcome *immediate impacts on the landscape resource*.
- 2.11 Ultimately, wind farms can only be constructed where there is a suitable wind resource and thereafter, where any resulting impacts have been assessed as being negligible, possible of being mitigated or are otherwise acceptable. How much the proposals contribute to meeting carbon reduction targets, whilst perhaps of some academic interest, is then largely irrelevant in the consideration and determination of planning applications.
- 2.12 On the basis of the above, we would request that criteria (b) is deleted from LDP Policy ER1A.

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)

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

Name	Neil Martin
Address and Postcode	martin town planning ltd on behalf of Force 9 Energy East End Park, Halbeath Road, Dunferline, KY12 7RB
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="Policy ER1"/>	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.

Criteria (g) of Policy ER1A should be deleted.

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

See attached Statement setting out in detail the basis for the above representations

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**REPRESENTATION ON THE PROPOSED  
PERTH & KINROSS LOCAL DEVELOPMENT PLAN**

**29 MARCH 2012**

**martin town planning ltd.**

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Appendix 1: PKC LDP Representation Form

Status	FINAL
Project Reference	2012 – 0209
Date of Issue:	29 March 2012

# 1. Introduction

- 1.1 This Representation has been made on behalf of Force 9 Energy in respect of the emerging development plan policy relevant to onshore wind farm proposals.
- 1.2 Force 9 Energy is a small UK based wind farm Development Company. Formed in 2002, the company is passionate about the need to utilise the natural environment and onshore wind capacity to deliver the country's energy needs from renewable resources.
- 1.3 Force 9 Energy is currently developing seven wind farm projects throughout the UK and has completed development of two other projects which are now operational (Markhill in Dumfries and Galloway and Alltwalis in South Wales).
- 1.4 Of the seven projects in development, two have been consented for construction which is expected to be complete in 2013. A pipeline of other projects is at pre-development stage including the Company's Mull Hill project which is the subject of a live Planning Application before Perth & Kinross Council (reference 11/02151/FLM).
- 1.5 All of Force 9's development sites are carefully selected after a lengthy process which takes into consideration issues such as landscape sensitivities as well as planning, environmental and technical criteria, and the company ensures that active and meaningful consultation takes place with the community on each development.
- 1.6 Having reviewed the proposed Local Development Plan (LDP) it is our view that proposed Policy ER1 (Renewable and Low Carbon Energy Generation) and Policy ER6 (Managing Future Landscape Change to Conserve and Enhance the Diversity and Quality of the Area's Landscapes) would benefit from revision in light of current National Planning Policy.
- 1.7 Specific areas of concern with regard to Policy ER1A (New Proposals) are with the following criteria:

*(b) The contribution of the proposed development towards meeting carbon reduction targets.*

*(g) Any positive or negative effects they may have on the local or Perth & Kinross economy either individually or cumulatively.*

- 1.8 In addition, there is concern over the way the Policy is couched in terms of community led schemes, specifically the phrasing of the last element of ER1A:

*Proposals for the development of renewable or low carbon sources of energy by a community may be supported where the development does not meet all of the above requirements, provided it has been demonstrated that there will not be significant environmental effects and the only community significantly affected by the proposal is the community proposing and developing it.*

- 1.9 With regard to Policy ER6, the introductory paragraph is of specific concern in terms of the very high Policy test that this establishes through the phrasing:

*Development and land use change should be compatible with the distinctive characteristics and features of Perth & Kinross's landscapes. Accordingly, development proposals will be required to conserve and enhance the landscape qualities of Perth and Kinross.*

- 1.10 Specifically, whilst perhaps a laudable aspiration, the concern raised here is that in effect no development proposal within the rural parts of Perthshire could meet this Policy test.

- 1.11 These issues are addressed in turn within the following sections.

### 3. Representation 2: Policy ER1A - Economic Impacts

- 3.1 Criteria (g) of Policy ER1A Renewable and Low Carbon Energy Generation (New Proposals) indicates that proposals will be reviewed in the context of:

*Any positive or negative effects they may have on the local or Perth & Kinross economy either individually or cumulatively.*

- 3.2 It has been found to be notoriously difficult to define what the economic implications may be of a wind farm development. A series of decisions issued by the DPEA have shown that any discussions on economic impacts tend to result in inconclusive findings.
- 3.3 To set the wider context on this, it is perhaps relevant to consider how economic impact may materialise based on the approach taken in various DPEA issued decisions as well as the research findings of Glasgow Caledonia University and others following a study they undertook on the Economic Impacts of wind farms on Scottish Tourism on behalf of the Scottish Government in 2008.
- 3.4 The essence of the issue appears to be the case that as wind farms are in rural locations (to access the wind resource) they will impact on peoples' enjoyment of those areas which may consequentially reduce visitor / tourism numbers and hence the economic return that perhaps fragile rural economies may accrue from what may be reduced visitor / tourism numbers.
- 3.5 However, the 2008 research ultimately concluded that the impact of wind farms on tourism was very small and indeed, could be hardly noticed. The figures quoted for one of the study areas that included Perth & Kinross was that less than 1% of total estimated tourism expenditure would be lost as a result of wind farm developments.
- 3.6 The 2008 Report does not conclude that tourism impacts could be ignored and in our view, this remains a reasonable expectation of any application. However, the inherent difficulties that would arise from seeking to quantify in detail all economic impacts of a proposed development beyond perhaps high level assessments, would suggest that an explicit policy expectation of this is overstated.
- 3.7 It would be the expectation that effectively any wind farm application would be supported by an Environmental Statement which in turn would

be required to consider a wide spectrum of possible impacts in terms of the natural and cultural heritage of an area, as well as socio-economic impacts. Indeed, the consideration of landscape impact could be extrapolated to offer an indication of effect on visitor / tourism numbers i.e. an acceptable landscape impact could be assumed to have negligible effect on visitor / tourism enjoyment of the area.

- 3.8 It would therefore appear to us that any robust and competent application supported by an Environmental Statement will be sufficient to have due regard to largely undefinable (and insignificant) economic impacts without the need for a specific policy criteria to that effect.
- 3.9 On the basis of the above, we would request that criteria (g) is deleted from LDP Policy ER1A.

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**

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

Name	Neil Martin
Address and Postcode	martin town planning ltd on behalf of Force 9 Energy East End Park, Halbeath Road, Dunferline, KY12 7RB
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.	Policy ER1	or			
Site ref.		or			
Chapter		Page no.		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 final paragraph of Policy ER1A should be revised to state general support for community led schemes (in line with Scottish Government Policy) but any consideration of proposals must follow the same approach as any other proposal.

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

See attached Statement setting out in detail the basis for the above representations

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**REPRESENTATION ON THE PROPOSED  
PERTH & KINROSS LOCAL DEVELOPMENT PLAN**

**29 MARCH 2012**

**martin town planning ltd.**

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Appendix 1: PKC LDP Representation Form

Status	FINAL
Project Reference	2012 – 0209
Date of Issue:	29 March 2012

# 1. Introduction

- 1.1 This Representation has been made on behalf of Force 9 Energy in respect of the emerging development plan policy relevant to onshore wind farm proposals.
- 1.2 Force 9 Energy is a small UK based wind farm Development Company. Formed in 2002, the company is passionate about the need to utilise the natural environment and onshore wind capacity to deliver the country's energy needs from renewable resources.
- 1.3 Force 9 Energy is currently developing seven wind farm projects throughout the UK and has completed development of two other projects which are now operational (Markhill in Dumfries and Galloway and Alltwalis in South Wales).
- 1.4 Of the seven projects in development, two have been consented for construction which is expected to be complete in 2013. A pipeline of other projects is at pre-development stage including the Company's Mull Hill project which is the subject of a live Planning Application before Perth & Kinross Council (reference 11/02151/FLM).
- 1.5 All of Force 9's development sites are carefully selected after a lengthy process which takes into consideration issues such as landscape sensitivities as well as planning, environmental and technical criteria, and the company ensures that active and meaningful consultation takes place with the community on each development.
- 1.6 Having reviewed the proposed Local Development Plan (LDP) it is our view that proposed Policy ER1 (Renewable and Low Carbon Energy Generation) and Policy ER6 (Managing Future Landscape Change to Conserve and Enhance the Diversity and Quality of the Area's Landscapes) would benefit from revision in light of current National Planning Policy.
- 1.7 Specific areas of concern with regard to Policy ER1A (New Proposals) are with the following criteria:

*(b) The contribution of the proposed development towards meeting carbon reduction targets.*

*(g) Any positive or negative effects they may have on the local or Perth & Kinross economy either individually or cumulatively.*

- 1.8 In addition, there is concern over the way the Policy is couched in terms of community led schemes, specifically the phrasing of the last element of ER1A:

*Proposals for the development of renewable or low carbon sources of energy by a community may be supported where the development does not meet all of the above requirements, provided it has been demonstrated that there will not be significant environmental effects and the only community significantly affected by the proposal is the community proposing and developing it.*

- 1.9 With regard to Policy ER6, the introductory paragraph is of specific concern in terms of the very high Policy test that this establishes through the phrasing:

*Development and land use change should be compatible with the distinctive characteristics and features of Perth & Kinross's landscapes. Accordingly, development proposals will be required to conserve and enhance the landscape qualities of Perth and Kinross.*

- 1.10 Specifically, whilst perhaps a laudable aspiration, the concern raised here is that in effect no development proposal within the rural parts of Perthshire could meet this Policy test.

