

Your Details

An asterisk (*) indicates a required field.

Your Name: *	<input type="text" value="Iris Ryan"/>
Organisation Name:	<input type="text"/>
Agent Name:	<input type="text"/>
Address 1: *	<input type="text" value="Sheldrake"/>
Address 2	<input type="text" value="Bellwood Park"/>
Address 3	<input type="text" value="PERTH"/>
Postcode: *	<input type="text" value="PH2 7AJ"/>
Phone Number:	<input type="text"/>
Email Address: *	<input type="text" value="REDACTED"/>
Site Name:	<input type="text"/>
Contact Person:	<input checked="" type="checkbox"/> Me <input type="checkbox"/> My Agent

Your comments will be applied to the following items:

5 Perth Area Spatial Strategy - 5.2 Perth - Paragraph 5.2.2

I strongly support the concept of a Green Belt for Perth, and especially the proposed area to the east of the city. Tay Street and the surrounding area are important for tourists, and the Green Belt designation protects the attractive view from here.

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

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 10th 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	Derek Kirk & Donna McBain
Address and Postcode	9 Mill Gardens Powmill FK14 7LQ
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.	H53	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.

Would like to see a reduction in the amount of houses planned and also a maximum limit to the number.

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

The proposal is for 120 units on site reference H53. Our understanding is that new developments are already underway in Powmill at other locations which should reduce this number of units on H53 to under 100. Our concern is that since the figure does not have a maximum upper limit that the actual number of houses could be well in excess of 120. Water pressure is poor at the moment and electricity supplies are interrupted quite frequently, even when the weather is good, and we are not confident that these will be improved to meet the needs of the proposed housing.

In addition the A977 is already a cause for concern as it is a very busy road, particularly when the Forth Road Bridge has restrictions, with a high number of heavy goods vehicles using it. There is no bus service running through the village and as there are no shops in the village cars are very much relied upon to get about (at present probably at least one car per household) even if only to get to the Crook of Devon or Dollar.

In the proposed plan it says that the former Gartwhinzean Hotel and adjacent steading will form the first phase of any development. In light of the hotel being demolished after a fire (when water had to be taking from the Pow Burn by the Fire Brigade to fight the fire) what does this mean?

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

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

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

From: Andy Garry [REDACTED]
Sent: 10 April 2012 15:55
To: TES Development Plan - Generic Email Account
Subject: Proposed Local Development Plan - Representation
Follow Up Flag: Follow up
Flag Status: Green

Dear Brenda Murray,

I am writing in relation to the Proposed Local Development Plan and concerns that I have relating to the proposal for development at Auchterarder Road, Dunning.

Our names and address are:

Mr Andrew Garry, Mrs Claire Garry, Miss Eve Garry & Master Max Garry
12 Latch Burn Wynd
Dunning
PH2 0SP

I wish to raise an objection to the the proposal for residential development of 50 units on a 1.9 hectare site and would like to see a change to this element of the Proposed Plan, for the following reasons:

- * Overall I am very concerned about this large proposed development in such a small village (which is an Outstanding Conservation Area) and which would fall partly outwith the settlement boundary. How would further new development ensure that the village retains its conservation status?
- * An issue with the infrastructure/sewage being at full capacity already - there is 'Limited Capacity' of public drainage in Dunning
- * Any further development in Dunning was to relate to 'small infill developments' not new development. There is presently on such gap site, already in existence, next to The Thorn Tree which could be developed upon (Burnside Garage Dunning)
- * What evidence of demand is there to show that there is a need for a further 50 new homes? There has be a number of new developments around Dunning that there has been an issue with selling units.
- * The site being proposed is agricultural land and not a brown field site - is the land owner in agreement of this proposal, as it is high quality agricultural land?

Ultimately we believe that there are presently a number of gap sites that have been identified for development in the Local Development Plan and there areas should be pursued instead of creating a large scale development, which could alter the conservation status of Dunning.

Yours sincerely
Mr & Mrs Garry



Please Reply 2nd Flr Hartington House, Hartington Rd, Broadheath, Altrincham, Cheshire
To WA14 5LX

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

Contact: Ziyad Thomas
Direct Line: [REDACTED]
E-mail: [REDACTED]
Our Ref: RC/ZT
Your Ref:
Date: 10th April 2012

Dear Sirs,

**McCARTHY & STONE RETIREMENT LIFESTYLES LTD.
RESPONSE TO PERTH LOCAL DEVELOPMENT PLAN – PROPOSED PLAN**

Thank you for the opportunity to comment on the consultation papers for the aforementioned document. As the market leader in the provision of sheltered housing for sale to the elderly, McCarthy and Stone Retirement Lifestyles Ltd considers that with its extensive experience in providing developments of this nature, it is well placed to provide informed comments on the Local Development Plan insofar as it affects or relates to housing for the elderly.

McCarthy and Stone Retirement Lifestyles Ltd provided representations to the Perth Local Housing Strategy in September 2011. In our commentary we detailed the pressing need for specialist accommodation for the elderly within Perth and Kinross arising as a result of the areas ageing demographic profile and how private sheltered accommodation schemes specifically for the elderly, such as those developed by McCarthy and Stone, will have a key role in addressing future housing needs. Furthermore we outlined the multiple benefits that owner occupied private sheltered housing for the elderly provides both to residents and the wider community. For your convenience, and to avoid repetition a copy of this representation has been provided.

My Client would like to commend the Council for positively addressing the accommodation needs of its ageing population thorough *Policy RD6: Particular Needs Housing Accommodation*. This Policy not only highlights the urgent and increasing need for this type of accommodation, but stipulates that the Council will support developments of this nature in appropriate locations.

My Client also broadly supports the Council's approach to Affordable Housing contributions detailed within *Policy RD4: Affordable Housing* and the Supplementary Affordable Housing Guidance Note. We would however like to stress that the overall costs (e.g. build costs, finance and overheads) of providing specialised accommodation for the elderly are often higher than those for standard open market housing. Hence it is always necessary to consider the viability of such schemes on a case by case basis as per the National Planning Policy Guidance detailed within Scottish Planning Policy and the letters sent to the Heads of Planning in Scotland by the Chief Planner Jim MacKinnon (29th October 2010).

In conclusion, I would like to reiterate the growing need for specialist housing for the elderly and the role of the private sector in meeting projected housing need within Perth and Kinross.

Thank you for the opportunity to comment.

Yours faithfully

A large black rectangular box redacting the signature of Ziyad Thomas.

Ziyad Thomas BSc (Hons) MSc MRTPI
Planner



THE PLANNING BUREAU LIMITED



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0121 275 0000

Please Reply To: 2nd Flr, Hartington House, Hartington Rd, Broadheath, Altrincham, Cheshire
WA14 5LX

Norma Robson
Team Leader Planning and Policy
Housing and Community Care
Perth and Kinross Council
5 Whitefriars Crescent
Perth
PH2 0PA

Contact: Rob Cartledge
Direct Line: [REDACTED]
E-mail: [REDACTED]
Our Ref: RC/ZT
Your Ref:
Date: 26th September 2011

Dear Mrs Robson,

McCARTHY & STONE RETIREMENT LIFESTYLES LTD. RESPONSE TO DRAFT PERTH AND KINROSS LOCAL HOUSING STRATEGY 2011-2016

Thank you for the opportunity to comment on the consultation papers for the aforementioned document. As the market leader in the provision of sheltered housing for sale to the elderly, McCarthy and Stone Retirement Lifestyles Ltd considers that with its extensive experience in providing developments of this nature, it is well placed to provide informed comments on the Local Housing Strategy insofar as it affects or relates to housing for the elderly.

My Client is reassured that the Council acknowledges the significant rise in the elderly population within Perth and Kinross by 2033. This raises serious issues with regards to the future provision of adequate support and accommodation for elderly persons within the area. We therefore commend the Council's willingness to positively address this issue within the Perth and Kinross Local Housing Strategy.

We do feel however that the focus of the Draft LHS on the provision of care for the elderly and the provision of 'Lifetime Homes' overlooks the benefits of specialist private sector accommodation for the elderly. We would like to remind Perth and Kinross Council of the growing need for specialist housing for the elderly, the role of the private sector in meeting projected housing need and the benefits that this type of housing provides, not only to residents but to the wider community as well.

National Government Guidance

It is clear that there is an increasing level of concern within the Scottish Government over the ability to provide a suitable level of housing and care for Scotland's increasingly elderly population. The provision of suitable housing for the elderly has been raised in several recent Scottish Government Guidance documents including;

- Wider Planning for an Ageing Population Working Group (March 2010)
- Housing: Fresh Thinking, New Ideas (May 2010)
- The Impact of Ageing on Housing in Scotland (July 2010)
- Homes Fit for the 21st Century (February 2011)

The Scottish Government has published a Draft National Strategy for Older People which it expects to finalise in December 2011. One of the key aims cited by the Scottish Government within the Draft Strategy is that *"By 2021, we will have increased the proportion of new housing built that is suitable for and attractive to older people"*. To achieve this, the Scottish Government says it will promote and encourage new housing models across all tenures, including owner occupied retirement housing. McCarthy and Stone remain committed to working with the Scottish Government to achieve this.

Finally, Scottish Planning Policy states *"Development Plans should address the housing needs of all sections of the community"*. The specific example given is *"gypsies and travellers and travelling showpeople"*. McCarthy and Stone understand and recognise the importance of that sector of the community, but would suggest that there are other sectors of the community which equally require recognition in development plans, such as the older population, not least given their significance in numerical terms.

Regional Guidance

The Registrar General's most recent population projections for Scotland were published in February 2010. The population of pensionable age is projected to increase in all Council areas by 2033 with Perth and Kinross expected to see a relative increase of 39% (based on 2008 population levels), which is higher than the average for Scotland (31%) over this period.

The Perth and Kinross Local Housing Strategy acknowledges the areas ageing population and the increasing demand for specialist housing for the elderly by stating:

"Perth and Kinross has above national levels of its total population in the 65 and 75years and above age groups. In addition the rate of population increase in the numbers in these groups will exceed the national average. There will be an increasing and substantial demand for housing across all tenures which is built specifically, or can be adapted, to suit the needs of people with particular needs (e.g. very sheltered housing / housing with care) and related housing and home support services".

In light of the above, we strongly believe that the Perth and Kinross Local Housing Strategy should make specific reference to the need to encourage the development of specialist accommodation for the elderly in order meet the existing and projected need in the area. Private sheltered accommodation schemes specifically for the elderly, such as those developed by McCarthy and Stone, have a key role in addressing the District's future housing needs.

The remainder of the letter below provides an overview on the benefits of private sheltered housing for the elderly:

Benefits of Private Sheltered Accommodation for Elderly Individuals

Private specialised accommodation for the elderly is a proven housing choice for elderly people who wish to move into accommodation that provides comfort, security and the ability to manage independently to a greater extent. It enables older people to remain living independently within the community and out of institutions, whilst enjoying peace of mind and receiving the support that they need.

All McCarthy & Stone developments are specifically designed to provide housing accommodation for likeminded elderly people, who have experienced specific life changing circumstances that prompt the move into a specialised, purpose built, living environment. The communal facilities and specific features within the apartments designed to meet the particular needs of these likeminded people, generally result in a much improved quality of life. It should be remembered that the typical

occupant of my Client's developments is a 78 year old widowed lady who comes increasingly to need as much as demand the accommodation provided.

The peace of mind and contentment that this form of housing brings to its residents should not be underestimated. The people who choose to make the move into private sheltered housing do so for very specific reasons, because they have particular housing needs at a specific juncture in their lives. This frequently coincides with a life changing event, such as the death of a spouse or experiencing being a victim of crime. The maintenance of an organised, stress-free lifestyle that will benefit the general health and well-being of a like-minded group of people within a contained, communal living environment is of paramount importance to the success of this form of housing, and a desirable end-result for society at large.

Additionally McCarthy and Stone also provide (Assisted Living) Extra Care Housing aimed at enabling independent living for the "frail elderly", persons typically 80 and over. The provision of suitable accommodation for the frail elderly is of critical importance to Perth and Kinross area, and, for Scotland on the whole.

The Extra Care concept provides day to day care in the form of assistance and domiciliary care tailored to owners' individual needs, enabling the frail elderly to buy in care packages to suit their needs as they change. It provides further choice for the frail elderly allowing them to stay in their own home and maintain a better sense of independence, enhancing their personal welfare over time rather than through the fixed costs of a nursing or residential care with its one for all approach. Accordingly, Extra Care housing possesses a number of 'enhanced facilities' in terms of the communal facilities available and provides a higher level of care when compared to private retirement housing. It is therefore a different form of specialised housing for the elderly than retirement housing and provides the increasingly elderly population with more choice and with an alternative type of accommodation to meet their needs as frailty increases.

Community Benefits of Private Sheltered Accommodation

"Housing Markets and Independence in Old Age - Expanding the Opportunities", a new report by Professor Michael Ball of the University of Reading, was presented at a House Commons launch event in May 2011. This report highlights how owner-occupied retirement housing (OORH), such as that built by McCarthy & Stone Retirement Lifestyles Ltd, helps to address the challenges of housing an aging population. A copy of this report has been provided for your convenience.

Professor Michael Ball highlights how OORH provides numerous benefits to communities including increasing the availability of much needed family houses in areas of shortage. This is because most OORH residents will have freed up family homes they were previously under-occupying, the majority of which are located in the market area local to the Retirement housing development. It is therefore clear that private specialised housing for the elderly has a key role to play in providing a suitable and sustainable housing mix that meets the wider housing needs of Perth and Kinross.

Furthermore, the presence of specialised housing for the elderly often greatly enhances the sustainability of businesses in nearby town and local centres. A report compiled by 'The Opinion Research Business' (ORB) entitled *A Better Life: Private Sheltered Housing and Independent Living for Older People* shows how Retirement Living accommodation helps to underpin local shops services and facilities. The report found that 62% of residents in retirement living schemes preferred to shop locally, with 45% of resident shopping within one mile of their scheme.

Conclusion

The provision of owner occupied retirement living housing for the elderly will widen the housing choices for older persons within Perth and Kinross. It allows the local elderly to move into accommodation that enables them to remain living independently within the community and out of institutions and therefore continue to contribute to the community, whilst enjoying peace of mind and receiving the support that they need.

In light of the multiple benefits that owner occupied private sheltered housing for the elderly provides, both to residents and the wider community, and the increasing 'need' for this type of specialist accommodation for the elderly within Perth and Kinross, it is suggested that a policy be introduced that positively supports the delivery of specialised accommodation for older people including sheltered housing. Appropriate wording might be:

"Development proposals for accommodation designed specifically for the elderly will be encouraged provided that they are accessible by public transport or a reasonable walking distance to community facilities such as shops, medical services, places of worship and public open space."

Furthermore an additional method of encouraging the provision of specialist housing for the elderly could be in the form of a development incentive. The recent Professor Michael Ball report suggests that private sheltered housing for the elderly could be given an enhanced planning status, similar to affordable housing, to encourage sufficient levels of delivery from the private sector to meet existing and future demand stating that:

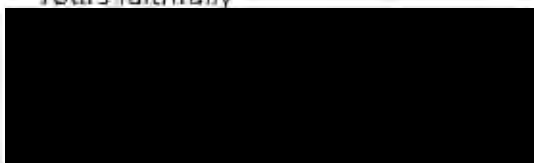
*'to improve the supply and lower the price of owner occupied retirement housing (OORH), this type of housing should be redefined as the equivalent of affordable housing in terms of negotiations with builders over development charges. Treating all OORH as a form of affordable housing in planning terms, because of its significant personal and community benefits, would help reduce prices and increase availability. However, to impose price or quality caps on part or all of it would damage supply. **Rather this proposal suggests that all OORH new build should be given enhanced planning status alongside low-cost home ownership for younger households, which is already treated as a form of affordable housing**'.* (emphasis added) (page 6. Executive Summary)

While this is acknowledged to be a planning issue, planning policies should be derived from housing priorities and subsequently it is important to recognise the importance of OORH in the LHS.

In summary, I stress the need to positively acknowledge the role that owner-occupied sheltered housing schemes play in meeting older person housing needs and in providing housing choice within the Perth and Kinross Local Housing Strategy.

Thank you for the opportunity to comment.

Yours faithfully



Rob Cartledge BA (Hons) MRTPI
Deputy Managing Director

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	Victoria Allen
Address and Postcode	Ecotricity, Unicorn House, Russell Street, Stroud Gloucestershire GL5 3AX
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: Renewable and Low Carbon Energy Generation	or			
Site ref.		or			
Chapter	3.10 Environmental Resources	Page no.		Paragraph no.	3.10.1

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.

Revision of Policy ER1.

The Policy is not precise enough and does not give clarity to the industry as to where this form of development would be acceptable. We would also like to see criteria c and criteria h of the policy removed.

Please see below.

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

We do not think that the policy is consistent with Scottish Government Planning Policy in respect of onshore wind. It is not precise enough and does not give clarity to the industry about where this form of development would be acceptable.

c. The connection to the electricity distribution or transmission system.

Factor C requires the consideration of the connection to the electricity distribution system or transmission system. This is contrary to Scottish Planning Policy (Feb 2010) para 191 which states that "Existing and approved grid capacity should be maximised wherever possible. However, grid constraints should not be used as a development constraint where renewable energy potential exists."

As such it is considered that this section should be removed from the policy.

h. The reasons why the favoured choice over alternative sites has been selected

The EIA Regulations Scotland 1999 (Schedule 4, part 2) state that details of the main alternatives studied by the applicant or appellant and an indication of the main reasons for his choice, taking into account the environmental effects. The Regulations do not require an applicant to consider alternatives. What they require is that, if alternatives were considered, the main alternatives are outlined. Furthermore it is recognised that technical and economic criteria will have to be given weight.