- 1.11 These issues are addressed in turn within the following sections.

## 4. Representation 3: Policy ER1A - Community Led Proposals

- 4.1 The final paragraph of Policy ER1A Renewable and Low Carbon Energy Generation (New Proposals) states:

*Proposals for the development of renewable or low carbon sources of energy by a community may be supported where the development does not meet all of the above requirements, provided it has been demonstrated that there will not be significant environmental effects and the only community significantly affected by the proposal is the community proposing and developing it.*

- 4.2 It is a central thread of land use planning decision making that the “operator” is largely irrelevant and only the “use” (and consequential effects) that are relevant. This has been a well-rehearsed position with regard to retail proposals but also in terms of all other development proposals; wind farm and other renewable energy developments must be no different.
- 4.3 Scottish Planning Policy is quite clear in its preamble on the purpose of the Planning System at paragraph 3:

*Planning guides the future development and use of land. Planning is about where development should happen, where it should not and how it interacts with its surroundings. This involves promoting and facilitating development while protecting and enhancing the natural and built environment in which we live, work and spend our leisure time.*

- 4.4 At no point in this definition is there reference to the promoter of a development and how and where distinctions can be drawn between different classifications of promoter. There must therefore be no distinction within a Planning Policy between those who may promote development and all proposals, regardless of whether they are community led or otherwise, must be subject to the same development management regime.
- 4.5 It may be the case that the assessment of effects of a community led scheme only show adverse impacts on a particular community but in terms of land use planning, that does not automatically make the scheme

otherwise acceptable. Changes will inevitably take place within and around a community that will alter the context of impacts such that any purported community benefit may not remain available to all in that community over time.

- 4.6 Any planning authority is capable of taking cognisance of material considerations in any development management decision making process and it is perhaps only in that context, with the due weight to be accorded to community benefits outweighing the community impact appropriately assessed and documented.
- 4.7 On the basis of the above, we would request that the final paragraph of Policy ER1A should be revised to state general support for community led schemes (in line with Scottish Government Policy) but the consideration of any such proposals must follow the same approach as any other proposal with no deviation on how the Policy may be applied.

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**

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Telephone no.	[REDACTED]
Email address	[REDACTED]

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

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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.	Policy ER6	or			
Site ref.		or			
Chapter		Page no.		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.

Policy ER6 should be revised such that the key Policy test is to have no significant adverse impact on the landscape qualities of Perth and Kinross.

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

See attached Statement setting out in detail the basis for the above representations

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**REPRESENTATION ON THE PROPOSED  
PERTH & KINROSS LOCAL DEVELOPMENT PLAN**

**29 MARCH 2012**

**martin town planning ltd.**

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### Appendices:

Appendix 1: PKC LDP Representation Form

Status	FINAL
Project Reference	2012 – 0209
Date of Issue:	29 March 2012

## 1. Introduction

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- 1.6 Having reviewed the proposed Local Development Plan (LDP) it is our view that proposed Policy ER1 (Renewable and Low Carbon Energy Generation) and Policy ER6 (Managing Future Landscape Change to Conserve and Enhance the Diversity and Quality of the Area's Landscapes) would benefit from revision in light of current National Planning Policy.
- 1.7 Specific areas of concern with regard to Policy ER1A (New Proposals) are with the following criteria:

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*(g) Any positive or negative effects they may have on the local or Perth & Kinross economy either individually or cumulatively.*

- 1.8 In addition, there is concern over the way the Policy is couched in terms of community led schemes, specifically the phrasing of the last element of ER1A:

*Proposals for the development of renewable or low carbon sources of energy by a community may be supported where the development does not meet all of the above requirements, provided it has been demonstrated that there will not be significant environmental effects and the only community significantly affected by the proposal is the community proposing and developing it.*

- 1.9 With regard to Policy ER6, the introductory paragraph is of specific concern in terms of the very high Policy test that this establishes through the phrasing:

*Development and land use change should be compatible with the distinctive characteristics and features of Perth & Kinross's landscapes. Accordingly, development proposals will be required to conserve and enhance the landscape qualities of Perth and Kinross.*

- 1.10 Specifically, whilst perhaps a laudable aspiration, the concern raised here is that in effect no development proposal within the rural parts of Perthshire could meet this Policy test.

- 1.11 These issues are addressed in turn within the following sections.

## 5. Representation 4: Policy ER6 - Landscape Quality

- 5.1 The introduction to Policy ER6 Managing Future Landscape Change to Conserve and Enhance the Diversity and Quality of the Area's Landscapes states:

*Development and land use change should be compatible with the distinctive characteristics and features of Perth & Kinross's landscapes. Accordingly, development proposals will be required to conserve and enhance the landscape qualities of Perth and Kinross.*

- 5.2 It must be recognised that the aspiration to conserve and enhance the landscapes of the area is a worthy one and there are comparable messages set out within Scottish Planning Policy. However, National Policy is not so narrow in setting out the policy context as Policy ER6 appears to be, especially so in terms of this introductory paragraph. The underlying context to National Policy can perhaps be best encapsulated by the statement at paragraph 127 of SPP:

*Landscape in both the countryside and urban areas is constantly changing and the aim is to facilitate positive change whilst maintaining and enhancing distinctive character.*

- 5.3 What SPP sets out is the obligation to facilitate change (i.e. development) where this does not prejudice the maintenance and enhancement of character but, in our interpretation, does not obligate that change to deliver the enhancements (albeit change must maintain character to presumably be defined positive).
- 5.4 Given that many (if not all) wind farm development will be the subject to the Environmental Impact Assessment process that will inform the subsequent decision making process, it may be useful to use the 2011 EIA Regulations to offer additional guidance on the assessment of impacts and effects.
- 5.5 Ultimately, EIA is required when a proposed development has the potential to have significant impacts on the environment by virtue of its nature, size of location (Regulation 2). In this, it is evident that the consideration is then limited to the identification of significant effects (Schedule 4); some effects will be significant and some not. In addition, some effects will be positive and some adverse; the key for any decision making process is then to

weigh up the significant adverse impacts (individually, in combination and cumulatively) against any positive impacts.

- 5.6 The EIA process is also obligated to consider the means to mitigate any significant impacts arising and to identify the means to reduce these to less or not significant status wherever possible.
- 5.7 How the significance of an impacts is assessed distils down to an assessment of the sensitivity of the receptor and magnitude of impact arising; the greater the sensitivity and magnitude, the greater the significance.
- 5.8 This brief summary of the approach involved in considering the effects of a development demonstrates that the underlying task is to balance various factors and offer a reasonable and justified conclusion. The position presented by proposed Policy ER6 is exact and inherently limiting to any and every development proposal in that they will be generally incapable of demonstrating the maintenance and enhancement of landscape character.
- 5.9 When this position is combined with criteria (c) and (d) of proposed Policy ER6, the Policy as a whole becomes very negative and restrictive and as such wholly contrary to National Policy that sets the requirement to *facilitate positive development*.
- 5.10 On the basis of the above, we would request that the second sentence of the introductory paragraph of Policy ER6 should be revised as follows:

*Accordingly, development proposals will be required to ~~conserve and enhance~~ demonstrate they have no significant adverse impacts on the landscape qualities of Perth and Kinross.*

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.