Planning Advice Note 58 on EIA, address alternatives at paragraph 69 and 71 which states that "the planning authority should determine the planning application on the merits of the proposal before them and not on the merits of potential alternatives (for some projects however the existence or otherwise of a feasible alternative may be a material consideration in the determination of the application)". It is important to state that in this context Renewable energy development is different from most other forms of EIA development, in that multiple sites will be coming forward and the policy framework anticipates that. The widespread need for wind farms arises on a national (and international) basis and it would be illogical to suggest that one proposal is an alternative for another. Furthermore, as wind farms can only be established where the resource is available, and other constraints can be met, the approach must be to allow development given the overall policy imperative. Consequently we consider that this section of the policy should be deleted.

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

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

Save a copy

Print

Submit

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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	Alexander Harley Seeds Ltd
Address and Postcode	Blairfield, Milnathort, KY13 0SG
Telephone no.	<div style="background-color: black; width: 100px; height: 1.2em;"></div>
Email address	<div style="background-color: black; width: 150px; height: 1.2em;"></div>

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 checked="" type="checkbox"/>	SEA ER Addendum 2 - Appendices	<input type="checkbox"/>

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

Some of our comments are relevant to future Supplementary Guidance on renewable energy.

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

Policy ref.	ED3, ER1, ER6,	or
Site ref.		or
Chapter		Page no. <input type="text"/> Paragraph no. <input type="text"/>

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

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

Please refer to the letter enclosed with this form


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

Please refer to the letter enclosed with this form

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

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

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

**ALEXANDER HARLEY SEEDS LTD**Thomanean, Milnathort
Kinross KY13 0RF
ScotlandAlexander Harley Seeds Ltd
Blairfield
Milnathort
Kinross
KY13 0SG

10 April 2012

Local Development Plan Team
The Environment Service
Perth & Kinross Council
Pullar House
35 Kinnoull Street
Perth
PH1 5GD
By email to DevelopmentPlan@pkc.gov.uk

Consultation Response: Perth & Kinross Proposed Local Development Plan, January 2012

Alexander Harley Seeds Ltd (AHSL) and its sister company Kirkforthar Potato Company Ltd (KPCL) hereby submits a representation for the Perth and Kinross Proposed Local Development Plan, January 2012. The relevant representation form is enclosed with this letter.

Both AHSL and KPCL are part of the Cygnet Group (the Group), which is a long-established family owned agribusiness based in Scotland. The Group currently operates the UK's largest potato breeding programme, with a turnover of £16 million. It has 7% of the market share of the total UK market. 1% of the total European market and supports 50 Scottish growers. Potato seeds are recognised by the Scottish Government as an important export product which will help achieve a sustainable future for Scottish agriculture.

Our Experience: Kirkforthar Potato Company Ltd Wind Turbine Planning Application

The most recent experience the Group has had with the current Local Plan has been through an application we submitted on behalf of KPCL in August 2010 for a single wind turbine on land at Blairfield, Milnathort. As we are a local business that has attempted to achieve planning permission under the current local plan, our experiences with the application will be discussed first to provide the context for our response on the proposed Local Development Plan.

The main office of the Cygnet Group is located at Blairfield, which offers access to over 10,000 tonnes of state of the art refrigerated storage and a sophisticated grading facility. The production, quality control, transport, sales and marketing, and administration support functions are all based at this site. In combination, these activities require large volumes of energy, particularly for powering the refrigerators in the cold storage facility. We sought to increase the sustainability of the business and become more electrically self-sufficient by applying for a single 330kW wind turbine near the site. The generation from the turbine would have been sufficient to meet 100% of on-site requirements.

From the earliest stage of the planning process, when the application was screened by the Planning Authority against the EIA Regulations, we outlined the business case and made it clear that the wind turbine was meant for on-site electrical supply. The Perth and Kinross Council Local Plan and Structure Plan lends clear policy support for renewable energy proposals that service the needs of businesses, defining them as “community” scale projects. This approach is also supported by current Scottish Planning Policy. Community level schemes are meant to be considered more favourably than others that are intended strictly for export to the National Grid, and circumstances may be encountered where the environmental effects of the proposal should be counterbalanced by the socioeconomic benefits of the proposal.

The Council’s Economic Development Team was approached by our agent during the application’s determination to provide a consultation response. The Team was interested to hear about our proposal and informed that they had provided their support to the case officer. However, it was not until the decision notice was issued that we learned their consultation was not provided in writing. The application was refused at the delegated level – upon reading the report of handling it was clear that the Council Economic Team’s support had not been considered by the appointed officer, so the economic benefits of the proposal had been overlooked.

Subsequent to the planning refusal we lodged an appeal with the Local Review Body, specifically citing the absence of the Economic Team’s consultation as an exceptional circumstance which meant that the original application’s merits had not been properly considered. The Economic Team was able to contribute to the appeal with a written consultation response, which again provided clear support for our application. However, when this consultation was forwarded to the Development Quality Manager, they again refrained from providing any advice on the counterbalance of the economic benefits and the environmental effects, and therefore the acceptability of the project in planning terms. This judgement was fundamental to the determination of our application. It seems clear to us that the planning authority is reticent to consider the economic benefits of renewable energy proposals where these benefits may counterbalance environmental effects. This is not acceptable when there is a clear policy framework for this very situation – all policy tests should be carried out.

The Proposed Local Development Plan

From a planning policy point of view, we note that section 3E (2) of the Planning etc. (Scotland) Act 2006 requires planning authorities to prepare their plans ‘*with the objective of contributing to sustainable development*’, and that the definition of sustainable development relevant to this section of the act is set out in paragraph 35 of the Scottish Planning Policy. It is also the case that under Section 16(2)(a) of this act that a local authority must take into account the National Planning Framework when preparing their local development plans.

Economic Development – Introductory Text and Policies ED1 to ED5

The definition of sustainable development set out in paragraph 35 of the SPP mentions the need to use ‘*sound science responsibly*’. Within the Introductory text to the Economic Development section on page 25 of the proposed plan, and Policies ED1 to ED5, disappointingly there is no mention of the role of high-tech businesses or high-tech industry can play in growing the economy of Perth and Kinross. There is a statutory requirement for the local development plan to seek to advance ‘sound science’ and this should be more clearly expressed. We note that an allocation of land for the James Hutton Institute at Invergowrie for food/agricultural research is mentioned on page 67 of the plan. It is important that opportunities for research elsewhere in the local plan area are supported by policies and it is not currently clear that they are.

Policy ED3: Rural Business and Diversification

The Renewables Opportunity

This policy, and the supporting text surrounding it, does not contain any reference to renewable energy development. This is a clear backwards step from the current local plan. Renewable energy development is the economic opportunity of a generation for rural Scotland. Locally owned small to medium scale developments (for example, 100kW run-of-river-hydro schemes or wind energy developments of up to two 100m tip-height machines) can be developed by local agribusinesses and landowners. By contrast, larger renewable energy developments are often owned and developed by large utility companies.

Existing and potential rural businesses could be strengthened significantly by diversifying into renewable energy, as we argued in our own application. Maintaining the local economy is one of the central duties of any local authority. The vision statement given on page 17 of the Proposed Plan (2012) refers both to limiting environmental impacts and ensuring economic competitiveness. The statement refers to making the area more ‘sustainable’, and ‘competitive’, doing this ‘without creating an unacceptable burden on our planet’, and creating an area ‘where businesses choose to invest and create jobs’. Few other development types could achieve these goals more effectively during the lifetime of the plan than locally-owned renewable energy projects.

The Government’s Feed in Tariff, Renewables Obligation, and Renewable Heat Incentive schemes present financial incentives but these mechanisms cannot operate in isolation. The planning system must also encourage deployment of renewable energy and policy ED3 should communicate a clear understanding that these developments are very important for the rural economy.

Rural Diversification and the 2020 Routemap

The document ‘2020 Routemap for Renewable Energy in Scotland’ was published by the Scottish Government in July 2011. It includes a ‘new target of 500 MW community and locally-owned renewable energy’ (p4), and notes ‘Over the next decade to 2020, renewables in Scotland could provide: ... a transformational opportunity for local ownership and benefits.’ (p9). The document is very clear on the economic importance of locally owned renewables and the importance placed on this by Ministers:

‘Scottish Ministers are determined to see the benefits from our indigenous energy resources flow through to the people of Scotland. In particular there is an opportunity for a transformation in the level of local ownership of energy.’ (p11)

Therefore, we find it very disappointing that these aspirations are not shared by the proposed LDP. The Routemap is not published specifically as a planning document but gives relevant background to the Scottish Government’s approach to renewables and how this has been clarified since the SPP (February 2010), and the Climate Change Act 2009. The Routemap recognises that although renewable energy deployment has been relatively successful in recent years, the rate of deployment will need to increase if the 2020 key target of 100% of electricity generated by renewables is to be met:

‘The successful delivery of the capacity required to deliver the equivalent of 100% of Scottish electricity consumption will demand a significant and sustained improvement over the deployment levels seen historically.’ – p6

Rural Diversification and Sustainable Development

The definition of sustainable development set out in paragraph 35 of the SPP mentions 5 points. Two of these are particularly relevant here:

- *“living within environmental limits ...*
- *achieving a sustainable economy ...”*

Locally owned renewable energy development clearly contributes to these objectives. Perth & Kinross Council has a statutory duty to advance these goals in their Local Development Plan and the role that locally owned renewables can play in this ought to be reflected in policy ED3.

Policy ER1: Renewable and Low Carbon Energy Generation

Policy ER1A: New proposals

The phrase *‘where they are well related to the resources that are needed for their operation’*, needs clarification. It is widely understood that Scotland has fantastic renewable energy potential. The viability of a wind turbine site, for example, is often quite clear to a developer. The power output of wind turbines on similar sites to a proposed development can be seen online. This policy sets a slightly negative tone by questioning this resource and asking that applicants justify whether the resource is available. Also, the viability of a particular development is not a planning concern. It is a private business matter whether the resources are available to allow the development to operate in a way that makes the project viable.

Criterion (c): The connection to the electricity distribution or transmission system is usually dealt with by the district network operator under a separate application process. There is unlikely to be certainty as to the form of the connection at the time the planning application for the generating facility is submitted. An indication of the likely connection route could be given in supporting information but the requirement for this could be relegated to commentary within Supplementary Guidance, rather than featuring within this policy’s criteria.

Criterion (h) introduces a sequential test that is at odds with National Policy within the SPP and almost impossible for applicants to meet. With reference to spatial strategies for wind turbines the SPP states on page 39 *‘Spatial frameworks should not be used to put in place a sequential approach to determining applications’*. Reporters often disregard sequential tests in policies for renewable energy development at appeal and determining appeals without further reference to these policies.

Policy ER6: Managing Future Landscape Change to Conserve and Enhance the Diversity and Quality of the Area’s Landscapes

Development of any kind will introduce change into a landscape. As it stands, Policy ER6 places too much emphasis on an aversion to change. The SPP states in paragraph 127 – *‘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’*. For example, Criterion (d) could be amended from *‘they safeguard the relative wildness of the area’s landscapes’*, to *‘any change to the area’s relatively wild landscapes should be of an acceptable magnitude given the type of development proposed’*, such a criteria would help to place landscape effects in context with the overall benefits of a proposal. Through our own experience we have noticed that the local authority appears to be inclined to apply their landscape policies in isolation without

reference to wider planning considerations. This can lead to renewable energy being treated as no more than a landscape problem without recognition being given for the substantial environmental and economic benefits of such development. This is not a fair or balanced consideration of the benefits of these proposals and it is crucial this mindset is changed.

Many members of the public will regard the appearance of renewable energy developments within the landscape as a welcome sign that as a society we are seeking to live within the carrying capacity of our environment. Ultimately, finite energy resources cannot be relied on indefinitely. Renewable energy developments will need to be built and will be visible within the landscape.

Supplementary Guidance (yet to be prepared)

Page 311 contains a list of guidance to be produced later. Among these is one for '*Renewable and Low Carbon Energy Generation, Climate Change, Carbon Reduction and Sustainable Construction*'. The comments above will be relevant to the preparation of this Supplementary Guidance.

Summary

We are concerned that certain policies in the proposed LDP constitute a backwards step from the Council's position in the current Local Plan. The proposed LDP does not reflect key aspirations set out in current Scottish Planning Policy and the National Planning Framework. Great opportunities exist for locally owned renewable energy schemes and the proposed LDP does not lend sufficient support to ensure that these opportunities can be realised.

From the experience gained with our own application, we found that Perth and Kinross Council is failing to properly consider the economic benefits of renewable energy technologies to local businesses. The Council must properly integrate its internal economic and planning decision-making processes. The Planning and Regeneration departments of the Planning and Regeneration Department should work together more efficiently to properly consider the counterbalance of economic and environmental considerations. It is all well and good adopting policies that encourage businesses to generate their own renewable power, however without the follow-through from the Planning Authority to consider the consultations from their very own departments, real and deliverable opportunities to encourage economic growth and safeguard rural employment will continue to be missed.

I trust that the above comments will be given due consideration when the final version of the Local Development Plan is being prepared. Alexander Harley Seeds would like to thank you for the opportunity to respond to this consultation.

Doug Harley
Alexander Harley Seeds



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

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 10th 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	Jack Cook
Address and Postcode	The Greenspan Agency, 151 West George Street, Glasgow
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 checked="" type="checkbox"/>	SEA ER Addendum 2 - Appendices	<input type="checkbox"/>

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

Some representations will be relevant to guidance on renewables yet to be prepared

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

Policy ref.	ER1A, 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.

Please refer to letter enclosed with this form

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

Please refer to letter enclosed with this form

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

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

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

The Greenspan Agency
151 West George St
Glasgow
G2 2JJ

Document Ref: Reps/P&K/JC/L011
10 April 2012

Local Development Plan Team
The Environment Service
Perth & Kinross Council
Pullar House
35 Kinnoull Street
Perth
PH1 5GD
By email to DevelopmentPlan@pkc.gov.uk

To Whom It May Concern

Consultation Response: Perth & Kinross Proposed Local Development Plan, January 2012

I write further to the publication of the above documents to provide a response on behalf of The Greenspan Agency.

The relevant representation form is enclosed with this letter.

The Greenspan Agency are renewable energy developers and consultants with projects in Perth & Kinross.

We welcome the preparation of your Proposed Local Development Plan (LDP) and the opportunity to respond. We are supportive of the Council's attempts to deliver an up-to-date planning policy framework to guide development. We also welcome the decision to produce a single plan to cover the whole local authority area; this will be more readily accessible for developers than a patchwork of separate plans.

We note that section 3E (2) of the Planning etc. (Scotland) Act 2006 requires planning authorities to prepare their plans '*with the objective of contributing to sustainable development*', and that the definition of sustainable development relevant to this section of the act is set out in paragraph 35 of the SPP.

Edinburgh office
The Greenspan Agency
20 Forth Street, Edinburgh, EH1 3LH
[Redacted]
[Redacted]
[Redacted]

Aberdeen office
Greenspan Contractors
Methlick, Ellon, Aberdeenshire, AB41 7BY
[Redacted]

Glasgow office
The Greenspan Agency
151 West George St, Glasgow, G2 2JJ
[Redacted]

Policy ER1: Renewable and Low Carbon Energy GenerationPolicy ER1A: New proposals

The phrase *‘where they are well related to the resources that are needed for their operation’*, needs clarification. It is widely understood that Scotland has fantastic renewable energy potential. The viability of a wind turbine site, for example, is often quite clear to a developer. The power output of wind turbines on similar sites to a proposed development can be seen online. This policy sets a slightly negative tone by questioning this resource and asking that applicants justify whether the resource is available. Also, the viability of a particular development is not a planning concern. It is a private business matter whether the resources are available to allow the development to operate in a way that makes the project viable.

Criterion (c): The connection to the electricity distribution or transmission system is usually dealt with by the district network operator under a separate application process. There is unlikely to be certainty as to the form of the connection at the time the planning application for the generating facility is submitted. An indication of the likely connection route could be given in supporting information submitted with the application but the requirement for this could be relegated to commentary within Supplementary Guidance, rather than featuring within this policy’s criteria.

Criterion (h) introduces a sequential test that is at odds with National Policy within the SPP and almost impossible for applicants to meet. With reference to spatial strategies for wind turbines the SPP states on page 39 *‘Spatial frameworks should not be used to put in place a sequential approach to determining applications’*. The Greenspan Agency are aware of Reporters disregarding sequential tests in policies for renewable energy development at appeal and determining appeals without further reference to these policies.

Criterion (f) refers to *‘The effects on carbon rich soils’*. The inclusion of this criterion gives too much focus to an issue that is largely misunderstood. Scottish peatlands are an important store of CO₂ but renewable energy developments are not the threat to this store that some anti-renewables groups have suggested. The carbon-payback period of a renewable energy development is unlikely to be significantly affected by the carbon emissions caused by construction on peat. A recent Greenspan Agency project elsewhere in Scotland was approved on a peat bog. The Environmental Statement we prepared to accompany the planning application presented detailed calculations demonstrating that carbon-payback was extended by approximately 2 months when emissions from peat were taken into account. Over the 25 year lifespan of a wind energy development the overall carbon saving compared with conventional fossil fuel generation is overwhelmingly favourable. The highlighting of the peat issue within criterion (f) is disappointing and provides too much emphasis on a matter which may alarm the public and mislead decision makers without good grounds. Peat could be referred to in Supplementary Guidance as a matter for possible consideration but should not be given this level of emphasis.