**TAYMOUTH ESTATES LIMITED**

**PROPOSED RESIDENTIAL DEVELOPMENT:  
KENMORE HOUSING SITE H42**

**REPRESENTATIONS ON THE PROPOSED  
PERTH & KINROSS LOCAL DEVELOPMENT PLAN**

**09 APRIL 2012**

**martin town planning ltd.**



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### Appendices:

#### Appendix 1: Representation Form

Status	FINAL
MTP Reference	2012-0202
Date of Issue:	09 April 2012



## 1. Introduction

- 1.1 These representations have been made on behalf of Taymouth Estates Limited to highlight relevant matters related to the proposed housing allocation reference H42 within Kenmore.
- 1.2 A key issue underlying these Representations relates to the fact that the local community has been seeking to re-invigorate itself through retention of families and other permanent residents within the village. That is partly related to the major leisure based developments that are planned and taking place in and around Kenmore (such as at Taymouth Castle, Kenmore Hotel and Croft na Caber) which will generate an element of demand for residential development in the wider Breadalbane area that could be met within Kenmore if sufficient land is allocated.
- 1.3 However, for some time, properties in and around Kenmore have been lost to the general housing market as individuals realise aspirations and acquire properties as a second home / holiday home. This has been at the unfortunate cost to the local community who find themselves priced out of the housing market. As such there is now a recognised lack of affordable housing (delivered through public sector support mechanisms and / or in terms of price bracket) within the area.
- 1.4 It is recognised that the proposed Local Development Plan (pLDP) reaffirms the proposed development by Perthshire Housing Association to the east of Taymouth Drive. The proposed Plan also includes the H42 housing site adjacent to the PHA site which is supported by our Client, who owns the land. However, we have concerns as to the manner in which the allocation is set out within the proposed Local Development Plan and accordingly seek, through these representations, to have that modified.
- 1.5 These representations therefore
  - Agree with the general principle of the H42 allocation within the Local Development Plan;
  - Seek changes to the wording of the Plan in terms of the expectations of site H42; and
  - Seek an extension to the H42 allocation such that a better urban form could be delivered.

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## 2. The Development Potential

- 2.1 The H42 site is located at the end of a relatively utilitarian extension to Kenmore (Taymouth Drive) that has brought the village “through” the Main Gate to Taymouth Castle Estate into the estate grounds.
- 2.2 The existing housing on Taymouth Drive opposite the primary school has evolved on a linear pattern following the river bank. This lack of any strategic masterplan has resulted in the townscape to the east of the Kenmore Gates having no considered termination to the settlement boundary, nor any meaningful enclosure of space created by the built environment. An opportunity exists to create an architectural “full stop” to the eastern boundary of Kenmore, along with enclosed, wall designed landscaped amenity spaces that will better respect the character and legacy of the original planned estate village.
- 2.3 This area is part of the Taymouth Castle Designed Landscape albeit, in agreeing that site H42 should be included within the proposed Local Development Plan, the Council has effectively acknowledged that impacts on the designed landscape can be suitably addressed and mitigated. Any impacts however will be lessened by the context of the site (Taymouth Drive and Kenmore Primary School) and the opportunity afforded by the development of this area as visioned to effect an overall enhancement in the urban form and make this part of Kenmore more in keeping with the wider urban form.
- 2.4 The Council has set a requirement for H42 that 25% should be affordable housing and the expectation is that those units would be a mix of low cost home ownership and shared equity properties. Discussions with relevant bodies in due course will identify the most appropriate form and nature of these units. The remainder of the site would be developed with a mix of house sizes and be targeted at the mid to lower owner occupier markets.
- 2.5 Building forms would echo the mass form and grouping of the Kenmore Square, varying between one and a half and two storey with dormers, porches and other architectural features that will sit harmoniously in relation to the character of the Kenmore Conservation Area.
- 2.6 The proposed development will draw on the model of the existing Kenmore Village by providing amenity spaces created by new housing, and

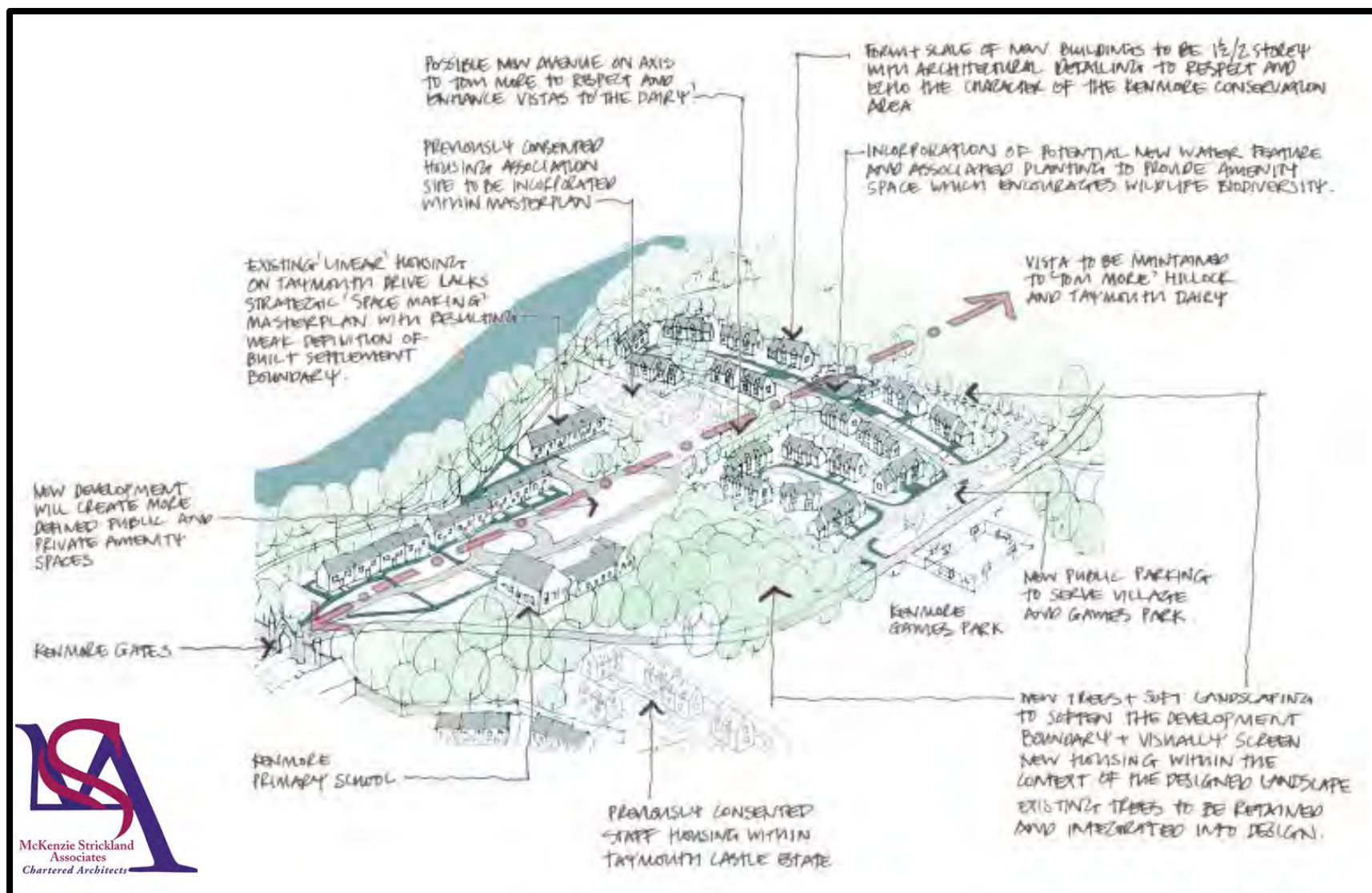
in embracing the primary school which would benefit from a close relationship to the new development.

- 2.7 Public permeability through the site would be accommodated within the design to encouraged and improve access to the riverbank walks and other core path networks within Taymouth estate.
- 2.8 In addition to parking for the private housing, much needed additional public parking could be provided to serve the village with proximity to the playing fields would provide essential public parking for community events such as the Highland Games in the Summer and other important events held at this site throughout the year
- 2.9 The public amenity space would incorporate hard and soft landscaping to establish enhanced public enjoyment of the views to the Taymouth castle estate. This could include SUDS pond or other landscaping features that would also help encourage wildlife biodiversity.
- 2.10 Existing views and vistas to the Designed Landscape would be respected in the development design, for instance by creating new vehicular and pedestrian avenues that respect the key views and vistas to Tom More and the Taymouth Castle Estate Dairy.
- 2.11 Strategically positioned new trees and soft landscaping would help soften the development boundary and mitigate any perceived visual impact on the designed landscape.
- 2.12 Discussions were held with Perth & Kinross Council and Historic Scotland in the context of the latest planning application for redevelopment of Taymouth Castle Estate. At that time, it was agreed that when travelling eastward into the Estate, it is not until one passes the Tom na Croiche woodland area (to the east of the Sports Ground) that the true feeling of being within a nationally important landscape is realised. This is due to the fact that whilst the actual designed landscape designated extends to the edge of Kenmore (and the Main Gate) between these two points changes that have taken place (Taymouth Drive etc) that have fundamentally altered the context of the spaces.
- 2.13 At Tom na Croiche, the landscape opens up to the right (south) and left (north) and only then can the combination of wide open spaces and majestic woodlands begin to be fully appreciated. Respecting this fact, the

enlarged site H42 does not extend east beyond that point to maintain the current balance between key features of the designed landscape.

- 2.14 The extended development frontage will also assist in incorporating the Sports Ground into the extended settlement and the influx of new residents will be able to make use of this as a focal point for the community. To further assist this, parking can be provided within the site adjacent to the Taymouth Castle drive for those who live in more dispersed parts of the community and visitors, to use.
- 2.15 Appropriate legal controls would be identified and introduced to ensure that the private sale properties were used as permanent residences rather than these become further holiday properties / second homes.
- 2.16 The image below sets out how the development vision for an extended site H42 could be accommodated without any significant adverse impacts on the landscape cultural heritage features or natural heritage.

Figure 2.1: Development Vision for Kenmore East (H42 extended)



### **3. Maintaining an Appropriate Housing Land Supply**

- 3.1 Our client supports the principle of the allocation of site H42 as this starts to meet with the expectations of the development plan with regard to what should constitute an appropriate housing land supply policy framework. However, the reality is that an extended allocation will generate greater associated benefits.
- 3.2 The Development Plan Policy framework for housing land supply is tasked with ensuring that sufficient land in appropriate locations is allocated to meet assessed housing needs. The target number for need is assessed at a strategic level and the development plan must then take a view on how quickly sites could come forward to meet those needs.
- 3.3 The Plan, in maintaining the required land supply throughout its lifetime, must also ensure that at the end of the plan period, sufficient land continues to be made available, i.e. maintaining a five (and ideally 7) year land supply requires at least 10 years' worth (but ideal 14) of housing land to be available (or have sufficient certainty that it can become available) during the Plan's lifetime.
- 3.4 It is also imperative that if large sites are part of the land supply, only those elements that will contribute to meeting needs during the Plan period (and / or the five or seven years beyond the end of that period) are counted within the supply.
- 3.5 It may be that an element of a larger site could be brought forward and delivered more quickly if supply were to fall, but that is not necessarily guaranteed as any site will deliver completions at a rate defined by market conditions (and currently defined by availability of mortgages) rather than the rate a developer can produce completed units. In addition, with any site, but perhaps more so with larger sites, thresholds in site capacity may trigger further necessary infrastructure investments; the ability to deliver those investments sometimes then dictating the rate of house completion.
- 3.6 It is also important that there is sufficient flexibility in the land supply; large sites offer a degree of that flexibility, but additional sites will be required to be able to be brought forward if issues arise in the deliverability of land elsewhere such as problems with developers being able to bring the site forward through insurmountable infrastructure constraints.

- 3.7 The current economic challenges have had a profound impact on housing land supply in that sites have become stalled through an inability of developers or potential purchasers to access the required funding. It is anticipated that such matters will be overcome through the lifetime of the LDP and that potential is acknowledged in paragraphs 2.4.6 to 2.4.8 of the pLDP and specifically the Plan, at paragraph 2.4.8, states that it must:

*. . . be able to respond to any economic upturn and ensure that the lack of effective housing land does not become a constraint on general economic recovery.*

- 3.8 What Scottish Planning Policy says on the issue of land supply expectations is neatly encapsulated in the statements:

*The Scottish Government is committed to increasing the supply of new homes and the planning system should contribute to raising the rate of new housebuilding by identifying a generous supply of land for the provision of a range of housing in the right places*

Paragraph 66

And

*The delivery of housing through the development plan to support the creation of sustainable mixed communities depends on a generous supply of appropriate and effective sites being made available to meet need and demand, and on the timely release of allocated sites.*

Paragraph 70

- 3.9 We believe that this subject site, in the location that it is, can offer a valuable contribution to ensuring that at least some degree of flexibility is offered by the Plan, albeit this is only a relatively small contribution. The subject site can also make a modest but important contribution to the delivery of affordable housing in this area and critically can assist to enhance the permanent resident community within Kenmore.



## 4. Delivering a Viable Development Option

- 4.1 Meeting numerical targets is however not at the core of the Plan, albeit these must guide the scale of allocations deemed appropriate. Place-making is placed very high on the agenda of both the Strategic Development Plan and the proposed Local Development Plan.
- 4.2 The pLDP's first Policy (Policy PM1) is specifically concerned with place-making and this is set out in 3 parts, the first of which sets an overall expectation for sites:

### *Policy PM1A*

*Development must contribute positively, to the quality of the surrounding built and natural environment. All development should be planned and designed with reference to climate change, mitigation and adaptation.*

*The design and siting of development should respect the character and amenity of the place, and should create and improve links within and, where practical, beyond the site. Proposals should also incorporate new landscape and planting works appropriate to the local context and the scale and nature of the development.*

- 4.3 The preliminary stages on master planning this site, as set out in Section 2 of this Submission demonstrate that care and attention to the concept of place-making has been adopted. Care and consideration has been applied to possible implications for the natural and built environment and the concepts presented can be brought forward without adverse impact on either.
- 4.4 Consideration has also been had of views through and from the development proposals to ensure that long term effect on the Designed Landscape are conserved.
- 4.5 The second part of the Policy sets a series of criteria which are to be met by any development:

### *Policy PM1B*

*All proposals should meet all the following place-making criteria:*

*(a) Create a sense of identity by developing a coherent structure of streets, spaces, and buildings, safely accessible from its surroundings.*

*(b) Consider and respect site topography and any surrounding important landmarks, views or skylines.*

*(c) The design should complement its surroundings in terms of appearance, height, scale, massing, materials, finishes and colours.*

*(d) Respect an existing building line where appropriate, or establish one where none exists. Access, uses, and orientation of principal elevations should reinforce the street or open space.*

*(e) All buildings, streets, and spaces (including green spaces) should create safe, accessible, inclusive places for people, which are easily navigable, particularly on foot, bicycle and public transport.*

*(f) Buildings and spaces should be designed with future adaptability in mind wherever possible.*

*(g) Existing buildings, structures and natural features that contribute to the local townscape should be retained and sensitively integrated into proposals.*

- 4.6 The third element of the Policy is relevant to larger sites (over 200 houses or 10 ha) and as such is not directly relevant to the proposals for Kenmore East.
- 4.7 Considering the above policy criteria in the round, it is evident that each of these can be incorporated into an appropriate site master-planning exercise for an enlarged H42, the larger site offering significantly greater opportunities as suggested through the indicative sketch included as part of this submission.
- 4.8 Any master planning exercise is required to consider the development in the round, taking due cognisance of the wider setting of the site and of the impacts and opportunities generated by the site on adjacent uses / users. These aspects have already been incorporated into the preliminary master-planning work as demonstrated in Section 2 of this submission.

- 4.9 Ultimately, this development is a response to concerns raised by the local community as to an increasing dilution of community identity. The response is then to generate the option for community identity to be re-kindled and enhanced through the retention and introduction of permanent residents who work in the area.
- 4.10 Those residents will require affordable housing in all its forms (that is both subsidy supported but is also market entry housing) given the position of the housing market within the area. Appropriate mechanisms will be required to ensure the non-subsidised houses remain as permanent residences rather than become holiday properties and such mechanisms can be developed as the project progresses.
- 4.11 Opportunities for meeting additional parts of the housing market can also be generated through this site but as with the low cost housing, the underlying intent behind the development is to ensure these too remain as permanent residences. However, and this is the critical concern, the Plan at present sets a position whereby that option, and hence the overall viability of the proposals, is prejudiced.
- 4.12 In reference to a requirement for 25% Affordable Housing (a position that the landowner accepts as reasonable), the understanding drawn from conversations with various officers at Perth & Kinross Council is that this element of housing would be a combination of low cost home ownership or shared equity, rather than social rented housing. Therefore, in setting an apparent requirement that the remainder of the site is “low cost housing” (or staff accommodation), would suggest that the Council is effectively seeking a 100% affordable housing contribution from this site.
- 4.13 Robust representations to the Council in advance of the proposed Plan being published highlighted the inherent difficulties of seeking this allocation with a 50% affordable housing contribution; a position subsequently accepted by the Council.
- 4.14 However, the crux of this housing site, in line with the Council’s own aspirations on place making, is to offer up a balance within the development that can only be provided if a wider housing market offer is available. It is evident from the preliminary work undertaken by the project architects that a mixed tenure and market housing development (affordable, lower market and mid-market housing) can be delivered on this site and that mix will then deliver a viable development option.

- 4.15 If the development is not viable, it is unlikely to be progressed which in turn would render impossible the realisation of what is a relatively modest number numerically, but important nevertheless, of affordable houses. As it is, the current Plan would see 5 affordable houses being provided, whereas the enlarged site would increase this to at least 8 affordable housing units (which is close to the initial expectation of planning officers in suggesting the 50% requirement).
- 4.16 A central part of the place-making agenda is to encourage the development of local community and community identity. Like many small settlements, community identity is retained but each year this is eroded a little more as the permanent community reduces. It is therefore an important objective to ensure that this risk is addressed through appropriate development proposals being brought forward which this site can deliver with a more appropriate development plan context.