Sustainable Development

The definition of sustainable development set out in paragraph 35 of the SPP mentions 5 points. Two of these are particularly relevant here:

- *“living within environmental limits ...*
- *achieving a sustainable economy ...”*

Renewable energy development clearly contributes to these objectives. Perth & Kinross Council has a statutory duty to advance these goals in their Local Development Plan and the role that renewables can play in this ought to be more clearly and positively emphasised within Policy ER1A and throughout the Local Development Plan. Sustainable development is not possible without renewable energy.

The 2020 Routemap

The document ‘*2020 Routemap for Renewable Energy in Scotland*’ was published by the Scottish Government in July 2011.

The Routemap is not published specifically as a planning document but gives relevant background to the Scottish Government’s approach to renewables and how this has been clarified since the SPP (February 2010), and the Climate Change Act 2009. The Routemap recognises that although renewable energy deployment has been relatively successful in recent years, the rate of deployment will need to increase if the 2020 key target of 100% of electricity generated by renewables is to be met:

‘The successful delivery of the capacity required to deliver the equivalent of 100% of Scottish electricity consumption will demand a significant and sustained improvement over the deployment levels seen historically.’ – p6

The need for faster deployment of renewable energy should be reflected in the tone of Policy ER1A and throughout the Local Development Plan.

Policy ER6: Managing Future Landscape Change to Conserve and Enhance the Diversity and Quality of the Area’s Landscapes

The Greenspan Agency always consider landscape effects from the earliest stages of site selection and design. The landscapes of Perth & Kinross are among its greatest assets and should be protected from any inappropriate development. However, any development will introduce change into a landscape. As it stands, Policy ER6 places too much emphasis on an aversion to change. The SPP states in paragraph 127 – *‘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’*. For example, Criterion (d) could be amended from *‘they safeguard the relative wildness of the area’s landscapes’*, to *‘any change to the area’s relatively wild landscapes should be of an acceptable magnitude given the type of development proposed’*, such a criteria would help to place landscape effects in context with the overall benefits of a proposal. The Greenspan Agency have noticed that

some local authorities are inclined to apply their landscape policies in isolation without reference to wider planning considerations. This can lead to renewable energy being treated as no more than a landscape problem without recognition being given for the substantial environmental and economic benefits of such development.

Many members of the public will regard the appearance of renewable energy developments within the landscape as a welcome sign that as a society we are seeking to live within the carrying capacity of our environment. Ultimately, finite energy resources cannot be relied on indefinitely. Renewable energy developments will need to be built and will be visible within the landscape.

Supplementary Guidance Yet to be Prepared

Page 311 contains a list of guidance to be produced later. Among these is one for '*Renewable and Low Carbon Energy Generation, Climate Change, Carbon Reduction and Sustainable Construction*'. The comments above will be relevant to the preparation of this Supplementary Guidance.

I trust that the above comments will be given due consideration when the final version of the Local Development Plan is being prepared. The Greenspan Agency would like to thank you for your willingness to engage developers in planning policy preparation.

Yours Sincerely,

Jack Cook, MRTPI
Environmental Planner
The Greenspan Agency

[Redacted signature block]

Enc.

From: Charles Dundas [REDACTED]
Sent: 10 April 2012 14:29
To: TES Development Plan - Generic Email Account
Subject: Local Development Plan - Consultation
Follow Up Flag: Follow up
Flag Status: Green
Attachments: P&KC-LDP-RepresentationForm.pdf

Please find attached a submission on behalf of Forth Wines, Milnathort in response to the consultation on the Local Development Plan.

Thank you,

Charles Dundas
Public Affairs Adviser

Invicta Public Affairs Ltd,
5 Coates Crescent, Edinburgh, EH3 7AL.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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Registered Office: 5 Coates Crescent, EDINBURGH, EH3 7AL: Registered in Scotland No. 327 313

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	Ewen Cameron
Address and Postcode	Forth Wines, Crawford Place, Milnathort, KY13 9XF
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.	Op16 and E19	or			
Chapter	7 - Kinross-shire Area	Page no.	204 & 208	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.

We would like to see Op16 extended further into E19 to better align with land ownership boundaries. This would allow both sites to bring forward full development proposals without the delays and legal wrangling which can be associated with projects involving multiple owners.

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

Forth Wines are the owners of a site divided by this LDP between both Op16 and E19. As a long established local business, we are keen to upgrade our warehouse facilities in the area, since our Crawford Place buildings are no longer fit for purpose.

The only way to do this is by realising the capital in our current site through development and moving to a new location in the same area. Not only are the buildings now unsuitable, but Forth Wines are also now based in an unsuitable area for our business, and would be better located further South by Kinross. We have discussed with all our local councillors, MP and MSP our ambitions and they have been very supportive of our plans.

From discussions with the Council planning officials we understand that the Council's thinking is that since E19 will be zoned for employment and Op16 for mainly housing, then a "corridor" of housing intruding from one into the other could create an incompatibility between the two uses. However, we have been working with a developer on a wider 'masterplan' for the whole area, which shows clearly how best use can be made of both sites, side by side.

Of course, if Forth Wines were not able to develop our current site fully, as a result of this LDP then it is unlikely that we would be able to afford to relocate within the Perth and Kinross area, and a local business and the associated jobs would be lost to the area.

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

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

Save a copy

Print

Submit

From: Will [REDACTED]
Sent: 10 April 2012 22:48
To: TES Development Plan - Generic Email Account
Subject: proposed housing at lathro farm and west kinross
Follow Up Flag: Follow up
Flag Status: Green

11 Gallowhill Road,
Kinross.
KY13 8RT

I object to the above possible plan to access housing via Gallowhill Road, Kinross.
Entering Gallowhill Road from the muirs side, the road is extremely narrow, and with residents parking is often restricted to one lane, there is also a blind corner which makes it dangerous for cars and pedestrians including children going to and from the nearby school.

My concerns are this road would not cope with an increased traffic flow.

Further along this road narrows considerably, with no pavement on either side, barely wide enough to allow cars to pass each other safely.

The road is used daily by walkers, cyclists the elderly, because it's a reasonably quiet country road.

Gallowhill Road is not suitable for access to any housing developments.

yours faithfully,

william walls

From: Kathleen Flood [REDACTED]
Sent: 10 April 2012 21:00
To: TES Development Plan - Generic Email Account
Subject: Greenbelt proposal
Follow Up Flag: Follow up
Flag Status: Green

PROPOSED GREENBELT PLAN.

Dear Sirs, with reference to the above, surely a robust Planning / Development department should be able to judge each application for planning and building permission to be treated on their individual merits. The Kinnoull Woodland Park should obviously be an exclusion zone as far as building is concerned. Surely sensitive building on privately owned land on the lower slopes, already heavily populated, cannot be designated as contrary to greenbelt thinking when the area at St.Mary's is so small a portion of the whole area.

I ask that the proposal to assume the St.Mary's field into a greenbelt be recognised as quite unnecessary and against common sense.

Kathleen Flood, 74 Fairies Road, Perth.

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

Name	DONALD YELLOWLEY (on BEHALF OF ANDREW SINCLAIR)
Address and Postcode	DMH BARR LUMSDEN THE MILL BRIDGE OF ALLAN. FK9 4JS
Telephone no.	[REDACTED]
Email address	[REDACTED]

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

2. Which document are you making a representation on?

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

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

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

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

I WOULD LIKE TO SEE AN ADDITIONAL AREA OF LAND INCLUDED WITHIN THE DRON VILLAGE AREA, AS SUITABLE FOR HOUSING DEVELOPMENT.

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

ADDITIONAL HOUSING WOULD ADD TO THE VILLAGE AND HELP TO CREATE A COMMUNITY. THE PROPOSED AREA APPEARS TO BE A NATURAL EXTENSION OF THE EXISTING HOUSING WITHIN THE VILLAGE.

I ATTACH A PLAN SHOWING THE AREA WE WOULD LIKE TO PROPOSE FOR INCLUSION IN THE PLAN.

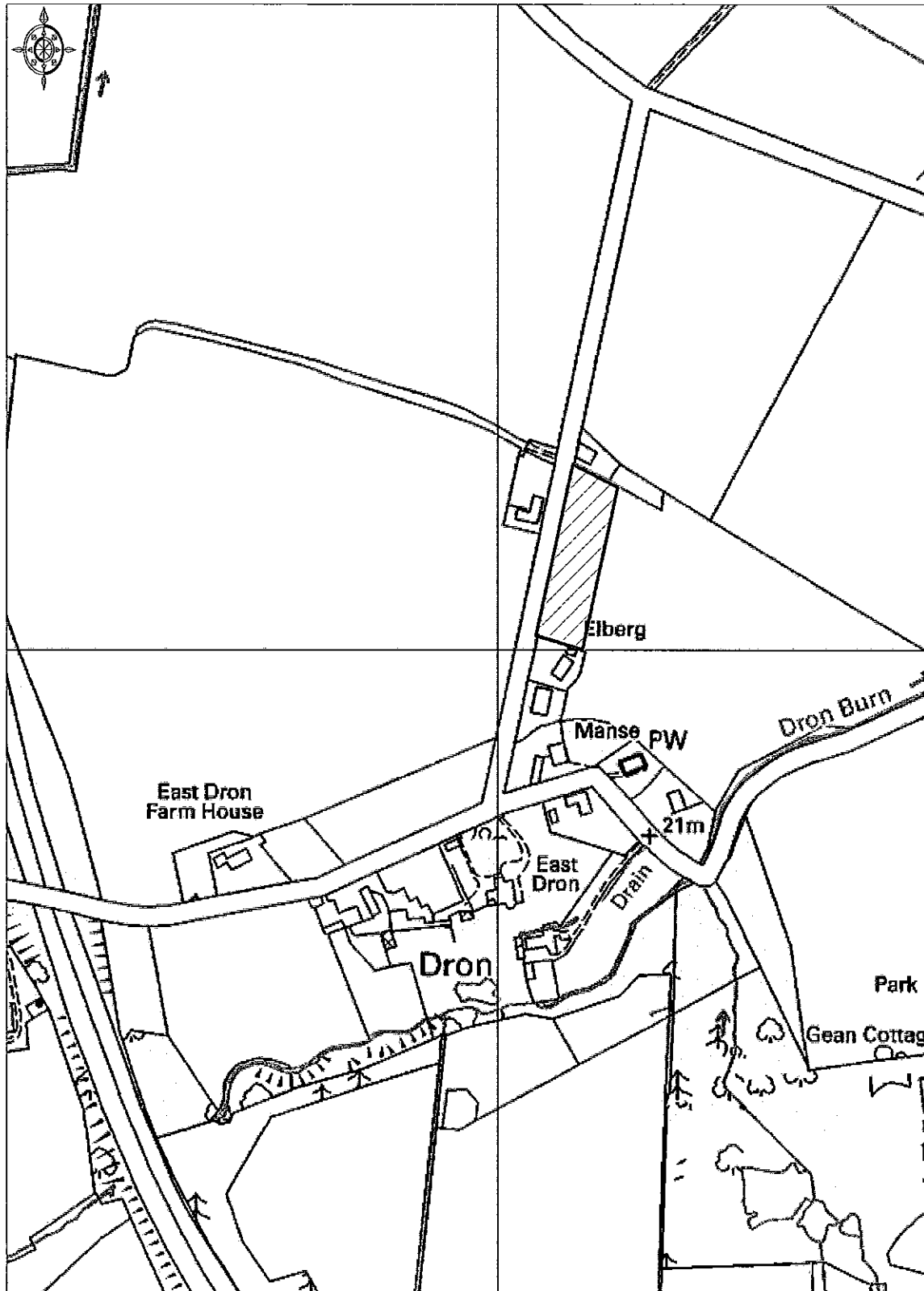
The Submit button will open an email addressed to the LDP team and attach this form, at this point you will have the opportunity to add text to the email and attach any supporting information.

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

Save a copy

Print

Submit



From: heather duncan [REDACTED]
Sent: 10 April 2012 17:10
To: TES Development Plan - Generic Email Account
Subject: Objection to H27 building in Luncarty
Follow Up Flag: Follow up
Flag Status: Green

Sorry im an hour late in getting a representation to you, i had filled out form online but forgot to end it.

My objection is to the building of houses and development of employment land in Luncarty – REF H27.

I live at 5 Tayview, close to where houses will be built, i bought my house mainly because of location and the view that nothing would be build close by, i have children and the school is great the size it is, classes are small and each child gets the attention they deserve, it would be such a shame to spoil this lovely village by making it bigger. So many people use and enjoy the walks nearby and there is always plenty wildlife to watch. There is such a small undeveloped area between here and Perth but enough distance that you can walk between each. Traffic would obviously increase in and around the village as well. If more housing is needed surely it would make sense to add to larger places such as Perth itself instead of taking away from the small village feel of Luncarty. I moved here 7 years ago and love the community spirit and have always felt welcome which are things that just wont be the same if Luncarty is made bigger.

My Fiance lives here and also shares my views.

Please let us keep Luncarty as it is for the future!

Heather Duncan
5 Tayview
Luncarty
Perth
PH1 3HE

[REDACTED]

From: Lesley Lahay [REDACTED]
Sent: 10 April 2012 16:03
To: TES Development Plan - Generic Email Account
Subject: Crieff
Follow Up Flag: Follow up
Flag Status: Green

I wish PKC to know I disagree with the housing development plans in Crieff. I live in Crieff as it has many green sites and do not want to see areas with ugly housing development where there were once fields and trees. Especially as there is enough housing already. There is not the infrastructure in Crieff, drains etc to accommodate more people.

I am very upset about the proposed development at Broich, of 300 houses. This is an area where people walk there dogs, an area where there is peace and tranquillity near the town centre..Why would you want to take that away?

The High street in Crieff is dying.It looks awful. The roads around the town are of third world standard. The library has been moved and is not access able to people who have no car. It is all going backwards.

I have been abroad for 6 months and was only aware of this very recently. I believe most people are not even aware of your intentions.

Yours sincerely ,
Lesley La Hay.

From: L YSA [REDACTED]
Sent: 10 April 2012 21:12
To: TES Development Plan - Generic Email Account
Subject: Pr oposal Comments
Follow Up Flag: Follow up
Flag Status: Completed
Attachments: Pr oposal Comments.docx

Please see attached letter,

Thanks

Lysa Wallace

11H Stormont Street,

PERTH, PH1 5NW

[REDACTED]

6th April 2012

Planning and Regeneration

Dear Mr Littlejohn,

Proposal for development at St John's School, Stormont Street, Perth

I would like to voice my concerns over the above proposed development. I have concerns if there were to be 50 residential units put into the area that there would be insufficient parking, at the moment parking is already a problem, often finding myself parking in Bells Sport Centre or St Catherines Retail Park, further flats would only increase this problem.

If the building was to be altered it would affect my view and the amount of light I get.

I would like to see the building used, but for a suitable amount of units with allocated parking within.

[REDACTED]

I hope you will take my points into consideration before granting planning permission,

Thanks in advance,

Lysa Wallace

Your Details

An asterisk (*) indicates a required field.

Your Name: *	<input type="text" value="Willie Robertson"/>
Organisation Name:	<input type="text"/>
Agent Name:	<input type="text"/>
Address 1: *	<input type="text" value="85 South Street"/>
Address 2	<input type="text" value="Milnathort"/>
Address 3	<input type="text" value="Kinross"/>
Postcode: *	<input type="text" value="KY13 9XA"/>
Phone Number:	<input type="text"/>
Email Address: *	<input type="text" value="REDACTED"/>
Site Name:	<input type="text"/>
Contact Person:	<input checked="" type="checkbox"/> Me <input type="checkbox"/> My Agent

Your comments will be applied to the following items:

7 Kinross-shire Area Spatial Strategy - 7.2 Kinross and Milnathort - Paragraph 7.2.6

I would like site E17 removed from the proposed plan. I would like to see the industrial land already identified in the plan developed before this site is considered.

7 Kinross-shire Area Spatial Strategy - 7.2 Kinross and Milnathort - Paragraph 7.2.9

I agree that site E21 be retained for employment purposes.

7 Kinross-shire Area Spatial Strategy - 7.2 Kinross and Milnathort

I don't want to see the southern end of H46 developed as it would adversely affect Davis Park and the path running from Davis Park to Gallowhill Road. I would like to see the housing allocation moved to the former site of the Kinross High School.

7 Kinross-shire Area Spatial Strategy - 7.2 Kinross and Milnathort - Paragraph 7.2.17

The former high school site should be used for housing but some land retained to alleviate the parking problems which exist in Kinross. Part of the housing allocation from H46 should be transferred to OP12.

7 Kinross-shire Area Spatial Strategy - 7.2 Kinross and Milnathort - Paragraph 7.2.2

I would like to see the former garage site in Westerloan, Milnathort (currently unable to be developed due to perceived flood risk) be zoned for car parking. There is a great lack of parking in the village of Milnathort and this will only get worse when Milnathort Town hall is upgraded.

7 Kinross-shire Area Spatial Strategy - 7.4 Blairingone - Paragraph 7.4.1

I would like to see a larger housing allocation for Blairingone. This would help to safeguard the long term future of the school and take some of the housing pressure off of Powmill.

7 Kinross-shire Area Spatial Strategy - 7.15 Powmill - Paragraph 7.15.5

I would like some of the housing allocation for Powmill transferred to Blairingone to help safeguard the long term future of the school. I would suggest at least 20 houses.