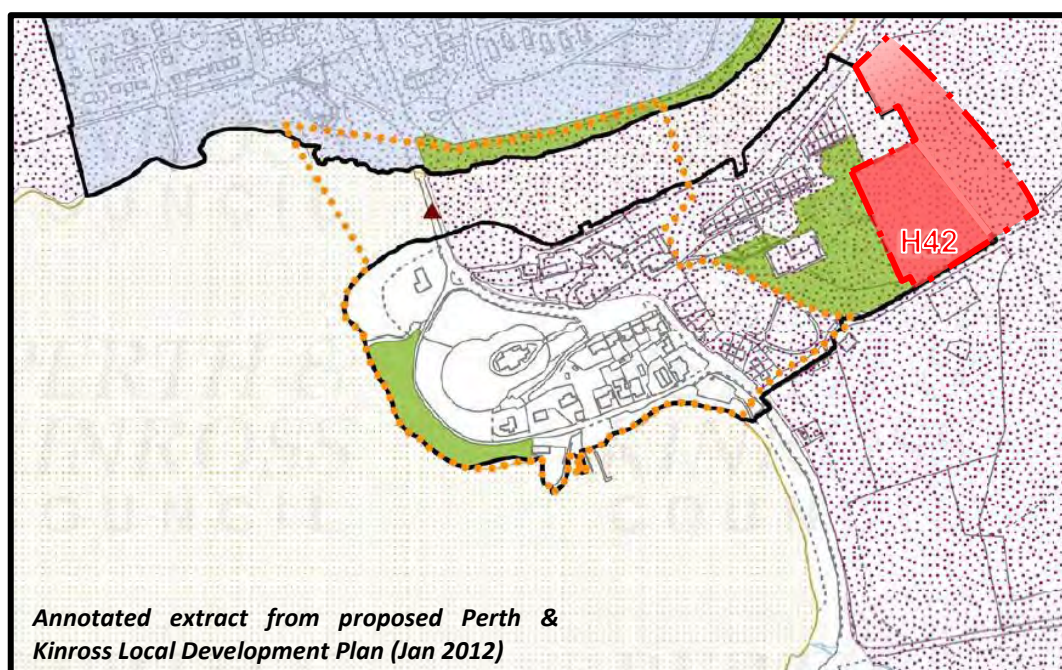
## 5. Summary of Representation

5.1 The preceding commentary confirms the benefits of allocating this land for development in terms of meeting development plan requirements as well as delivery tangible enhancements to the local community. The issues raised on behalf of Taymouth Estates Limited therefore relate to 1 fundamental representation on the proposed Local Development Plan which is set out below.

5.2 The proposed entry within the LDP should be revised to read:

Ref	Location	Size	Number
H42	East of Primary School	<del>0.8 ha</del> <b>1.6 ha</b>	<del>20</del> <b>c30</b> houses, 25% affordable, remainder low cost <b>and /or mid-market</b> housing <del>or staff accommodation</del>
<b>Site Specific Developer Requirements:</b> <ul style="list-style-type: none"> <li>• Flood Risk Assessment.</li> <li>• Road and access improvements to the satisfaction of the Council as Roads Authority.</li> <li>• Built form and layout should respond appropriately to the landscape and strengthen the character of Kenmore as a distinctive place.</li> <li>• Enhancement of biodiversity and protection of habitats.</li> <li>• Design to incorporate existing trees.</li> </ul>			

5.3 The H42 site boundaries should also be revised as follows:



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## Appendix 1: Representation Form

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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	Neil Martin
Address and Postcode	martin town planning ltd on behalf of Taymouth Estates Limited East End Park, Halbeath Road, Dunfermline, KY12 7RB
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.	Site H42, Kenmore	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.

Whilst there is support for this allocation, it is necessary to modify the restrictive nature of the description of development as set out for the H42 as well the the extent of the site as shown in the proposed Plan

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

Please refer to the supporting submission for full justification for proposed changes.

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

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**martin town planning ltd**

**East End Park  
Halbeath Road  
Dunfermline  
Fife  
KY12 7RB**

**FT PROPERTY INVESTMENTS LTD**

**PROPOSED RESIDENTIAL DEVELOPMENT  
OPPORTUNITY: KENMORE SOUTH**

**REPRESENTATIONS ON THE PROPOSED  
PERTH & KINROSS LOCAL DEVELOPMENT PLAN**

**09 APRIL 2012**

**martin town planning ltd.**



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### Appendices:

Appendix 1: An Assessment of Environmental Effects

Appendix 2: Kenmore South Feasibility Appraisal November 2011

Appendix 3: Representation Forms

Status	FINAL
MTP Reference	2011-0107
Date of Issue:	09 April 2012

## 1. Introduction

- 1.1 These representations have been made on behalf of FT Property Investments Ltd in order to highlight the significant potential that exists through allocation of additional development land within Kenmore. Those benefits can be realised through allocation of the land that would be in line with the development plan objectives and without adverse impact on social or environmental factors.
- 1.2 The key issue underlying these Representations relate to the fact that the local community has been seeking to re-invigorate itself through retention of families and other permanent residents. That is partly related to the major leisure based developments that are planned and taking place in and around Kenmore (such as at Taymouth Castle, Kenmore Hotel and Croft na Caber) which will generate an element of demand for residential development in the wider Breadalbane area that could be met within Kenmore if sufficient land is allocated.
- 1.3 However, for some time, properties in and around Kenmore have been lost to the general housing market as individuals realise aspirations and acquire properties as a second home / holiday home. This has been at the unfortunate cost to the local community who find themselves priced out of the housing market. As such there is now a recognised lack of affordable housing (delivered through public sector support mechanisms and / or in terms of price bracket) within the area.
- 1.4 It is recognised that the proposed Local Development Plan (pLDP) reaffirms the proposed development by Perthshire Housing Association to the east of Taymouth Drive and the Plan also proposes a housing site adjacent to that (H42). However, it is the belief of FT Property Investments Ltd, based on feedback they have received through discussions with representatives within the Local Community, that additional housing opportunities are needed over and above those existing proposed allocations.
- 1.5 This Report summarises what the development opportunity across land known as Kenmore South could entail. It then considers strategic aspects, related to the need to allocate additional, smaller housing sites within Perth & Kinross as well as the more specific community enhancements this development could deliver. A penultimate section assesses a potential allocation in terms of development plan objectives, expectations and

requirements before a summary of the key issues behind this Representation is provided.

- 1.6 An Appendix, giving due consideration of factors relevant in the Strategic Environmental Assessment of potential sites, is also provided. A second Appendix containing a feasibility appraisal of the site that brings together comments on flood risk and an analysis of the site and surroundings is also provided.



## 2. The Development Potential

- 2.1 Following the site appraisal (Appendix 2), designs for a draft masterplan have been reviewed which are considered can unlock the potential of the site, whilst respecting the existing landscape and carefully the impact of development on the setting adjacent to the Kenmore Conservation Area.
- 2.2 In preparing the concept masterplan for the site (figure 2.1 below), key considerations have been:
- Respecting the structure and setting of the C(S) Listed Kenmore Wall that forms the western boundary of the site;
  - Integrating the already consented development in the northern portion of the site with development opportunities to the south (which should be explicitly identified within the proposed Local Development Plan);
  - Recognising and responding to the localised flood risk that is present on this site (largely due to groundwater re-charge and over-topping from Loch Tay during periods of extreme high water plus string westerly winds);
  - Facilitating wider community enhancements (such as access to the games ground and facilities for visitors / Kenmore Beach users);
  - Facilitating the delivery of community facilities and meeting existing community deficits (affordable housing);
  - Respecting valued and important views through and over the site between the A823 and Loch Tay / Ben Lawyers which is recognised as a classic view within Scotland.
- 2.3 The proposed development will draw on the urban model of the existing Kenmore village by providing a new public space created by new mixed use buildings. The public space can incorporate hard and soft landscaping and seating areas to establish enhanced public enjoyment of the views to Loch Tay.
- 2.4 Buildings form would echo the mass form and grouping of the Kenmore Square, varying between one and a half and two storey and with localised 3 storey elements to provide architectural features to signal the public

space; in the same manner that the 3 and a half storey Kenmore hotel addresses the existing village square.