Object: Site H25 - Access not to be taken
RECEIVED from R-P Drive
Object: Site H26 - Improved access
05 APR 2012 required

14 ROSAMUNDI Rep no. 00926/1

LONGFORDAN

DUNDEE DD2 5EF

4th April, 2012

00926/1

Dear Mr Baxter

PROPOSED LOCAL DEV. PLAN H25 + H26

REFERENCE 08/01890/IPM

While we do not object to the development of the above plans we would be unhappy and would consider it reckless for work to start before access to the two sites was very much improved.

For example a route to H25 other than Rosamunde Pitcher Drive, which at the moment, would appear to be the only existing, available access. The disturbance would be enormous for everyone.

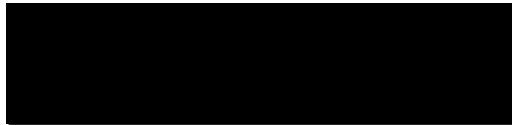
Both Plans would be making use of Station Road and its junction

with Main Street is too narrow and tricky enough now. Main Street cannot cope now.

In our humble opinion, adding to the extra traffic which would occur on Main Street, would be dangerous. It is bad enough now.

There should be a 20 MPH zone from Station Road to the Church now.

Yours sincerely



IAN MURRAY.

RECEIVED

10 APR 2012

K. A. M. Arton
10 Bramblefield
Oakbank
Crieff
Perthshire
PH7 4LU
Tel: [REDACTED]
Email: [REDACTED]

To: David Littlejohn
Head of Planning and Regeneration
Perth & Kinross Council
Pullar House
35 Kinoull Street
PH1 5GD

Date: 6 April 2012

Dear Sir,

Local Development Plan H55

I am writing to register my objection to the proposed plan to build housing on a site at Laggan Road in Crieff (plan H55).

First, I feel that there is more than enough new housing already built or planned in Crieff to meet the needs of the community, in particular the extensive developments adjacent to the new High School and Community Centre.

Second, any development in Laggan Road will cause serious access problems. Laggan road itself already becomes severely restricted at times due to parked cars belonging to people using the local park amenities and local walks. There is no alternative access except through the existing housing on Horseshoe Drive, and that would be completely unacceptable. Additionally, the one-way restrictions on Turretbank Road at McCrosty Park would cause serious congestion if there were more cars heading to Laggan Road. Suggestions that Turretbank Road be made one way only with Crieff-bound traffic having to along the A85 would also be totally unacceptable.

Third, new housing at this location would have an adverse impact on the area's attraction to tourists, as the immediate vicinity is the starting point for walks to many local beauty spots, in particular Lady Mary's Walk.

For these good reasons, and those which other people will no doubt raise, I would urge you to reject this plan.

Yours faithfully,

[REDACTED]

Dr. Ken Arton, BSc, PhD, MIET



Incorporating Crieff's:-
 Crieff Community Council, Crieff & Strathearn Tourist Association,
 Crieff In Leaf, Crieff Community Initiative, Crieff Residents Association,
 Drovers Trust Group, Pro Market Park Group & Sounds of Strathearn

CRIEFF AND UPPER STRATHEARN PARTNERSHIP
c/o Crosslea, Perth Road, CRIEFF, Perthshire, PH7 3EQ

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

RECEIVED
 10 APR 2012

09 April 2012
 (Delivered by hand on this date)

Dear Sir / Madam

Re: Response to the Proposed Plan 2012 – Strathearn Area Spatial Strategy

The Crieff and Upper Strathearn Partnership (CUSP) wish to make a formal response to the Proposed Plan 2012 – Strathearn Area Spatial Strategy in respect of Crieff (Chapter 8, paragraph numbers 8.3.1 to 8.3.9).

CUSP would make the following observations and recommendations in respect of the above. Please note that observations and any suggested stipulations and recommendations apply equally to each of the proposed development sites (E26, E27, H55, H57, MU7 and Op21).

8.3.2 Spatial Strategy Considerations

CUSP recognises the fact that a new 'hub' is being created in the South of Crieff, centred on the new Strathearn Community Campus, primary school, adjacent supermarket and other newly proposed developments. However, the whole of Crieff is in need of a master-plan. Unless a cohesive, overall 'Master Plan' is in place – i.e. one which caters for the whole town – not just individual proposed developments, there is a danger that the 'old' town centre will continue to decline.

The University of Dundee was recently commissioned by CUSP to produce the *Crieff Town Study: Sustainable Development and Opportunities Appraisal*. Published in January 2012 the report quickly and clearly identified the dangers of piecemeal development.

The Local Development Plan envisages a maximum of 410 new residential units being built in Crieff (H55, H57 and MU7). Though a degree of growth is welcomed, such large-scale development necessarily brings additional challenges to the town. Crieff's infrastructure already struggles to cope. The lack of adequate public transport links necessitates a heavy reliance on the motor car and these problems are compounded by the town's operation as a centre for tourism.

Against this backdrop it is difficult to welcome still further large-scale development which will impose greater strain on an already challenged infrastructure.

A stipulation should be made that any buildings arising from new development, whether for employment or residential usage, be limited in their height to no more than that of the Strathearn Community Campus.

A significant number of unoccupied buildings / brown-field sites already exist in Crieff's town centre. Stipulation should be made that future development of green-field sites should include a requirement for proportional redevelopment of, or contribution towards, the regeneration of one or more of these redundant sites.

With regard to movement and legibility in the town, the University's report stated (para 3.4):

'Historically Crieff was a compact settlement. This retained character, the architectural landmarks and the straightforward layout of the main streets of the town centre makes for an easy general comprehension of place.'

However, a number of constraints have arisen primarily from the way that the physical infrastructure of the town centre is organised and used. These are summarised as follows:

- *The tight form of the historic centre constrains vehicular movement*
- *Priority has been given to the flow of vehicle traffic*
- *Servicing arrangements (loading and unloading) in the town centre are non-existent and contribute to street congestion*
- *Car parking arrangements in the town centre are irrational, free on-street parking but charges in the public car-parks*
- *Inadequate attention has been given to ensuring the safe flow of pedestrians along/across the main streets*
- *Pavements in the historic centre are overly narrow and often congested*
- *The location of key facilities lacks organisation and can confuse the visitor*
- *Signage is generally poor. A number of poorly designed/maintained shop fronts detract from the street environment*
- *Footpaths generally across the town are in poor condition. This short-coming is especially noticeable of the paths linking the Broich developments through the Crieff South area. The problem particularly requires addressing because of the heavy use by school pupils of these routes.*

Unfortunately the sum of these constraints significantly detracts from the attractive qualities of the townscape.'

The University's report also highlighted the following 'Threats to Crieff' (see 4.3):

'Economic pressures and the policy response threaten the quality of life in all UK towns and villages and will most affect vulnerable age and social groups. Drawing upon the analysis presented in Sections 2 and 3 and the preceding scenario of future conditions, the specific threats to Crieff can be summarised as:

- *The loss of younger age groups due to lack of employment opportunities and/or being unable to secure affordable housing.*
- *The likely contraction of general businesses on the High Street in the face of the competition provided by the new Tesco supermarket.*
- *Failing to attract additional spending visitors to the High Street area due to poor traffic management and streetscape maintenance and under-investment by visitor-focused businesses in new specialist outlets.*
- *The risks of poor quality development of the Broich area by following an ad-hoc approach to site development and a failure to adopt a sufficiently comprehensive traffic management scheme.'*

8.3.3 Infrastructure Considerations

Independent traffic consultants should be appointed as per the recommendation made by CUSP in their 'Preliminary Recommendations Report' forwarded to the Council in January, 2011 - ref. 4.4 as follows -

'Appoint Independent traffic consultants:

- To examine, recommend solutions and report on –*
- *The dangers posed by traffic on the A85 trunk road as it passes through Crieff, including: issues of pedestrian and vehicular safety; whether the 'high street' can cope with the speed, size and types of vehicle travelling on trunk roads like the A85; traffic noise and air pollution, and any other trunk road related issues affecting the well being of the town.*
- *The feasibility of implementing alternative, more effective route(s) and/or systems that would enable traffic to safely pass through, or bypass, the town.*
- *Whether the size and style of street sign-age is sufficient to alert visitors to the size and location of the town centre's three main car parks.*

The various traffic issues referred to above have been allowed to persist and develop over a period of years.

CUSP now respectfully request that the Scottish Government's responsible agency, Transport Scotland, prioritise the research and development of appropriate solutions - perhaps jointly with Perth & Kinross Council.'

Crieff's High Street is also the A85 trunk road; it is regularly congested, and presents dangers to residents and visitors alike. A single possible scheme to provide partial relief to the town centre remains. As stated earlier, an overall 'Master Plan' is necessary to ensure key strategic options like this are not irretrievably lost.

This option would see East-to-West and/or East-to-South traffic, which currently has to travel through the town centre, being offered the opportunity to turn from the A85 near Gilmerton on the unclassified (Highlandman) road leading to the junction with the B8062, where a right-turn leads back into the southern part of the town along Broich Road and a final junction with the A822. Similar relief would be achievable for South-to-North and South-to-East through-traffic by following the above route in reverse.

The main benefits of the above relief route include:

- substantial reduction of traffic flow and associated congestion and pollution in the town centre resulting in greatly improved safety for pedestrians and other road users
- through-traffic would not be required to negotiate the town's high street area(s)
- improved access roads for Crieff residents entering and exiting the town
- improved feeder roads to the SE & E areas of the town – including any new development.

Proposed developments – specific concerns

E26 Bridgend – General employment use

1. The junction of the South Comrie road and the A822 in such close proximity to the right- angled bend at the bridge give cause for concern. There are worries that increased volume of traffic from any new development and / or additions to the core path network will add to the dangers to road users and pedestrians.

E27 Broich Road – General employment use

1. This area is outside the town's primary retail core and as such should not be used for further retail development.
2. Development at this location would seem to envisage the demolition or substantial alteration of Category B listed buildings at Duchlage Farm. Concerns have been raised that these buildings, listed as recently as 2002, should not be destroyed.
3. Conversely, the farm and its outbuildings could be sympathetically restored for housing, holiday accommodation or 'micro' business purposes – possibly even a mix of all three.

H55 Laggan Road – Residential site (50 maximum)

1. Repeated concerns have been expressed by local residents about the capacity and effectiveness of the sewage system in this area of Crieff. No substantial additional development should take place in this area without first ensuring that sufficient capacity exists.
2. If additional dwellings are built on this site the access road will need to be widened to allow vehicles to safely pass one another.

H57 Wester Tomaknock – Residential site (60 maximum)

1. Development on the east side of the town should be constrained by the fact that road access to this area is primarily through Dollerie Terrace. An 'unofficial' one way system already operates in this area during many hours of the day as parked vehicles impede the safe passage of two way traffic. Any additional development in or around the H57 area will necessarily add to the already high volumes of traffic and increase the danger to road users and pedestrians.
2. A number of residents have expressed concerns that field drainage in this area is inadequate and liable to flooding. Likewise, concern has been expressed by local residents about the capacity and effectiveness of the sewage system in this area.
3. Road safety issues exist. There are no bus services for the residents of the large estates at Ochil View and Inchbrakie. H57 is even further from the town centre. There are no pavements beyond the current 30mph restriction area, the road to Madderty is a busy well used road which is already potentially dangerous for pedestrians.

MU7 Broich Road – Mixed use (approximately 300 with minimum of 5 ha serviced employment land)

1. This is a huge development for a town the size of Crieff. One of the town's most attractive features is that none of its existing estates are so large as to dominate, and the mix of building styles provides a sense of place. If permission is given to build large numbers of houses in this area, the variation in styles and quality of build needs to be maintained.
2. The B8062 is already narrow for the type and volume of traffic it carries. New developments will only serve to exacerbate these problems. Widening of the road should be a pre-requisite condition.

The Proposed Local Plan frequently talks of the need for a 'Master Plan' when referring to specific proposed development sites. This inappropriate use of the term contributes to the danger of ad hoc, piecemeal development referred to above.

Whilst it is feasible to produce a comprehensive plan for individual developments, concentrating on these alone risks neglecting what may be limited opportunities to carry out a holistic approach to current and future infrastructure, development, growth and regeneration needs of the town.

CUSP would urge the planning authority to ensure that Crieff benefits from a comprehensive master plan for the **whole town**.

Yours faithfully,



J. Ewen Macgregor
(Chair)



John Champion
(Secretary)

Note: Copies of the documents from which extracts have been quoted above can be found via the following link <http://www.crieff.org/communitygroups/document-download-pages.html>

5 April 2012

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

RECEIVED
10 APR 2012

Dear Ms Murray

Proposal for Development at Laggan Road, Crieff H55

My wife and I wish to object to the proposed development at H55 Laggan Road, Crieff and do not wish it included in the local plans.

We have lived in the area for over 30 years and have watched both Betts Developments built. These developments have already resulted in an enormous increase in traffic to this area and we had to give away part of our garden to the Council to widen the Turretbank Road also included a new pavement. This road is still inadequate for the volume of traffic and has become a "race track" leading onto a single track bridge. The routes into the town from this area are via relatively poor road systems with single track bridges, narrow roads at Milnab Street or via the main Comrie to Crieff Road which already has tight bends and poor road surfaces crumbling into the MacRosty parks.

The proposed development of 50 houses will only increase the existing number of cars in this area, including more buses and commercial vehicles. The type of housing suggested, including 25% affordable housing would obviously significantly increase the numbers of children required to be bused to school. This would increase the costs to the council of providing buses as this is about the furthest point in Crieff away from the local schools.

The regeneration of the MacRosty Parks has produced a huge increase in traffic to this area, especially at weekends, Easter Holidays, Summer, October holidays and special events at the parks. This has already lead to vehicles parking dangerously on surrounding roads near the MacRosty park.

This area of Crieff leading to Lady Marys walk and the Laggan Woods is of great natural beauty. The existing density of housing, which includes relatively large landscaped gardens, is an esthetically pleasing progression from town to countryside. The proposed 50 houses on that size of site would not replicate this.

Yours sincerely



Dr & Mrs J L Graham
Oakbank, 2 Laggan Road, Crieff
PH7 4LQ

RECEIVED

10 APR 2012

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

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 10th 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

Address and
Postcode

DR WILLIAM L. MACINDOE
9 LANGSIDE DRIVE
COMRIE
PH16 2JR

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.

H58

or

Chapter

8

Page no.

Paragraph no.

8.7.2 & 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.

NO ADDITIONAL HOUSES SHOULD BE BUILT

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

NO NEED FOR MORE HOUSES IN COMRIE.
PRESSURE ON LOCAL SERVICES.
PRESSURE ON ACCESS ROADS.

7/4/12

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

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

Perth and Kinross Local Development Plan – Proposed Plan Representation Form

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

Name **MORAG AITKEN (MRS)**
Address and Postcode **BLARUACH, SOUTH CRIEFF ROAD, COMRIE PH16 2HF**

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.

Site ref. **H58**

Chapter **8**

Page no.

Paragraph no. **8.7.2 and 8.7.4**

or

or

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.

PROPOSED CHANGE TO PLAN

Exclude site H58 as a housing development site.

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

Amenities in our village are already stretched so it would cause difficulties if another 30 families were to come. The property market is currently depressed & houses which have been for sale for several years are not selling so a further 30 houses on the market just doesn't make sense. The site has been agricultural land for generations.

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

Save a copy

Print

Submit

RECEIVED
10 APR 2012

Perth and Kinross Local Development Plan – Proposed Plan Representation Form

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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 **NEILL B. AITKEN**

Address and Postcode **'BLARUTACH', SOUTH CRIEFF RD., COMRIE
PH6 2HF**

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.

Site ref.

Chapter

H58

8

Page no.

Paragraph no.

or

or

8.7.2 & 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.

PROPOSED CHANGE TO PLAN

TO REMOVE SITE H58 FROM THE PLAN AS
A HOUSING SITE.

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

SPECULATIVE HOUSING DEVELOPMENT
IN THE SAME AREA HAS LED TO
DEVELOPED PROPERTIES LYING
EMPTY FOR TWO YEARS OR MORE -
EVEN BEFORE THE CREDIT CRUNCH,
CLEARLY DEMONSTRATING THE LACK
OF DEMAND FOR ADDITIONAL ^{PRIVATE} HOUSING
IN THE AREA. FACILITIES ARE ALREADY
AT FULL ~~STRETCH~~ AND THE INFRASTRUCTURE
HARDLY NEED ADDITIONAL STRAIN PLACED
UPON IT BY UNPRODUCTIVE
DEVELOPMENT.

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

Save a copy

Print

Submit

Sasha Brunton
Laggan Farm Cottage
Crieff
PH7 4JL
6 April 2012

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

10 APR 2012

Dear Sirs,
Local Development Plan Site reference H55 50 residential units/houses.
I would like to object to the proposed change in the development plan for site reference H55 Laggan Road.
I live along Laggan Road and have done since 1997. Laggan Road is the lane I use to access my home and I understand that Laggan Road will be used as access for this proposed development.

There are a number of reasons why I want to object as follows,

1- Local Development Plan

I have read what there is by way of an explanation about the Local Development Plan for Crieff and it states quite clearly that the best location for any expansion in the town is to the south. This makes complete sense, it is where the school/community campus, Library, sports hall etc are and the likely location of a Tesco supermarket. It is also the location of a further proposed expansion of 300 residential units (being applied for by the same landowner as in H55).

There is clearly not the need for both residential sites so as the proposal suggested any expansion should be centred to the south of the town; I do not understand why this site is even being considered in light of the clear statement identifying the best area for expansion.