- 2.5 The residential buildings would be arranged to respect the existing density of the existing village and using detached and semidetached building forms that echo the character of Kenmore Village. The central area of the site would remain free of new structures to take cognisance of the potential flood risk and to help maintain key views from Tom na Croich to Loch Tay.
- 2.6 In order to encourage better public permeability through the site and improve access between the loch beach and existing playing fields, this area could contain new public landscaped areas and enhanced children's play facilities as well as facilitate an enhanced safe route to school.
- 2.7 Much needed new public parking could be provided to serve Kenmore Village located close to the Kenmore Beach and much needed public parking to serve the growing tourist numbers throughout the year. The proximity to the playing fields would provide essential public parking for community events such as the Highland Games in the Summer and other important events held at this site throughout the year.
- 2.8 New vehicular access options have been identified. This could involve adapting the existing opening in the Kenmore Wall at public toilets or creating a new alternative vehicular access south of the Kenmore Wall onto the 20mph speed restriction zone of the A827. A possible secondary access from the north of the site via Taymouth Castle estate may also be possible subject to agreement with the adjoining owner.
- 2.9 Both options could also facilitate the implementation of additional traffic calming measures on the A827 as it passes the west side of the site either as part of the junction construction works or through a separate traffic management order process.
- 2.10 The proposed remodelling to the mounding to Loch Tay beach and of the landscape treatment between the beach area to loch would help prevent flooding to the main road and will improve pedestrian access adjacent to the road in the beach location.

## **Delivering Community Enhancements**

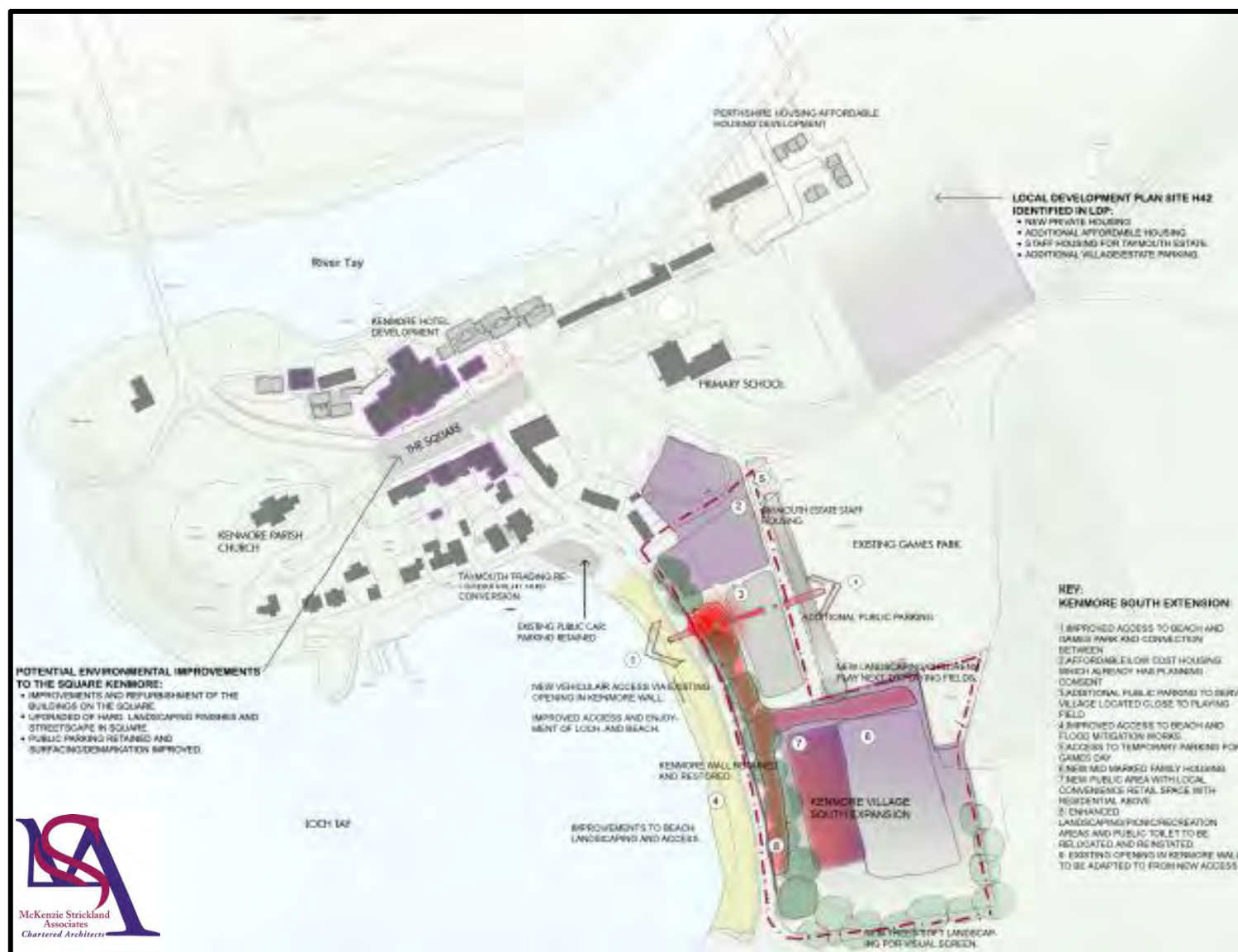
- 2.11 In bringing this site forward for development, there are a number of direct community benefits that can be delivered. These include:

- Potential for lower / mid-market family housing for sale (and permanent residence) which also includes for affordable housing (social rented & shared equity)
- Potential for enhanced local facilities in the area (visitor parking, retail, artisan centre / workshops)
- Potential to improve access to / parking for the Sports Ground
- Potential for additional visitor facilities (picnic spaces, retail, public toilets)
- Potential for enhancement of Kenmore Square

2.12 These options have been discussed with Kenmore & District Community Council, the local Church of Scotland Minister and the Kenmore Games Field association, each of who has recognised the significant potential, and overall betterment for Kenmore village, that could arise.

2.13 However, part of this overall area already benefits from planning permission (granted as part of the planning permission for the redevelopment of Taymouth Castle Estate; 03/02250/PPLB). It would therefore be expected that a site, corresponding to that part of the proposals for the wider redevelopment, would have been identified within the pLDP.

Figure 2.1: Concept Masterplan for Kenmore South



### **3. Maintaining an Appropriate Housing Land Supply**

- 3.1 The basis of any development plan housing land supply policy framework has been to ensure that sufficient land in appropriate locations is allocated to meet assessed housing needs. The target number for need is assessed at a strategic level and the development plan must then take a view on how quickly sites could come forward to meet those needs.
- 3.2 The Plan, in maintaining the required land supply throughout its lifetime, must also ensure that at the end of the plan period, sufficient land continues to be made available, i.e. maintaining a five (and ideally 7) year land supply requires at least 10 years' worth (but ideal 14) of housing land to be available (or have sufficient certainty that it can become available) during the Plan's lifetime.
- 3.3 It is also imperative that if large sites are part of the land supply, only those elements that will contribute to meeting needs during the Plan period (and / or the five or seven years beyond the end of that period) are counted within the supply.
- 3.4 It may be that an element of a larger site could be brought forward and delivered more quickly if supply were to fall, but that is not necessarily guaranteed as any site will deliver completions at a rate defined by market conditions (and currently defined by availability of mortgages) rather than the rate a developer can produce completed units. In addition, with any site, but perhaps more so with larger sites, thresholds in site capacity may trigger further necessary infrastructure investments; the ability to deliver those investments sometimes then dictating the rate of house completion.
- 3.5 It is also important that there is sufficient flexibility in the land supply; large sites offer a degree of that flexibility, but additional sites will be required to be able to be brought forward if issues arise in the deliverability of land elsewhere such as problems with developers being able to bring the site forward through insurmountable infrastructure constraints.
- 3.6 The current economic challenges have had a profound impact on housing land supply in that sites have become stalled through an inability of developers or potential purchasers to access the required funding. It is anticipated that such matters will be overcome through the lifetime of the LDP and that potential is acknowledged in paragraphs 2.4.6 to 2.4.8 of the pLDP and specifically the Plan, at paragraph 2.4.8, states that it must:

*... be able to respond to any economic upturn and ensure that the lack of effective housing land does not become a constraint on general economic recovery.*

- 3.7 Looking at the underlying requirements of the Plan, the TAYplan Strategic Development Plan sets an expectation that within the Highland Area some 80 housing completions per annum would be achieved which then equates to a total expectation (or requirement) that the Highland area as a whole would deliver some 1,600 houses between 2012 and 2023 and therefore would be obligated to have land available to deliver 400 houses at any time (the 5 year land supply) rising to land for 560 houses available at any one time (the 7 year land supply).
- 3.8 The pLDP states that the Plan must be capable of delivering 1,120 houses (14 years' worth of land supply) within the Highland Perthshire area; this equating to 7 years of land supply from 2010 plus a further 7 years land available at the end of the Plan period in 2017.
- 3.9 The total requirement (i.e. the number of houses that require to be completed) is then adjusted to provide a LDP target for Highland Perthshire. The table at paragraph 6.1.10 in the pLDP summarises this by subtracting completions achieved between 2010 and 2011 (100 units) and the current effective land supply (land that is expected to come forward during the next 5 years (190 units). However, 3 further adjustments are then made in terms of windfall land supply (10% of the total requirement) and an allowance for small sites (15% of total requirement).
- 3.10 It is accepted that the contribution of small sites within Highland Perthshire is significant and as such, unlike other areas, an appropriate allowance should be incorporated. However, adding an allowance for windfall is perhaps less justified.
- 3.11 The pLDP summarises the expectation of the Strategic Development Plan:

*... in order to meet projected population increases approximately 80 houses will be required per year.*

Paragraph 6.1.9

- 3.12 This statement implies that the pLDP is to ensure that 80 house completions per annum can be achieved and, in light of the position presented in Scottish Planning Policy, must be further interpreted as a minimum requirement.