2- Access

Access is severely restricted along the lane and I understand that it is proposed to serve the site. Currently 9 homes have access along Laggan Road along with the farm access and it is in reality no more than a farm track. Where the lane splits off from Laggan Road itself the access is no wider than the average family car and there is no room for widening it on either side. Traffic currently is at a sensible level but with commercial vehicles required to access the site through the lane I cannot see how this is possible while continuing to give current home owners access as it stands. Add to this the long-term congestion and bottleneck that an additional 100 or so cars will add I fail to see how this access is a viable option. The situation will be unbearable with the increase in traffic to the proposed level.

I do not believe there is sufficient room along the lane to construct a two-way road, which is what will be required to serve so many houses.

3- Traffic congestion and accident risk at Macrosty Park parking area.

Macrosty Park has recently had an overhaul and is widely used by the people of Crieff and surrounding area, the parking area has two single lane bridges, one at either side and there is already congestion at these bridges and an increased accident risk. By increasing the housing levels as per the proposal this will add to both problems significantly in this area.

4- Land Use change


The land proposed for this building development is grade 1 agricultural land. There are numerous examples of sites in and around Crieff of land, which is brown field or where the quality of land is much poorer in condition and would not be such a loss as this proposed site.

5 No definable need

Finally I would suggest that there is no demonstrable need that has been identified anywhere for this number of houses in this location when immediately beside the site is another private building site with unsold houses and ample room for more construction which is not going ahead because of the lack of buyers. As I understand it even the development around the Skye Terrace area which is within the original development plan to the south has not been finished due to lack of demand and with an application for a further 300 houses planned for that area I cannot see any reason for granting permission to develop the land at Laggan Road as well.

The fact that the landowner involved has, in the recent, past benefited from a major housing development on the edge of the town, has an application in for 300 residential units to the south of the town and is now asking for this site in addition is simply unreasonable and should be refused.

Yours faithfully,



Sasha Brunton

Alan Brunton
Laggan Farm Cottage
Crieff
PH7 4JL
6 April 2012

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

RECEIVED

10 APR 2012

Dear Sirs,
Local Development Plan Site reference H55 50 residential units/houses.
I wish to object to the proposed change in the development plan for site reference H55 Laggan Road.
I live along Laggan Road and have done since 1997. Laggan Road is the lane I use to access my home and I understand that Laggan Road will be used as access for this proposed development.

There are a number of reasons why I want to object as follows,

1- Local Development Plan

I have read what there is by way of an explanation about the Local Development Plan for Crieff and it states quite clearly that the best location for any expansion in the town is to the south. This makes complete sense, it is where the school/community campus, Library, sports hall etc are and the likely location of a Tesco supermarket. It is also the location of a further proposed expansion of 300 residential units (being applied for by the same landowner as in H55).

There is clearly not the need for both residential sites so as the proposal suggested any expansion should be centred to the south of the town; I do not understand why this site is even being considered in light of the clear statement identifying the best area for expansion.

2- Access

Access is severely restricted along the lane and I understand that it is proposed to serve the site. Currently 9 homes have access along Laggan Road along with the farm access and it is in reality no more than a farm track. Where the lane splits off from Laggan Road itself the access is no wider than the average family car and there is no room for widening it on either side. Traffic currently is at a sensible level but with commercial vehicles required to access the site through the lane I cannot see how this is possible while continuing to give current home owners access as it stands. Add to this the long-term congestion and bottleneck that an additional 100 or so cars will add I fail to see how this access is a viable option. The situation will be unbearable with the increase in traffic to the proposed level.

I do not believe there is sufficient room along the lane to construct a two-way road, which is what will be required to serve so many houses.

3- Traffic congestion and accident risk at Macrosty Park parking area.

Macrosty Park has recently had an overhaul and is widely used by the people of Crieff and surrounding area, the parking area has two single lane bridges, one at either side and there is already congestion at these bridges and an increased accident risk. By increasing the housing levels as per the proposal this will add to both problems significantly in this area.

4- Land Use change

The land proposed for this building development is grade 1 agricultural land. There are numerous examples of sites in and around Crieff of land, which is brown field or where the quality of land is much poorer in condition and would not be such a loss as this proposed site.

5 No definable need

Finally I would suggest that there is no demonstrable need that has been identified anywhere for this number of houses in this location when immediately beside the site is another private building site with unsold houses and ample room for more construction which is not going ahead because of the lack of buyers. As I understand it even the development around the Skye Terrace area which is within the original development plan to the south has not been finished due to lack of demand and with an application for a further 300 houses planned for that area I cannot see any reason for granting permission to develop the land at Laggan Road as well.

The fact that the landowner involved has, in the recent, past benefited from a major housing development on the edge of the town, has an application in for 300 residential units to the south of the town and is now asking for this site in addition is simply unreasonable and should be refused.

Yours faithfully,

Alan Brunton

RECEIVED

10 APR 2012

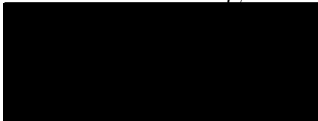
Local Development Plan Team
The Environment Service
Perth & Kinross Council
Pullar House
35 Kinnoull Street
Perth
PH1 5GD

6 Galloway Crescent
Crieff PH7 4LG
2Nd. April 2012

Dear Sirs,

Please find attached Representation form in respect P & K Local Development Plan. I tried to forward this via e-mail and the online submit button on the form but found that this did not appear to operate on my system.

Yours sincerely,

A black rectangular box redacting the signature of Robert Whyte.

Robert Whyte.

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:

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 10th 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	Robert Whyte
Address and Postcode	6 Galloway Crescent Crieff PH7 4LG
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.	H55	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.

I am opposed to the plan and I am against any residential or commercial development of this site.

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

The proposed site adjoins the old Laggan farm Road which is an access way to a renowned tourist and local walk way/beauty spot - Lady Mary's Walk.

The proposed development is on prime green belt land that has been actively cultivated and farmed for many years. Development for housing on this site would severely detract from the tourist amenity and alter the natural balance of the area.

Furthermore the road infrastructure serving the access to the site is not adequate for additional traffic particularly heavy construction traffic and the additional residential car traffic that would result from a further fifty households.

The present access road down Milnab Street in my opinion is an accident waiting to happen where this road narrows at Milnab Terrace. The extra traffic on this road could also be potentially hazardous at the bridge at the Milnab St./Sauchie Rd. junction, at the Turret bridge and at the access/egress to the main car parking area for MacRosty Park adjacent to Park Manor.

Although there is an alternative access route via Comrie Rd. onto Turretbank Rd. this again is not particularly desirable given that additional traffic access to/from Comrie road could result in a potential accident blackspot

If it is considered that there is a need for additional housing in the Crieff area I feel that a more suitable location would be to the south east of the town in the Broich Rd. area.

12, RINGDOLE AVE

CHIEFF.

PH7 3SS

14th APRIL 2012

PIKE


PHONING Dept.

Dear Sirs,

18 APR 2012

Please find enclosed a copy of my representative to yourselves, in respect of, area H57. As you can see this was sent in all good faith on Monday the 12th of April 2012 at 12.44. When I returned I discovered this message on my laptop. I do not know if you have received this message or not, but if not, even although the date is wrong, please accept my submission as the spirit it was sent.

Yours sincerely


(ROBERT LAUCHMAN)

From: (Unknown Sender)

To: boblauchlan [REDACTED]

Subject: I am making representation on Proposed Plan for Crieff

Date: Mon, 9 Apr 2012 12:44

Attachments: Attachment (139)

RECEIVED

18 APR 2012

Your message could not be sent.

A transcript of the attempts to send the message follows.

The number of attempts made: 1

Addressed To: DevelopmentPlan@pkc.gov.uk

Mon, 09 Apr 2012 12:44:13 +0100

Failed to send to identified host,

DevelopmentPlan@pkc.gov.uk: [172.29.2.230], 550 5.1.1 User unknown

--- Message non-deliverable.

Securing the future... - Improving services - Enhancing quality of life - Making best use of public resources.

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Requests to Perth & Kinross Council under the Freedom of Information (Scotland) Act should be directed to the Freedom of Information Team - email: foi@pkc.gov.uk

Attached Message

From: Bob Lauchlan <[REDACTED]>

To: DevelopmentPlan@pkc.gov.uk

Subject: I am making representation on Proposed Plan for Crieff

Date: Mon, 9 Apr 2012 07:44:10 -0400 (EDT)

1 Name Robert Lauchlan
12 Rintoul Av
Crieff
Ph73SJ

2 I am making representation on Proposed Plan for Crieff

3 Site Ref H57

4 I would like to change the plan

5 My reasons are as follows

(a) The site shown on the map is unsuitable for building as the ground is very wet for 6 months and is flooded for the rest of the year. Towards the end of 2011 cattle were in the field and they were sinking at least 12" into the mud. The field lies at the bottom of a steep hill and water from this plus the burn, which often runs in spate, causes to flood. The local opinion is that the centre of the field is lower than the burn giving a U tube effect.

(b) Given that the new Primary School is going even further south than the existing one, the proposed site H57 is too far for young children to walk especially on a wet day, and goes against the Council's declared desire for more children to walk to school. I would like to see MU 7 fully developed and the ground west of the Campus used for housing. Also there is still ground adjacent to Inchbrakie still to be developed. This would have all the children in the one area for Primary, High School, Library, Swimming Pool, and other recreational facilities within walking distance.

(c) Traffic Impact Given that the proposed development goes ahead and that 60 units are built, and that the national average in a rural area is 1.7 per household, this would mean another 102 cars a day coming onto a B class road and placing an intolerable burden on Dolerie Terrace which already suffers from all the new development not only in Crieff but further east. More and more cars coming from Perth are using this road as an alternate to the A85, and although the police set up speed traps at the bottom of Dolerie Terrace, drivers continue to speed endangering all who use this road.

(d) In conclusion I would state, I have lived and worked in Crieff for 50 years, 35 at this address and think that H57 is totally unsuitable for development. That Crieff should not be developed any further east until all other areas have been developed especially in the area around the schools. Also no further building be allowed not only on H57, but further east until an alternate to Dolerie Terrace can be found.

Robert Lauchlan

Securing the future... - Improving services - Enhancing quality of life - Making best use of public resources.

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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

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 10th April 2012** and it is essential that you ensure that representations are with us by then.

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

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

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

Name	Mr Clive Narrainen
Address and Postcode	143 Nailsworth Crescent Merstham Redhill RH1 3JE
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.	<input type="text"/>	or			
Chapter	<input type="text" value="7"/>	Page no.	<input type="text" value="203"/>	Paragraph no.	<input type="text" value="7.2.6"/>

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

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

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

I am supporting improved pedestrian/cycle links with Kinross as a pedestrian and cyclist

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

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

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

From: Philip Gill [REDACTED]
Sent: 08 May 2012 16:24
To: Alasdair Finlayson
Subject: Development Plan - North Scone
Follow Up Flag: Follow up
Flag Status: Green

Hi Alasdair

My original submission via the PKC website went astray.

Briefly

Ref: H29 Chapter 5.33 Scone North

I wish to change the proposed 700 housing development and reduce this figure to 200.

In the same development, I wish to propose an increase in the affordable housing percentage from 25% to 35%.

Kind regards
Philip Gill

From: Bitney MacNab [REDACTED]
Sent: 09 April 2012 11:21
To: TES Development Plan - Generic Email Account
Subject: Master Plan for Auchterarder and the Committee Report of 2008
Follow Up Flag: Follow up
Flag Status: Red

Dear Sirs

I took time to visit your representatives at Auchterarder Community School who were there to try and answer questions relating to your Master Plan for Auchterarder.

I have a number of comments/questions to make and would very much appreciate a response detailing what action has been taken to address the issues. I have copied in paragraphs from the Master Plan and the Committee Meeting of March 2008 and added my comments/questions in red.

2.5 SPP8: Town Centres and Retail highlights the need to focus retail and commercial leisure development in highly accessible locations, particularly town centres. The development of the Framework will support local services, retail, community and business uses within the existing town centre of Auchterarder. **Can you please give detail on how the Master Plan caters for this.**

SPP 17: Planning for Transport

Auchterarder expansion presents an opportunity to create a high quality, well connected place, which enhances the urban and landscape character of the town. This can be achieved by holistically thinking about the site and how the various elements of development, buildings, streets, spaces and landscape can be brought together in an integrated way which responds to the specific character and sensitivities of the site. **Again can you give detail.**

'Designing Places' recognises the physical qualities that can make Scottish towns, cities and villages distinctive, welcoming and memorable. It identifies six key qualities of successful places:

- 4 Identity,
- 4 Safe and pleasant spaces
- 4 Ease of movement - **if the Master Plan proceeds (as it appears it inevitably will) the "ease of movement" will most certainly not be in the main High Street of Auchterarder, which is already congested.**
- 4 A sense of welcome
- 4 Adaptability
- 4 Good use of resources

In summary Auchterarder is perceived to be a pleasant prosperous rural town set in the attractive Perthshire scenery of hills and fields. It is strongly identified by its High Street, which forms the focus for communal life. Recent built extensions, whilst ignoring the historic plan form, have nevertheless avoided introducing totally alien materials or colours.

630 vehicles in the western road to feus road in peak time traffic to predicted 960 vehicles (page 54) of master plan **I fail to see how this increase is sustainable through Townhead, High Street and Feus as the road**

currently stands with the on street parking for residents and shoppers currently stands.

!"The calculated masterplan generated traffic was superimposed onto the base design year traffic flows to provide traffic flow forecasts for the design year 2013 including the Masterplan development. The predicted traffic volumes are shown in DBA Figures 4a & 4b (Appendix 3). The maximum 2-way traffic flow on the main Western Road-High Street- Feus Road corridor is predicted to be some 900 vehicles per hour between Ruthven Street and Hunter Street during the 2013 AM peak and 960 vehicles per hour between Castleton Road and Ruthven Street during the 2013 PM peak hour. This level of traffic flow is well within the capacity of the road and there will be no significant traffic congestion as a result of the development." Page 54 This statement, I cannot conceive to be accurate, the current flow and congestion within the roads/streets in question is already unacceptable. Can you please provide further detail on measures that will be taken to prevent any further congestion whilst providing sufficient parking for both residents on the streets/roads detailed above.

P&KC Public Transport Section have advised that the town currently lacks a 'town service' because of the size of the town and the linear nature of the existing settlement. It is considered by P&KC that the proposed development could be the catalyst to deliver this facility by increasing demand and modifying the road system to facilitate a loop/circular bus route. In addition this type of service may also provide a facility for the reduction in traffic generation by means of providing a link to Gleneagles Station for commuter trips to Stirling and Perth.

The provision of a new Traffic Distributor Route from Feus Road to Hunter Street within the Kirkton in tandem with the existing Hunter Street would permit a bus service to circulate from the town centre through Kirkton & Castlemains. This route could (The word could implies that it may or may not happen like so much of the infrastructure of the plan. Could you confirm more details on exactly what measures WILL be put in place) extend from the town centre to Gleneagles Station via Muirton and the grade separated A9 / A823 junction.

The new roads infrastructure within the development areas would be designed to accommodate bus services with any traffic calming measures avoiding the use of vertical speed reducing measures, such as speed bumps and raised junction tables. Part of the community facilities contribution of 0.51million will go towards an improved public transport system. Page 55

4.5 Affordable Housing Provision

The Auchterarder Development Framework acknowledges the need for additional affordable housing in Auchterarder and that the provision sought through the Development Framework should reflect the Council's current affordable housing policy of 25%. The DTZ Pida 2003 Survey which covered the five year period from 2003 to 2008 recommends that around 25% of the additional affordable housing should be social rented accommodation with the remaining 75% being low cost home ownership. An updated review of the needs assessment is awaited. This document is dated March 2008 - has their been a review and if so what decisions have been made based on the review?

Through discussions with the Council's housing service, it has generally been accepted that these criteria should be deliverable through the period of this Development Framework. Given the Development Framework provides for 800 houses, the affordable housing currently required should be circa 200 units of which 50 require to be social rented and 150 require to be low cost home ownership.

The Consortium has been in discussions for some time with a registered Social Landlord (RSL) for the provision of affordable housing at the

Townhead location to the east of Glenburn Road and to the west of the Provost's Walk and A9.

It is fully intended that the Consortium will provide serviced land at an agreed DV valuation to an RSL, in line with Phase 1 housing development. Detailed plans have already been prepared for a Phase 1 and Phase 2 affordable housing release at Townhead (see plan). Phase 1 is 53 units of which there is a mix of flats, cottages and various terraced house types. Phase 2 is a further 22 flatted units and from preliminary discussions with Hillcrest Housing Association, it is envisaged that these units will provide mixed tenures of both social rented, shared ownership, homestake as well as discounted properties for sale.

The proposed release of Townhead Phase 1 (53 affordable units) will be in line with the first phase of private housing (for sale) with the second phase of 22 affordable units being released after the completion of 350 units, as part of a wider affordable housing proposal within the Development Framework. **Please can you provide a detailed plan of the location of the social/affordable housing within each proposed phase, Kirkton, Castlemains and Townhead.**

This is initially being limited to 16% due to the constraint being placed on the Consortium by Scottish Trunk Roads until the Shinafoot Junction Improvement can be delivered. Thereafter, the following phases inclusive of the 22 units will bring the % of affordable units back up to the 25% provision currently sought by the Council's policy.

Phase 1 Townhead is also included by Hillcrest Housing Association in the context of their Strategic Housing Investment Plan which programmes site start in January 2009 and will also form part of their Strategy and Development Funding Plan submission for Perthshire to Communities Scotland in December this year. Page 46

I am very aware that the Master Plan does not show the additional developments that have been given planning permission that are not within the "scope" of the Master Plan, namely:

Bottom of auchterarder Stuart Milne more houses

Planning behind houses on Feus Road for 11 residential homes

Extension of Lundies Walk a further 22 homes

Old Cinema another 11 apartments

In short another 50 homes which would appear not to have been considered in the "Master Plan" which will impact on the volume of traffic and continuing growing congestion within the main "High Street" .

2.14 Noise Assessment

Site noise from the A9 on the Townhead site has been measured and the resulting report and figures are included in Appendix 4, with a summary of the findings below.

The site noise from A9 traffic varies with location and the levels reduce with distance from the road. The reduction is less than expected by theoretical calculation as the rising ground exposes higher parts of the site to noise from sections of the A9 to the east and west. The noise from these areas varies with wind direction and traffic flow.

However, the assessed and measured levels indicate that the site is not subjected to traffic noise levels which would have an adverse effect on the proposed development. The levels in the report refer to existing and projected site levels and there may be some variation in actual façade levels when the houses are built. There may be some increases if houses are close to the A9 and are multi storey, whilst these will be decreased further from the road due to the screening effect of the intervening buildings.

As Category B of PAN 56 requires that houses are to be adequately protected from noise, it will be necessary to take account of this in the final plans for the site layout. **I read this paragraph with interest. Please can you confirm what consideration has been given to the residents of the "Main Street" of Auchterarder, namely Townhead, High Street and the Feus in terms of noise pollution from the increased volumes of traffic that are projected, forecast and inevitable if**

the full plan proceeds.

2.15 Parking Assessment

A recent study by Perth and Kinross Council on the current parking provision within Auchterarder recognises that the current parking provision within the town centre has been under pressure for some time.

Current provision is largely covered by either on street parking to High Street or by the central off-street car park. Available parking on High Street is toward the east and west ends of the street, some distance from the central destinations. The geometry, road layout and residential nature of side streets mean that beyond offering residential parking they do contribute greatly to the parking provision within the town centre.

The current parking provision is for 165 spaces within the town centre, an estimate by Perth and Kinross Council predicts a 12% increase by 2015 bringing the provision to 185. A development of 800 units (Opportunity 3) would increase the town size by approximately 30% requiring an additional 56 spaces, a total of 76 spaces being required further to the current provision by 2015.

To alleviate the parking problems the council have proposed a number of solutions (Please provide details of the solutions to allow residents to make an informed choice about what will be changing in relations to parking within the town) which either control the existing parking by the use of time limits

or charges or by the provision of additional parking. Within the statement by Perth and Kinross Council the 76 additional spaces required by 2015 could be more than accommodated within the town centre on two possible sites. The Council are also looking into the potential relocation of business uses to the new employment site in order to free up land in the town centre, perhaps for car parking. Initial market appraisals for new employment land will investigate potential demand.

The Consortium will continue to work with the Council in developing a strategy for the additional parking requirements for the town.

Committee Report 26 March 2008

ROADS AND TRAFFIC

Mini-roundabouts and distributor roads will not take away from the large increase in traffic through the centre of the town

Roads in the summer will be much busier and will increase pollution for residents in the High Street / increasing numbers of commercial vehicles / buses will increase pollution and traffic hazards

Increase traffic and pollution will compromise Auchterarder's attraction to tourists

Traffic impact studies deemed necessary at the time of specific planning stages will be required by PKC and any relevant consequences addressed.

It is acknowledged that traffic levels will increase and PKC will require that the necessary measures are put in place to deal with this increase where appropriate Please provide detail.

Traffic will increase on Castleton
Road making exiting at Castleton Rd /
High St unsafe

Traffic impact studies deemed necessary at the time of
specific planning stages will be required by PKC and any
relevant consequences addressed.

If the Transport Assessment identifies a problem at the
junction appropriate measures can be taken **Please expand on this. The junctions currently provide a hazard
for children seeking independence to walk to school a roundabout at the Castleton/High Street junction would
certainly not support our children nor elderly people trying to cross. Traffic lights would present a problem
for High Street and Townhead resident's who's only available parking is on street.**

Traffic lights and / or roundabout
required – no turning points in the
Main Street

Traffic impact studies deemed necessary at the time of
specific planning stages will be required by PKC and any
relevant consequences addressed.

Not an issue for the DC to respond to
There is already congestion in the
High Street which needs to be
addressed

Measures to relieve existing
congestion at High St / Croft Rd and
traffic to and from the public car park
is needed

Noted. Not an issue for the DC to respond to **Noted - but please respond with your proposed remedy.**

**PARKING Parking is a major issue on the main through-fare and none of the comments have given any
details on what remedies will be put in place to address the issues. Please provide detail of the Council's
proposed solutions to allow the community to make an informed decision. Has consideration been given to
the possibility of a small multi-storey utilising the "old cinema"?**

Current parking provision is
inadequate and future parking
requirements are underestimated and
will overload the existing parking
spaces

New car parking is needed – these
should be identified in the masterplan
Side streets do not contribute greatly
to the parking provision in the town
centre

It is accepted that the provision of contributions towards
resolving problems related to parking are appropriate
provided such requirements are directly related to the
developments proposals and the need arises from its
implementation.

Agree that there is an existing problem but disagree that
future requirements have been underestimated. Perth
and Kinross Council (PKC) and the DC will work together
to identify measures to increase the available spaces.

Parking meters / charging is not acceptable – the High Street is residential and people will just move to side streets

Generally towns of Auchterarders size, scale and kind have some form of parking restrictions. This is an option which must be considered to maximise use of parking spaces
CPO powers should be used to acquire land for car parking if necessary

Noted. Noted

Parking problems lie outwith peak hours and should be resolved before major work commences

It is accepted that the provision of contributions towards resolving problems related to parking are appropriate provided such requirements are directly related to the developments proposals and the need arises from its implementation. This seems a rather adhoc approach when there is clearly a Master Plan for proposed housing and obvious research into the parking needs as the development progresses. I therefore find this answer unacceptable and avoiding the issue rather than addressing the issue.

Agree with DC response

The garden of Waverly House could be added to the Crown Wynd car park
PKC have agreed to investigate. PKC agree to investigate this suggestion Has this investigation been carried out and if so what is the conclusion?
The space in front of the telephone exchange could be made available for parking
PKC have agreed to investigate. PKC agree to investigate this suggestion Has this been progressed and if so what is the conclusion?

I look forward to hearing from you.

Yours faithfully
Bitney MacNab

From: Culdees Ecovillage [REDACTED]

Sent: 08 March 2012 14:05

To: Peter Marshall

Cc: [REDACTED]

Subject: Re: Meeting 3rd April

Thank you, Peter, for your mail.

The afternoon of 3rd April will suit us best.

At the moment there are four names on our list, including our architect, and a structural engineer who has been looking at the structure and lay out of the land, but I will keep you updated nearer the time as we will invite people from PKAVS to sit in as well, since our plans are closely linked to their activities and aims. We also will invite people from a Housing Association we are likely to involve, and a local councillor.

Attached you find drafts of a 'List of Income generating Activities' and a 'Jobs-to-be-created' List which form an integral part of our planned eco-village where people work-where-they-live. As you can see, we will create a potential 174.5 jobs in this village! (hence the involvement of PKAVS and EFQM, Housing Association and Councillor)

You can also open the link to our Manifesto in which you can read in more detail what this project is about: <http://www.culdees-ecovillage.co.uk>

As I understand that the deadline for comments on the Local Development Plan, with which you have been touring around in Perthshire, is 10th March, the offered dates in April for a meeting will fall well outside that time-limit: please regard this mail with attachments and link as our comment on those plans. The Local Development Plan does not provide provision for the possibility for our Ecovillage plan

Kind regards,

Rev. Maryse Verkaik-Anand

[REDACTED]

For eco village information please visit:

<http://www.culdees-ecovillage.co.uk> - - [REDACTED]

For Bunkhouse information please visit:

<http://www.culdeesbunkhouse.co.uk> - - [REDACTED]

Culdees ecovillage, Boreland Farm, Fearnan, Aberfeldy, Perthshire, PH15 2PG

On 06/03/2012 16:13, Peter Marshall wrote:

Dear Reverend Mother Maryse Verkaik-Anand,

Further to our discussions last Saturday I can offer the following options for a meeting:-

2 April any time after 12
3 April any time
4 April any time

I have spoken to my Development Management colleagues and feel it would be better to treat this as both a discussion on the Local Development Plan and the requested pre application consultation.

Please let me know which date is best for you and the numbers attending.

Peter Marshall

Strategy & Policy Manager – Planning & Regeneration
Perth & Kinross Council
The Environment Service

Pullar House
35 Kinnoull Street
Perth
PH1 5GD

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From: Maryse Anand [REDACTED]
Sent: 10 April 2012 22:38
To: Peter Marshall; TES Development Plan - [REDACTED]
Subject: Development Plan
Follow Up Flag: Follow up
Flag Status: Red
Attachments: Introduction to Ecovillage Project 100412.doc; Jobs To Be Created in Ecovillage.doc; rsz_colour_map_of_culdees.jpg; care-village drawing.jpg

Dear Peter

Herewith I send in my response to the Development Plan, Tayplan.

In the Tayplan I miss the possibility to create sustainable, resilient eco villages, created from scratch, or even allowing existing villages to develop so that they can be self-contained. Those villages will be the response to the guidelines of the Scottish Government relating to Ecologic Footprints and renewable energy.

In the part of the Development Plan which relates to Boreland Farm, Fearnan, I request amendments so that such ecovillage with a low carbon footprint and renewable energy and Zero Waste where people work where they live and commuting is kept to an absolute minimum, can be created.

We request that Culdees Ecovillage will be seen as a Pilot project and more resilient ecovillages will be developed once the I's are dotted and t's crossed.

I also want to register the fact that in Autumn 2010 I approached you and showed you the Plans of Culdees Ecovillage and requested meetings with you. You wrote me a mail in which you stated that one member of your staff who is experienced with ecological designs would make an appointment with me to discuss the plans.

This never happened..... and in spite of the fact that you were aware of our believe that ecologically designed settlements are in accordance with the Scottish Governments Guidelines and we wanted to be taken serious by you, your Department continued meeting a local developer who is the antithesis of what this Government stands for: he has a reputation of building with a high ecologic footprint. Not only that, but your department was seeking his advice on what should be best for Boreland Farm -our land- and you put his recommendations in the Development Plan, at a high cost for the environment, since all printed documents are now useless. This useless exercise costs the tax payer thousands of -wasted- pounds.

Attached are the draft plans for the Culdees Ecovillage.

Kind regards,

--

Rev. Maryse Verkaik-Anand

View Culdees photo album here:

For eco village information please visit:

<http://www.culdees-ecovillage.co.uk> - - -

For Bunkhouse information please visit:

<http://www.culdeesbunkhouse.co.uk> - - -

Culdees ecovillage, Boreland Farm, Fearnan, Aberfeldy, Perthshire, PH15 2PG

Income generating activities in Culdees Ecovillage within a Community Enterprise structure under the umbrella of the Universal Health and Education Trust:

Draft 08 03 2012 page 1

Introduction:

It is the intention to create a village where there is work for the residents and where commuting to work is reduced to an absolute minimum. The various enterprises will be owned and governed by the participants and are answerable to a board of elected resident Trustees.

As there will be a mixture of Seniors - retired or semi-retired and younger generations, we will have to create income generating activities for the various needs, while ensuring that the village and the grounds are maintained to a high standard. The proposed jobs are named in the "JobsToBeCreated" section, with the number of jobs, in which year of the development of the village they will become available and if they are an 'all-year-round' or seasonal job. At first we were thinking of an obligatory number of hours work that each resident has to donate each week to the village. We are now more inclined to credit each person for the hours they worked, the value of which will be offset against the weekly contribution to the upkeep and running of the village. The value of the credits will be mutually determined in a meeting.

As a number of senior residents have pension credits, they will need a topping-up of their income, to be able to live a dignified and full-filling live. In the "JobsToBeCreated" section an 's' indicates that this job could be done by those seniors.

(We propose to call the senior residents 'Vintagers', as what we call a vintage product in general increases in value over time, and we like the notion that our value increases in the culture of this village, whereas in the modern society the seniors are barely tolerated and definitely not valued and seen more as a burden).

The CoHousing rules are that as much as possible we do things together; to be included in - not excluded from- our society. In turn we cook for each other, which means that for example if we eat together five times a week and we have 30 residents in the CoHousing units, we only have to cook once every six weeks. However, if one cannot cook or definitely dislikes it, or does not have time, one can 'swap' this task for another job with a person who likes cooking, or pay for the hours.

Besides creating earning possibilities for the Vintagers, there is also another group, the early teenagers, who are still too young to be allowed to have a paid job. There are relatively simple tasks which children can perform, and they will collect credits for doing so; at the same time they will gain experience in taking responsibilities. Although they cannot be paid, those accumulated credits can be exchanged for, for example a guitar or violin, or attending a music festival with their peers.

Anybody can choose to donate credits to a chosen Fund, such as the Educational Fund, which will pay the study costs for the residents when they are ready for a Higher Education, or a special vocational course.

A number of other Funds will be chosen by the residents, such as a Holiday Fund or Instrument Fund.

Bunkhouse: This aspect is already well-established with an annual visitor count of over 3000, but at the moment it is only using 45% of its present capacity.

Tourism: 60% of our summer-guests are from abroad

Eco-Tourism: is becoming increasingly popular. We receive a lot of requests from abroad to speak about eco-settlements and we are facilitating a number of Senior CoHousing Projects, the latest in India. We are member of the Global Ecovillage Network, the CoHousing Network (which receives an increasing global interest as more Baby Boomers are looking for alternatives to Older People Homes)

Family gatherings, birthdays, hen and stag parties (the wider community benefits greatly from those as they take part in the locally offered outdoor activities such as rafting, paintballing, sailing, canoeing, archery, cycling and they eat in local restaurants)

Wedding-, separation-, baptism- and funeral ceremonials

Outdoor activity groups like hill walking- and mountaineer clubs, the RAF Rescue Teams who use Culdees as a base for their training

Educational activities

School parties

Courses/Workshops such as:

Sociocracy (Dynamic Governance), Permaculture, Reiki, Yoga, Meditation, ChiGong, Food for Free, Healthy slow cooking, specialist Building techniques, Coffin-casket and Shroud weaving.

A number of those courses are paid for by the European funded Lifelong Learning Programmes through National Grundtvig and Leonardo Agencies.

We have meetings with the Perth and Kinross Social Economy Partnership (which was established in 2004 with the launch of the Scottish Executive Futurebuilders programme. The partnership includes members from Perth and Kinross Council, Perth and Kinross Association of Voluntary Services, Perth College, Perthshire Housing Association, CheckIn Group and Wood Again CIC.) and are applying for funding for a feasibility study for the following planned Community-owned Businesses:

Market Garden:

Veggie box scheme.

Deliveries to homes and restaurants; could be combined with deliveries from farm shop.

Organic farm shop:

Sells produce from market garden, organic packed produce, home-made wines/ciders and preserves, produce and art from local artists, home deliveries to local Time-share units.

Organic vegetarian/vegan coffee shop:

Serves breakfasts and lunch, also for bunkhouse guests and course participants, prepare ready cooked meals to be sold in organic farm shop, orders from bunkhouse guests and Time-share units. It will also serve the mourners who have just buried a loved one.

Japanese -and other speciality- Organic Vegetarian/Vegan restaurant

The resident Japanese monk and nun have build a restaurant in London in 2010 which acts as a trial for the Culdees project. It has proven to be very successful. Another restaurant has been opened in Oban in 2011. The planned restaurant in Culdees is intended to be the largest of the three, as it will attract many of the visiting tourists, partly due to its magnificent views of Loch Tay and partly due to its uniqueness.

Charity shop:

All seniors who come to live in the Senior CoHousing units have to considerably down-size. Many of their belongings could be donated to the charity. The charity shop will provide an essential income for the Universal Health and Education Trust. Having the charity shop on-site next to the coffee shop will be an extra attraction for local people and tourists: charity shops have become more attractive to people, due to diminished spending power.

Antiques and collectables shop: For those items that are too valuable to donate to the charity shop; they can be sold in this shop. A commission would be payable. That income will be used to pay the shop assistants.

The Barn:

At this moment the barn is still an open barn, with sand flooring. It will be glazed in with folding doors, giving an undisturbed view over Loch Tay. At the moment the barn is used for covered BBQ's and can accommodate about a hundred persons. By glazing it in it will also be suitable for all-year round activities such as yoga classes and Tai-Chi/ChiGong and dance. There is a shortage of venues where Yoga Retreats can be given: there is a waiting list for more than two years if a yoga teacher wants to organise a retreat for their students. Since we can offer accommodation as well, this will be an ideal venue for those retreats. A wooden floor with underfloor heating will also be installed. And until the *Transferium* (see Woodland Burial site) is being built, it will also be used for the funeral services.

Woodland Memorial site with burial Co-op

The Woodland burial site will not be for burials only: it will also be for Memorials for those who have long since past on. Also for those who have been cremated, their ashes can be buried under the tree or scattered amongst the trees. A tree can be planted on top of the grave or next to it, instead of a headstone. Pets can also be buried.

A Marketing person will promote the Memorial aspect of this project and local schoolchildren with their families will be involved in specially organised Family Memorial Tree planting Day. A round building with panoramic views (the *Transferium*) will be build for the funeral and memorial services, just above the woodland burial site. There we ceremonially hand over the deceased from this realm to the next. The round building symbolizes the circle of life and death.

The mourners can have something to drink and eat afterwards in the coffee shop or restaurant.