- 3.13 What Scottish Planning Policy says on the issue of land supply expectations is neatly encapsulated in the statements:

*The Scottish Government is committed to increasing the supply of new homes and the planning system should contribute to raising the rate of new housebuilding by identifying a generous supply of land for the provision of a range of housing in the right places*

Paragraph 66

And

*The delivery of housing through the development plan to support the creation of sustainable mixed communities depends on a generous supply of appropriate and effective sites being made available to meet need and demand, and on the timely release of allocated sites.*

Paragraph 70

- 3.14 Specifically then in terms of Windfall sites, Planning Advice Note 2/2010: Affordable Housing and Housing Land Audits states at paragraph 62:

*They [Windfall Sites] might be included as part of the established supply in the audit as a result of an urban capacity study where the site is considered to have potential for housing development. These sites should count towards meeting the housing land requirement only once planning permission has been granted for residential development and it is considered to be effective or is being developed.*

- 3.15 This comment is therefore quite explicit in the terms of how and when windfall sites can be incorporated into any calculations of the necessary land supply; only once they have come forward with no expectations that an assumption of what may come forward can or should be relied upon. Previous incarnations of the Planning Advice Note referred to windfall sites as offering a further element of flexibility; something that is wholly missing from the target for land supply set in the pLDP.
- 3.16 Given the above, we have identified a need for revision to table 6.1.10 to the effect that the Windfall allowance is deleted. In addition, an explicit statement should be added to this section that the (revised) target for allocations within the LDP of 660 houses is minimum requirement and that

completions resulting in a supply of up to 10% more than the strategic housing requirement of 1,120 properties, would remain consistent with the aims and objectives of the Strategic Development Plan.

- 3.17 At present, there is an effective land supply of 190 units and even allowing for a 15% small sites allowance, the total current potential five year supply appears to be no more than 360 units; i.e. less than the required 5 year land supply target of 400 units and significantly less than the 7 year and supply target of 560 units.
- 3.18 The emerging plan could deliver additional completions but this presently amounts to potentially only a further 595 units, some of which, such as H44 and H45 in Murthly, may not be deliverable through the Plan period due in that circumstance to education capacity constraints.
- 3.19 With windfall allowances being deleted from the numerical targets, 595 completions will not be sufficient to meet the residual minimum target of 660 units.
- 3.20 Given the statements within SPP regarding an obligation to ensure there is a generous supply of land to meet housing needs; the pLDPs commitment to ensure that housing land supply must not constrain economic recovery; and a more relevant calculation of residual housing land supply targets, the LDP must look to allocate additional land and a suggested approach would be:
  - Identify a range of small to medium housing sites that can be started with minimal need for up front infrastructure investment;
  - Ensure that housing sites can contribute to the underlying place-making agenda by demonstrating tangible community benefits associated with their delivery; and
  - Seek explicit, demonstrable commitments from developers / landowners that they will bring sites forward for development, in line with the LDP during the plan period.



## 4. Meeting the Development Plan's Objectives

- 4.1 Meeting numerical targets is however not at the core of the Plan, albeit these must guide the scale of allocations deemed appropriate. Place-making is placed very high on the agenda of both the Strategic Development Plan and the proposed Local Development Plan.
- 4.2 The pLDP's first Policy (Policy PM1) is specifically concerned with place-making and this is set out in 3 parts, the first of which sets an overall expectation for sites:

### *Policy PM1A*

*Development must contribute positively, to the quality of the surrounding built and natural environment. All development should be planned and designed with reference to climate change, mitigation and adaptation.*

*The design and siting of development should respect the character and amenity of the place, and should create and improve links within and, where practical, beyond the site. Proposals should also incorporate new landscape and planting works appropriate to the local context and the scale and nature of the development.*

- 4.3 The preliminary stages on master planning this site, as set out in Appendix 2, and the approach to site planning as set out in Section 2 of this Submission demonstrate that care and attention to the concept of place-making has been adopted. Care and consideration has been applied to possible implications for the natural and built environment and the concepts presented can be brought forward without adverse impact on either.
- 4.4 Consideration has also been had of views through and from the development proposals to ensure that what some consider iconic panoramas are preserved.
- 4.5 The site planning exercise has extended beyond the site itself and considered adjacent uses and the village as a whole. The potential of this development is that it could unlock significant wider community benefits with Kenmore.
- 4.6 The second part of the Policy sets a series of criteria which are to be met by any development:

*Policy PM1B*

*All proposals should meet all the following place-making criteria:*

*(a) Create a sense of identity by developing a coherent structure of streets, spaces, and buildings, safely accessible from its surroundings.*

*(b) Consider and respect site topography and any surrounding important landmarks, views or skylines.*

*(c) The design should complement its surroundings in terms of appearance, height, scale, massing, materials, finishes and colours.*

*(d) Respect an existing building line where appropriate, or establish one where none exists. Access, uses, and orientation of principal elevations should reinforce the street or open space.*

*(e) All buildings, streets, and spaces (including green spaces) should create safe, accessible, inclusive places for people, which are easily navigable, particularly on foot, bicycle and public transport.*

*(f) Buildings and spaces should be designed with future adaptability in mind wherever possible.*

*(g) Existing buildings, structures and natural features that contribute to the local townscape should be retained and sensitively integrated into proposals.*

- 4.7 The third element of the Policy is relevant to larger sites (over 200 houses or 10 ha) and as such is not directly relevant to the proposals for Kenmore South.
- 4.8 Considering the above policy criteria in the round, it is evident that each of these can be incorporated into an appropriate site master-planning exercise. That exercise is required to consider the development in the round, taking due cognisance of the wider setting of the site and of the impacts and opportunities generated by the site on adjacent uses / users. These aspects have already been incorporated into the preliminary master-planning work as demonstrated in Section 2 and Appendix 2 of this submission.

- 4.9 Through initial contact with local community representatives, broad support was raised as well as suggestions and requests for how the development could and should be progressed; that approach would be progressed through any subsequent site master-planning exercise with community engagement being part of the approach taken
- 4.10 Ultimately, this development is a response to concerns raised by the local community as to an increasing dilution of community identity. The response is then to generate the option for community identity to be re-kindled and enhanced through the retention and introduction of permanent residents who work in the area.
- 4.11 Those residents will require affordable housing in all its forms (that is both subsidy supported but is also market entry housing) given the position of the housing market within the area. Appropriate mechanisms will be required to ensure the non-subsidised houses remain as permanent residences rather than become holiday properties and such mechanisms can be developed as the project progresses.
- 4.12 Opportunities for additional parts of the housing market can also be generated through this site but as will the low cost housing, the underlying intent behind the development is to ensure these too remain as permanent residences.

## **Conclusions**

- 4.13 The principle of development in this general area has already been established through planning permission 03/02250/PPLB. PKC considered there may be some merit in allocating a larger area of land in this area through their Main Issues Report again suggesting that the principle of wider development was at least considered a reasonable option.
- 4.14 At the time of that planning application being considered as well as through and subsequently through the MIR stage, issues of flooding and potential effect on the Designed Landscape / Listed Building (C(s)) were raised which resulted in officer support for the site being reduced.
- 4.15 However, matters of impact and management of flood risk can be incorporated into any site planning and as such, there remains merit in taking forward the wider site as an allocation within the Local Development Plan.

4.16 A central part of the place-making agenda is to encourage the development of local community and community identity. Like many small settlements, community identity is retained but each year this is eroded a little more as the permanent community reduces. It is therefore an important objective to ensure that this risk is addressed through appropriate development proposals being brought forward.