The burial Co-op will have members who either pay a monthly membership or a lump-sum which will cover the cost of their funeral if they do not want to take the risk that their family is burdened with the inevitable rise in cost. (suggestions for details are invited) We are looking into the Legal aspects of this project

Tree nursery:

The trees for the burial site can be bought at the Culdees tree nursery. There will be a variety of trees to choose from: fruit, nut, and predominantly native trees. Shrubs or bushes can be used to bury pets.

Plant nursery: (Text still to be added)

Senior CoHousing:

Communal House- In case the Vintagers decide to eat together during the weekdays only, the large kitchen and dining- and music room can be rented out in the weekends to people who want to celebrate their birthday or wedding day but their house is too small for their now growing family of in-laws and grand children. The guest rooms in the Communal House can be rented out when not booked for relatives or friends of the Vintagers; the other guests can be accommodated in the Bunkhouse. The Senior project will also have 10 Alternative Medicine- and therapy Units which will be rented out -or sold- to various practitioners.

Exercise Pool: An agreement will be sought with the NHS to enable local GP's to send local seniors for treatment and exercises in the pool. This will pay for the upkeep of the pool and the salaries of physio/hydro therapists and pool attendant. The Vintagers will have access to the pool any time when not used for NHS-paid exercise training.

Multigenerational CoHousing:

The planned sound-proofed 'teenage den' within the Common House can be rented out for parties. That income will go to the special teenage account which will pay for extra music equipment, or studies or courses or festivals that the teenagers want to attend.

All jobs within Culdees Ecovillage, including Alternative therapies and Various professions

An agreement will have to be reached by all Culdees ecovillage residents on the salary to be awarded. The proposal is to agree on a for Culdees affordable hourly rate or pay-by-performance, depending on the job at hand.

A high outstanding study loan of e.g. a resident doctor or dentist will be taken over by the Educational Fund if he/she is staying more than five years.

Part of the Culdean ethos is "Pass it on": each expert-in -their-field is expected to pass their knowledge on to the younger generation -through special organized courses or by taking on an apprentice.

(This text is a first draft and if you like to edit or add some, please do send us your suggestion with explanation)





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

26 March 2012

Our ref: CNS/SEA/00515 - CEA111458

Dear Ciara

Environmental Assessment (Scotland) Act 2005.

00515 - Final Environmental Report - Perth and Kinross Council – Local Development Plan - Addendum 2

SNH's response

Thank you for forwarding the Addendum No. 2, Non-Technical Summary and Appendices for the Perth and Kinross Local Development Plan SEA Environmental Report (ER), received in the SEA Gateway on 31 January. We also refer to our previous responses to the ER submitted through the SEA Gateway on 7 February and 30 August 2011.

The production of this additional information is very welcome. It provides further details in terms of the potential significant environmental impacts of the Plan's policies and also mitigation and enhancement measures identified for individual site proposals. It has been very helpful to receive this at the start of the period of representations for the Proposed Plan. All of the information submitted is clearly and logically presented and easy to read.

We are generally content with the approach to strategic and cumulative impacts and identification of sensitivities in relation to the individual sites, and the policy assessment in the Addendum.

However, we do have concerns that the assessment has not identified the significant effects for some sites. The SEA mitigation also generally focuses on generic mitigation measures for individual sites, rather than addressing these significant issues. In addition, where there are significant issues, the SEA does not recommend specific mitigation that may be necessary, such as reduction of site area or not allocating a site at all. We have recommended that mitigation of cumulative effects from the Cross Tay Link Road and LDP are included for the specific sites affected.

We also note that the SEA mitigation/enhancement has only sometimes been translated into developer requirements in the LDP and we encourage a more fully integrated approach between the Plan and the SEA.

Our detailed comments are provided below in relation to these concerns, and to inform the Post-Adoption Statement when the Plan is finalised.

Mitigation and enhancement

Table 8.1: this sets out general mitigation and enhancement measures for each of the 17 SEA Objectives. We have the following comments:

SEA1: Positive: there are some sites which we have concerns that the SEA does not reflect these constraints and provide necessary mitigation. See our comments below on site H40 in Ballinluig.

We recommend reference to protected species surveys where required in the mitigation column.

SEA17: we welcome reference to ensuring landscape capacity studies are carried out.

Appendix C: We particularly support the production of Appendix C, with its clear layout and provision of specific mitigation/enhancement for the future development sites. However, we have some concerns about some of the content of its content.

There is some inconsistency in defining significance of environmental issues. The issues/impacts identified are sometimes not significant – for example, mallard and hedgehog records (page 20). The SEA should focus on the potential significant effects identified for each site and provide enhancement/mitigation measures specifically for these. Much of the mitigation is generic rather than site specific and this could be included in a section at the start. This would then ensure the mitigation in Appendix C focuses on significant negative effects for individual sites.

For example, Site H40 in Ballinluig (page 42 in Appendix C). This is designated as an Ancient Woodland Inventory (AWI) site, with a proposed use for 45 houses. This issue is identified in the 'Issues/impact column'; "4.40 ha of site covered by ancient woodland." However, the relevant enhancement/mitigation refers to:

- "extend new areas of semi-natural or ancient or native woodland planting to reinforce any particularly sensitive areas" and
- "need to survey mature woodland bounding the site..."
- "retention of important trees, structural planting, hedgerows etc"

While all of these measures would be welcome on a site of lesser environmental value, we do question whether it is possible to develop this site for 45 houses without fundamental loss and damage to the AWI site, and therefore suggest that the SEA should recommend modifications to the site boundary or even omission. We refer to our representation ("Impacts on Woodland") for the Local Development Plan Proposed Plan for our full response.

We note that although most significant effects are identified for sites, there are some where the SEA has missed them altogether. For example, woodland areas are not recorded in the SEA in some instances – Aberfeldy (site H37) contains semi-natural woodland but this is not recorded in the assessment in the SEA (page 49 of the Addendum) or mitigation measures in the Appendix C (page 39). It is also not contained in the developer requirements for this site.

Landscape mitigation/enhancement is also omitted in some cases. We have previously provided advice on how landscape impacts could be mitigated for individual sites. For

example, sites H10 and H11 (pages 25 and 26) and how landscape impacts could be reduced on their southern and eastern boundaries.

Cumulative and strategic sensitivities assessment - Addendum 2

We welcome the commitment to identifying strategic and cumulative sensitivities through the SEA. Addendum 2 has generally provided accurate mapping of the strategic sensitivities for each settlement and we are overall content with the written interpretation of the sensitivities. We have made some comments below which we hope will enable this approach to be used to best effect in planning future settlement allocations.

We welcome the approach of mapping cumulative sensitivities through the number of sensitivities present, rather than apportioning weighting to these (page 10), which allows the general identification of the number of potential sensitivities present for each settlement. We also support the approach of providing written interpretation of the cumulative sensitivities for each HMA (e.g. page 12 Perth area). However, some cumulative sensitivities do not appear to be recorded in the assessment:

On page 12, we suggest cumulative considerations for this area are also impacts on woodland through development. Of particular note is impact, fragmentation or loss of Ancient Woodland Inventory/Scottish Semi-Natural Woodland Inventory sites through development.

It would be helpful to include a brief explanation of some of the less well defined sensitivities at the start of this section. This will identify whether there are any omissions and provide a more transparent assessment process. For example, Addendum 2 refers to priority/protected species and biodiversity and landscape sensitivities, but it is unclear how these have been mapped. Some sensitivities which are identified will apply to most areas – such as protected species.

We welcome the mapping of the Dunkeld-Blairgowrie lochs and Loch Leven catchment as sensitivities, but note the River Tay Special Area of Conservation is omitted.

The map legend refers to “Special Area of Concern” – which should read “Special Area of Conservation” (page 20, Addendum 2)

Highland Housing market area (page 45)

Page 49: Aberfeldy Site H37: we note the presence of semi natural woodland in this site but this is not recorded in the SEA.

Kinross-shire HMA (page 64)

Ochil Hills (Op 19) page 74 of Addendum and page 228 of Proposed Plan): Ancient and semi-natural woodland are identified as being present on a large proportion of this site in the Addendum. However, it is not listed in Appendix C in relation to mitigation/enhancement.

Potential cumulative effects of the LDP and Cross Tay Link Road (CTLR)

We agree with the statement in para 6.6. (page 112) that:

“the development of both strategies could however result in negative synergistic impacts to biodiversity and landscape in the Perth area, unless sensitive design and mitigation are incorporated throughout the development and implementation of the proposals.”

We have referred in our responses to the LDP and in the Shaping Perth’s Transport Future strategy (CTLR) (ref. Environmental Report 00463) for the need for a assessment of specific cumulative impacts of the CTLR and the LDP such as impacts on ancient woodland inventory sites. However we cannot find reference to mitigation for this in the Appendix C for

the specific sites mentioned in para 6.3 (Bertha Park, Luncarty, Almond Valley Village, Perth West, Scone and Inveralmond Industrial Estate) which may be affected by the CTRLR and LDP proposals. We recommend that mitigation and development requirements are provided for these. Masterplans (e.g. Bertha Park) also need to take into account mitigation from the CTRLR proposals.

Monitoring (pg 124)

We recommend the addition of a monitoring indicator for loss of AWI/ Scottish Semi-natural Woodland Inventory Sites in PKC area.

Policy assessment

We welcome the policy assessment (page 114), and the assessment of each of the Plans and policies against the 17 SEA objectives.

We consider the detailed assessment of policies in Appendix B to be reasonable. The matrix approach to the assessments and presenting the results is clear, and we support the summary of overall likely effects.

We welcome the screening and assessment of future Supplementary planning guidance for the requirement for SEA (Page 118).

Please note the comments we have provided are in connection with the adequacy of the Environmental Report and are without prejudice to comments that may be made by SNH on the LDP itself.

We look forward to the strategic Environmental Statement ('Post Adoption Statement') to accompany the completed LDP, which will set out how the consultation responses have been taken account of in the final Plan.

Do contact Carolyn Deasley on [REDACTED] if you would like to discuss any aspects of this response further.

Yours sincerely

Ewen Cameron
Operations Manager
Tayside and Grampian

cc Scottish Government SEA Gateway: [REDACTED]

SNH SEA Gateway: [REDACTED]

SEPA SEA Gateway [REDACTED]

HS SEA Gateway [REDACTED]



Our ref: PCS118379/SB
SG ref: SEA00515/ER

If telephoning ask for:
Sofia Billett

Ciára Gray
Planning Officer- Local Development Planning
Perth & Kinross Council
The Environment Service
Pullar House
35 Kinnoull Street
Perth
PH1 5GD

10 April 2012

By email only to: [REDACTED]

Dear Ciára

Environmental Assessment (Scotland) Act 2005
Perth and Kinross Local Development Plan- Proposed Plan- Environmental Report- Addendum No. 2

Thank you for your Environmental Report Addendum No. 2 consultation submitted under the above Act in respect of the Perth and Kinross Local Development Plan- Proposed Plan. This was received by SEPA via the Scottish Government SEA Gateway on 27 January 2012.

We have used our comments to previous consultation responses to consider the adequacy of the Environmental Report- Addendum 2 and this is used as the framework for detailed comments which can be found in Appendix 1. For convenience, these comments have been structured to reflect that of the Environmental Report Addendum. Please note, this response is in regard only to the adequacy and accuracy of the Environmental Report and any comments we may have on the Proposed Plan itself will be provided separately.

As the plan is finalised, Perth and Kinross as Responsible Authority, will require to take account of the findings of the Environmental Report and of views expressed upon it during this consultation period. As soon as reasonably practical after the adoption of the plan, the Responsible Authority should publish a statement setting out how this has occurred. We normally expect this to be in the form of an "SEA Statement" similar to that advocated in the Scottish Government SEA templates and toolkit which is available at www.scotland.gov.uk/Publications/2006/09/13104943/13. A copy of the SEA statement should be sent to the Consultation Authorities via the Scottish Government SEA Gateway on publication.

Should you wish to discuss this consultation response, please do not hesitate to contact me on [REDACTED] or via our SEA Gateway at [REDACTED]

Yours sincerely

Dr Sofia Billett
Senior Planning Officer (SEA)
Planning Service – Edinburgh



Chairman
David Sigsworth
Chief Executive
James Curran

Edinburgh Office
Clearwater House, Heriot Watt Research Park
Avenue North, Riccarton, Edinburgh EH14 4AP

Appendix 1: Comments on the Environmental Report

General comments

1. We welcome the preparation of Addendum No. 2 detailing the assessment of the Proposed Plan's policies and the mitigation and enhancement measures required for individual sites proposals taken forward in the Proposed Plan. We also note that through the preparation of the Addendum the opportunity was taken in some instances to update baseline and other information.
2. We generally agree with the assessment findings of the policy assessment and provide some comments below in relation to the assessment outcomes and additional mitigation and enhancement measures. We also provide comments on the potential significant environmental effects of individual sites that make up the Spatial Strategy and advice on additional mitigation and enhancement measures for site proposals, including sites where we recommend avoidance of significant effects as the primary mitigation measure.
3. We welcome that the Environmental Report describes clearly the mitigation/enhancement measures that have been identified as a result of the assessment for the site allocations. We note that some of these measures have been taken forward as developer requirements in the Proposed Plan and we welcome this approach. This is an effective way to ensure that the detailed mitigation measures proposed are delivered through the implementation of the plan. However, some of the measures identified through the SEA refer to generic mitigation approaches and do not take into account specific site issues of importance. In addition, there are some inconsistencies between the measures proposed in the SEA and the developer requirements identified in the Proposed Plan. We provide some examples below along with the recommendation that such measures are taken forward in the final Plan.

Detailed comments

3. Effects of the Spatial Strategy

4. The Spatial Strategy was assessed at a settlement level through strategic cumulative sensitivity mapping. A settlement assessment summary was also provided with the first Environmental Report - Appendix C, based on the individual site assessments. The summary impact identified through the SEA for the individual sites and proposed mitigation and enhancement measures are provided in table C.1 (Appendix C of the Addendum 2).
5. **Perth Housing Market Area** - We consider that significant environmental effects are likely from the development proposed for Clathymore (H19). The cumulative sensitivity assessment identifies no constraints at this site.
6. The individual site assessment for allocation H19 recognises the complex issues affecting drainage solutions for this site, where further development could cause pollution to the adjacent water course and ultimately downstream to the WFD water body (Tributary of East Pow). Mitigation measures proposed for this site refer to general measures such as "drainage impact assessment including hydrology study where development has the potential to adversely affect natural hydrology systems and water resources". We consider that the development proposed for allocation H19 is likely to result in significant adverse effects on the water environment and recommend that further site specific mitigation measures are considered. These recommendations are detailed in our response to the Proposed Plan itself and these measures are likely to result in changes to the developable area.

7. **Highland Housing Market Area** - We consider that significant environmental effects are likely from allocations E11 - Ballinluig and H44 - Murthly. The cumulative site assessment shows that site E11 has one strategic constraint (therefore it is shown in green) and the Strategic Sensitivities map shows that the site is within 1:200 year indicative flood constraint. The Strategic Sensitivities mapping shows site H44 with no sensitivities present.
8. The individual site assessment recognises that the whole of site E11 is within the 1:200 year flood risk area. Review of the Indicative River and Coastal Flood Map (Scotland) shows that the entire site boundary of E11 lies within the estimated 1 in 200 year functional floodplain. Flood risk could be further exacerbated as there is a small watercourse which flows along the north western boundary. This unnamed watercourse has a catchment less than 3km² and as a result the potential flood risk from this watercourse has not been incorporated within the Indicative River and Coastal Flood Map (Scotland) due to its catchment size. We are also aware of further evidence showing that the site is at a very high risk of flooding and is likely to be subjected to flooding from flood events with return periods of greater than 1 in 15 years. A Flood Risk Assessment (FRA) is proposed as a mitigation measure however the findings of the FRA are likely to show that mitigation against flood risk at this site will not be feasible. We consider that the significant effects on flooding at this allocation should be avoided, as other forms of mitigation are unlikely to address the risk. Please refer to our response to the Proposed Plan where we recommend that the above allocation is not included in the final plan and where we provide a detailed report on flood risk for this site.
9. The cumulative site assessment and the Strategic Sensitivities map show that site H44 has no strategic constraints/sensitivities present and review of the Indicative River and Coastal Flood Map (Scotland) shows that the site lies outwith the flood risk envelope. However, we have photographic evidence of the site H44 being affected by surface runoff and additional information that shows the area has been subject to widespread surface water flooding. We consider that development at this site will be constrained and in order to ensure there is no increase in flood risk to nearby properties, we recommend avoidance is taken forward as the preferred mitigation measure. Please refer to our response to the Proposed Plan where we provide further advice and a detailed report on flood risk for this site.
10. **Kinross-shire Housing Market Area** – We consider that significant effects on flood risk are likely from sites Op13 - Kinross, Op17 - and Op 18 – Milnathort and significant environmental effects on the water environment are likely from H51- Balado. We also consider that there may be significant environmental effects on the water environment from the scale of development proposed for Kinross & Milnathort.
11. The cumulative site assessment shows that site Op13 has one strategic constraint (shown in green) and the Strategic Sensitivities map shows that the site is within 1:200 year indicative flood constraint. This also appears to be the case for sites Op17 and 18.
12. The entire site boundary of Op13 lies within the estimated 1 in 200 year functional floodplain of the South Queich. Additional modelling has shown the majority of the site to be at risk from the 1:200 year flood event. In addition, the 1:200 plus climate change event shows the entire site to be within this flood extent. The individual site assessment highlights that the site is within the 1:200 year fluvial flood risk areas and recommends a detailed FRA at planning application stage to define the area at risk and appropriate detailed design layout and levels as a mitigation measure. However we consider that development at this site for a more sensitive use (housing) is likely to result in significant environmental effects and recommend avoidance is taken forward as the preferred mitigation measure. Please

refer to our response to the Proposed Plan where we provide further advice and a detailed report on flood risk for this site.