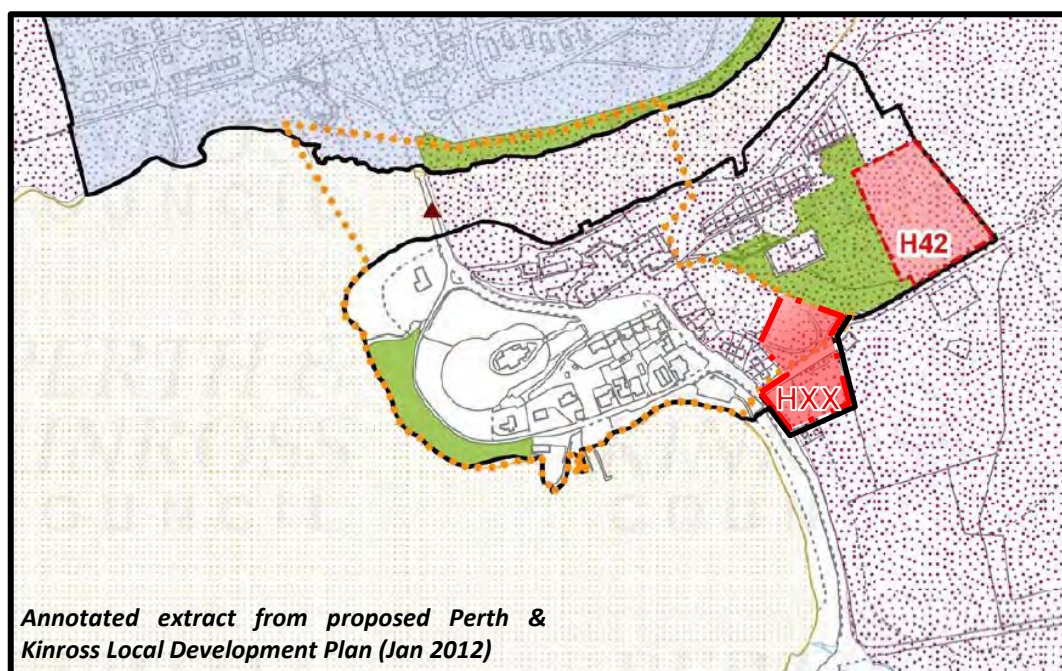
## **5. Summary of Representations**

- 5.1 The preceding commentary sets out the benefits of allocating this land for development in terms of meeting development plan requirements as well as delivery tangible enhancements to the local community. The issues raised on behalf of FT Property Investments Ltd therefore relate to 3 fundamental representations on the proposed Local Development Plan which are summarised on the following pages.

## i. Relevant revisions to the Kenmore settlement boundary

- 5.2 As part of the proposals to redevelop Taymouth Castle Estate as approved by the Council in 2005, development of a parcel of land to the west of the Primary School for 10 houses to provide opportunities for staff accommodation for middle and senior management within the Hotel Resort was also approved.
- 5.3 The intent behind providing staff accommodation opportunities in this area as part of the overall redevelopment of the Estate was to encourage greater integration with the local community. In reflection of the approved residential development at this location, the emerging Local Development Plan should acknowledge this element of the extant planning permission.

**Figure 5.1: Proposed adjustment to Settlement Boundary 001**



- 5.4 The proposed entry within the LDP should then read:

Ref	Location	Size	Number
HXX	West of Primary School	0.6ha	10 houses
<b>Site Specific Developer Requirements:</b>			
<ul style="list-style-type: none"> <li>Site to be developed in line with approved layout / designs as set out in Permission 03/02250/PPLB unless otherwise agreed with PKC</li> </ul>			

## ii. Meeting the obligation on Perth & Kinross Council to maintain an appropriate Housing Land Supply

- 5.5 The proposed Local Development Plan (para 2.4.8) sets, as an underlying expectation and requirement, that the area must:

*... be able to respond to any economic upturn and ensure that the lack of effective housing land does not become a constraint on general economic recovery.*

- 5.6 In reviewing the pLDP, it is evident that what Scottish Planning Policy sets as minimum targets have in fact been interpreted as absolute numerical targets. In addition, in calculating the residual target (through deduction of relevant allowances), the pLDP, in our opinion, wrongly also deducts an allowance for windfall land that should be best regarded as providing a degree of flexibility in meeting strategic land supply targets within the Plan rather than be relied upon to meet what are expected to be planned land releases.
- 5.7 Accordingly, paragraph 6.1.10 and its associated table (as well as corresponding tables for the other Plan areas) should be amended as follows:

The additional land required to meet the projected build rate is calculated through the following:

$$(A) - (B + C + E) = F$$

(A) Housing Land Requirement

(B) Completions 2010–2011

(C) Effective Land Supply

(E) Small Sites (15% of Housing Land Requirement)

(F) Additional Allocation Required

Housing Market Area	A	B	C	E	F
	Housing Land Requirement	Completions 2010-2011	Effective Supply 2011	Small Sites	Additional Allocations Required (*)
Highland	1,120	100	190	170	660

\* the Additional Allocations figure is a minimum expectation of the Plan with total completions to 2024 of up to 1,230 being deemed to continue to reflect the strategic expectations for the Highland Perthshire area where any housing sites that come forward contribute to the Council's place-making agenda.

5.9 In addition, as part of the overall consideration of what constitutes suitable, sufficient housing sites, the following approach ought to be adopted:

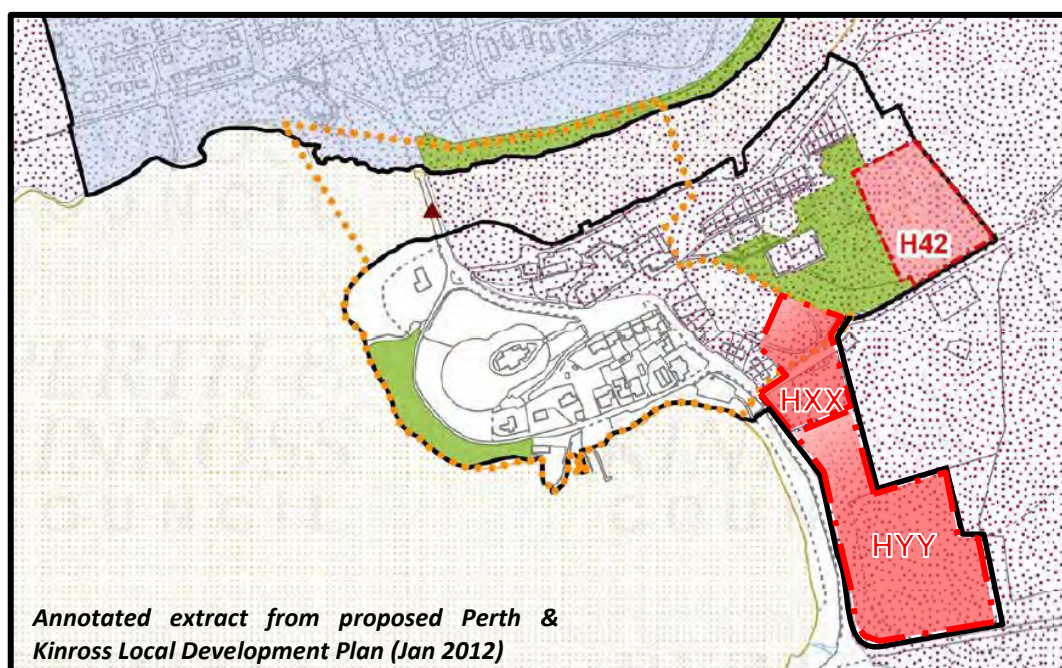
- Identify a range of small to medium housing sites that can be started with minimal need for up front infrastructure investment;
- Ensure that housing sites can contribute to the underlying place-making agenda by demonstrating tangible community benefits associated with their delivery; and
- Seek explicit, demonstrable commitments from developers / landowners that they will bring sites forward for development, in line with the LDP during the plan period.



### iii. Allocating land at Kenmore South for residential and associated development

- 5.10 Recognition has been had of the need to address issue of imbalance within the settlement of Kenmore through allocation of new family housing that includes affordable housing (for rent and sale) as well as mainstream private housing (for permanent occupation).
- 5.11 Additional housing, where this contributes to the Council's place-making agenda, can make a significant positive impact on local communities not just through the ability for existing families to stay in the area and introduction of new families, but also through the delivery of additional facilities and services.
- 5.12 This is all possible through the allocation of land at Kenmore south and the following is offered as a suggested additional allocation within the Local Development Plan.

**Figure 5.2: Proposed adjustment to Settlement Boundary 002**



5.13 The proposed entry within the LDP should then read:

Ref	Location	Size	Number
HYY	Kenmore South	2.0ha	24 houses
<b>Site Specific Developer Requirements:</b> <ul style="list-style-type: none"> <li>• A minimum of 25% affordable housing is provided for on the site.</li> <li>• At least 50% of the site is developed for lower / mid-market family housing for sale (and permanent residence)</li> <li>• A master-plan will be required that confirms the range of enhanced local facilities in the that will be delivered (to include as a minimum visitor parking and relocated public toilets)</li> <li>• Access to and parking for the Sports Ground are included as part of the proposals</li> <li>• Additional visitor facilities (including picnic spaces, retail, public toilets) Ground are included as part of the proposals</li> <li>• Options for enhancement of Kenmore Square are included in the overall scheme.</li> </ul>			

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.