13. The entire site boundaries of Op17 and Op18 lie within the estimated 1 in 200 year functional floodplain of the Fochy/Back Burn. The area is also prone to surface water flooding. We note that site Op17 at Milnathort has extant planning permission and has therefore not been included in the assessment. However, it is stated in table C.8 that there is a current application for renewal of that consent and therefore there may be an opportunity to consider addressing the likely significant environmental effects on flood risk and we recommend avoidance is taken forward as the preferred mitigation measure.
14. The individual site assessment for Op18 highlights that part of the site is within the 1:200 year fluvial flood risk area and proposes a FRA as mitigation measure to define the area at risk and appropriate detailed design layout levels. We consider that development at this site for a more sensitive use (housing) is likely to result in significant environmental effects and recommend avoidance is taken forward as the preferred mitigation measure. Please refer to our response to the Proposed Plan where we provide further advice and a detailed report on flood risk for this site.
15. We consider that significant environmental effects are likely from the development proposed for Balado (H51). It is not clear if the cumulative sensitivity assessment identifies constraints at this site. The site is located in an area that has no public sewerage infrastructure and that is under existing pollution pressure from private sewerage discharges. It is also located within the Loch Leven catchment. The receiving watercourse (South Queich) has limited capacity to dilute discharges and therefore development at this site is likely to cause deterioration in status of the water environment. We consider the development at this site is likely to lead to significant environmental effects on the water environment and that the best approach to mitigating effects at this site is avoidance.
16. We consider that there may be significant environmental effects on the water environment from the scale of development proposed for Kinross & Milnathort. The detailed site assessment identifies that sites are within the Loch Leven Catchment Management area and general mitigation measures are proposed in relation to drainage impact assessment. However, the site allocations proposed for Kinross & Milnathort are likely to exceed the existing capacity of the waste water treatment works and it may not be feasible to upgrade the works due to the significant constraints on discharges to Loch Leven. Therefore you may wish to consider further mitigation measures to address these effects. Please refer to our response to the Proposed Plan for further details on the information we hold regarding sewerage constraints within the Loch Leven catchment area.

4. Policy Assessment

17. We welcome the detailed summary of the findings of the analysis of the plan's policies. We generally agree with the assessment findings but provide some additional comments in relation to mitigation and enhancement measures that you may wish to consider which would afford the level of mitigation required to avoid significant environmental effects and further strengthen the proposed policies.
18. **Policy ED1: Employment and mixed use areas** – We note that the assessment of this policy predicts neutral effects on the SEA topic waste. We consider that the effects of this policy in relation to waste could be enhanced through identifying employment sites as sites appropriate for waste management facilities. This enhancement measure would also be

relevant to Policy EP9B. We suggest alternative policy wording in our response to the Proposed Plan.

19. **Policy NE4: Green Infrastructure** – We note that the assessment of this policy predicts significant positive effects on the SEA topic water as a result of the commitment to the “protection, enhancement and management of watercourses, floodplains and wetlands which are important contributors to the network of blue and green corridors for the alleviation of flood risk, wildlife, recreation and the amenity needs of the community” and we agree with this assessment. Positive effects on the water environment could be further enhanced if a reference is included to all surface water bodies (rather than just watercourses), as this includes watercourses, lochs, transitional waters and all surface water features. We suggest alternative policy wording in our response to the Proposed Plan.
20. **Policy EP6: Lunan Valley Catchment Area** – We note that the assessment of this policy predicts significant positive effects on the SEA topic water. However, it is not clear how the policy specifically ensures the protection and enhancement of water body status. The policy states “developments necessary for economic need which the developer can demonstrate will have no adverse impact on the environmental assets of the area”. You may wish to include a specific reference to the protection of the water environment particularly in relation to increasing phosphorous discharges into the catchment as a mitigation measure. We suggest alternative policy wording in our response to the Proposed Plan.
21. **Policy EP7B: Drainage within the Loch Leven Catchment Area** – Please note that this aspect of the policy could potentially result in adverse effects on the water environment as it allows individual / private waste water drainage arrangements and the fragmentation of the strategic public network of collecting systems. The provision of a solution to waste water drainage that is not sustainable long term could have adverse effects in relation to the efforts to improving and maintaining a good quality water environment. You may wish to consider further mitigation measures to address these effects and we suggest alternative policy wording in our response to the Proposed Plan.

5. Mitigation and Enhancement

22. We note that the primary mitigation measure in the LDP will be the application of the relevant policies across the whole plan to all development proposals. We provided some additional comments above regarding some of the environmental effects of the policies and how they could be strengthened to afford the level of mitigation required to avoid significant environmental effects. We have also provided comments in relation to the sites where avoidance is recommended as the primary mitigation measure since other mitigation measures, including the Proposed Plan's policies, will not adequately address the significant environmental effects.
23. As part of the assessment process, site specific mitigation measures have been identified that may be applied to offset significant adverse effects on the environment resulting from the implementation of the plan. We note that some of the mitigation measures have been taken forward as developer requirements in the Proposed Plan and we welcome this approach. This is an effective way to ensure that the detailed mitigation measures proposed are delivered through the implementation of the plan.
24. We welcome the preparation of Appendix C which details mitigation and enhancement measures proposed for each of the sites allocated in the Proposed Plan. As stated above

we welcome that some of the detailed mitigation measures identified through the SEA have been taken forward into the Proposed Plan, however this has not been done consistently for all sites and examples are provided below:

- a. some of the mitigation measures in the SEA refer to the need for a FRA to be undertaken to inform the development and this has not been included in the developer requirements in the Proposed Plan for the following sites: MU5, H64, Op15, H15, Op8, H38, H54, H30;
- b. for sites E1 and E3, the SEA identifies that the sites are within the 1:200 year flood extent but no mitigation measures are proposed;

25. There are a number of sites where an FRA is required as mitigation measure and this has not been identified in the SEA mitigation table or the Proposed Plan: H9, E26, E12, E13, H21, H22, H3, E1, Op2, Op7, E3, E38. Please also refer to our response to the Proposed Plan for further details on allocations which may be constrained due to flood risk and where we recommend specific mitigation measures to avoid potential significant adverse effects in relation to flooding. At these sites we anticipate that it may be possible to mitigate flood risk by adequate design and layout i.e. reducing the size of the site and to limit development to certain areas and further studies will be required to inform this. For these allocations it is generally appropriate to refer to a FRA as a measure to ensure potential significant environmental effects on flooding are adequately mitigated.
26. There are also a number of allocations that as a result of the plan making process have had their boundaries changed or where these boundaries are now more accurate. For these allocations we may have previously requested a FRA as a mitigation measure. However, due to the change in boundary we no longer require these mitigation measures. The sites that according to the information we hold no longer require a FRA but this is identified in the SEA mitigation table are: E29; H62. Our detailed comments submitted with the Proposed Plan have been altered to reflect the change in boundary for these sites.
27. We have concerns with the approach used in Appendix C with regards to using the Indicative River and Coastal Flood Map (Scotland) for calculating the area at risk of flooding. The Indicative River and Coastal Flood Map (Scotland) is not accurate enough to determine developable areas, these can only be determined through an appropriate FRA and we are concerned that future developers may misinterpret the information provided in Appendix C. We note that a caveat has been attached in paragraph C.2 however we would recommend that in the future any flood risk commentary does not refer to calculated areas but rather highlights that part of the site is shown to be at risk of flooding on the flood map and therefore a FRA would be required to accurately establish the developable area.
28. Development can also bring positive impacts to the water environment through addressing physical changes which are causing a deterioration to the water environment e.g. culverts, bank reinforcement or barriers to fish passage. We note that for allocation MU5 the SEA has identified that there may be a culvert under the site. There is therefore an opportunity to open and restore the existing culvert and this enhancement measure could be taken forward through the developer requirements in the Proposed Plan. At allocations E13, H9, H64 and Op7 opportunities for enhancement of the water environment, through watercourse restoration, could be identified through the SEA mitigation/enhancement measures and taken forward in the Proposed Plan. Please refer to our response to the proposed plan for further information on watercourse restoration measures.
29. Please note that site H47 – Kinross may have been omitted from Appendix C.

6. Monitoring

30. We note that that a comprehensive framework for monitoring the environmental effects from the plan and assess the effectiveness of the mitigation and enhancement measures has been developed. We welcome the proposals for using monitoring indicators that maximise opportunities to build on existing monitoring frameworks. There may also be opportunities to integrate the SEA and Plan's monitoring frameworks to ensure a more proportionate approach and avoid duplication.
31. The chosen indicators may need to be further targeted to monitor the potential environmental effects likely to result from the plan and as far as possible establish a clear link between implementation of the plan and the identified effects to the environment.
32. For example, it may be more appropriate for the indicator related to flooding to measure the area of development within the 1:200 year flood area, rather than the area of land in P&K within this flood envelope. Similarly, the indicator for soil "percentage area of potentially contaminated land" may change as a result of the Local Authority contaminated land inspection regime and it may therefore be more useful to measure the area of potential contaminated land remediated through the planning system as a result of the LDP.
33. You may wish to update the monitoring indicator for waste to reflect the current requirement of the Zero Waste Plan that Local Authorities plan for all waste (rather than only monitoring Municipal Solid Waste). SEPA's National Capacity Database and waste returns could be used to monitor the amount of waste treated within Perth and Kinross Council area. This database is updated annually (in arrears) and provides information on all waste management facilities accepting and treating all types of waste in each year.

From: Joe Kennedy [REDACTED]
Sent: 10 May 2012 18:43
To: Ala sdair Finlayson
Cc: [REDACTED]
Subject: Land at Crook of Devon (opposite filling station) & Land known as Crook Moss
Follow Up Flag: Follow up
Flag Status: Green
Attachments: harelaw farm 001.jpg

Dear Alasdair

Please find attached the required location plan for the above.

Grids two and three, which run parallel with the A977, is the area for proposed housing development.

Grids four and five are the area known as Crook Moss and comprises of twelve hectares.

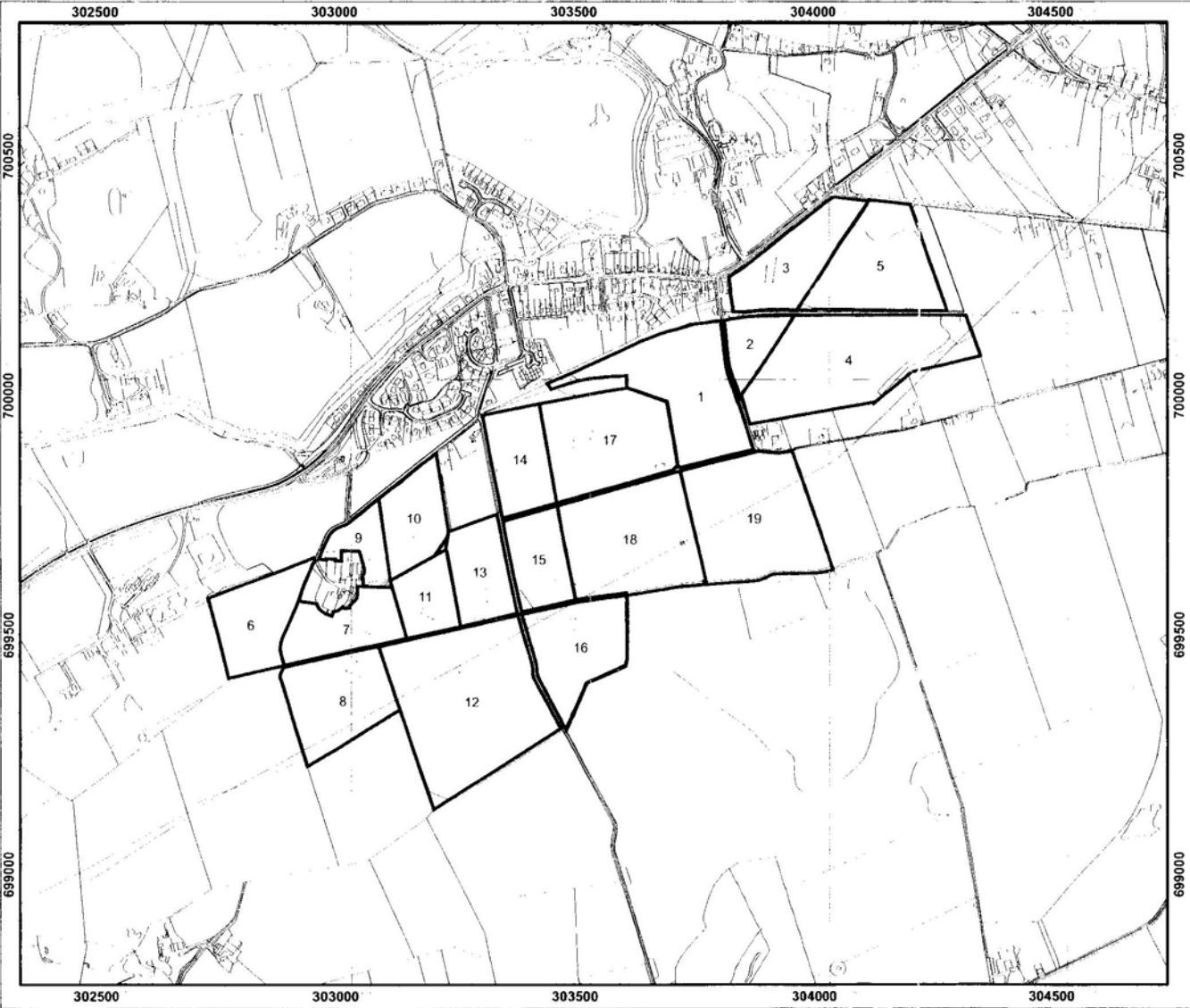
I trust this information is of some assistance meantime.

Please contact me should further relevant details be required.

Joe

----- Forwarded Message -----

From: John Broadfoot [REDACTED]
To: [REDACTED]
Sent: Thursday, 10 May 2012, 15:53
Subject: HARELAW MAP



Rural Payments and Inspections Directorate



Farm Code 486/0051

Map 1 of 1

Field System Version Date : 29 April 2009

© Crown Copyright

Counter	Field Identifier	Area(Ha)
1	NO/03696/00012	5.33
2	NO/03837/00074	1.28
3	NO/03931/00248	3.26
4	NO/04064/00037	7.28
5	NO/04104/00233	4.52
6	NT/02804/99493	3.02
7	NT/02980/99478	2.61
8	NT/02983/99330	3.82
9	NT/03017/99662	1.33
10	NT/03137/99705	2.44
11	NT/03155/99537	1.75
12	NT/03246/99319	9.01
13	NT/03270/99594	2.43
14	NT/03348/99836	2.58
15	NT/03396/99618	2.3
16	NT/03467/99445	3.67
17	NT/03536/99865	5.04
18	NT/03589/99665	6.03
19	NT/03845/99720	6.42

Total Area: 74.12 Ha

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Based on OS 1 and 2 Data

Version No 2.1



Scale 1:10,000

1 cm equals 100 Metres
1 cm equals 109 Yards
1 inch equals 278 Yards



From: TES Development Plan - Generic Email Account
Sent: 01 May 2012 13:17
To: [REDACTED]
Subject: FW: Proposed Local Development Plan: Land at Crook of Devon

Dear Harry Aird

Perth & Kinross Council
Proposed Local Development Plan: Period of Representation
Land at Crook of Devon (opposite filling station)

I noticed that I had not heard back from you and wondered if you would like to send us a bit more information (please see the bullet points at the beginning of my e-mail below for what we need – in particular which housing site are you referring to? And where is the Crook Moss land?) If we do not hear from you then I won't take the matter any further.

Kind regards

Alasdair Finlayson
Planning Officer: Planning & Regeneration
Perth & Kinross Council, The Environment Service, Pullar House, 35 Kinnoull Street, Perth, PH1 5GD

From: TES Development Plan - Generic Email Account
Sent: 20 March 2012 17:23
To: [REDACTED]
Subject: Proposed Local Development Plan: Land at Crook of Devon

Dear Harry Aird

Perth & Kinross Council
Proposed Local Development Plan: Period of Representation
Land at Crook of Devon (opposite filling station)

I refer to your letter relating to the Proposed Plan which cannot be accepted as a formal Representation. This letter explains why and what your representations should contain.

- **I understand that you wish the plan changed to show a housing site you propose in Crook of Devon**
- **please could you send us a plan that shows the site to which your representation refers?**

The Council have published the Proposed Plan for a period of Representation from the 30th January until 4pm on the 10th of April 2012. The Proposed Plan sets out the Councils settled view on which land should be allocated to meet the areas development needs to 2024. The Proposed Plan is not a planning application but identifies areas of land and sets out the indicative land uses which would be considered acceptable in these areas. It does not set out the detailed layouts for these areas of land as this will be considered through a detailed planning application at a later date and will be subject to a further period of representation.

The period of representation on the Proposed Plan allows any party who do not agree with the content of the Plan to have the opportunity to make their case as to why they would wish to see the Plan changed - or if they agree why they do not wish to see the Plan change. All representations will be submitted to Scottish Ministers who will determine whether any changes to the Plan are required.

You may view the Plan and make a Representation online at www.pkc.gov.uk/ProposedLDP, or alternatively you may submit your representation by email, and where email is unavailable, by post; Contact Details can be found at the head of this letter.

Please note that all representations must include the following:

- Name and contact details
- What document you are commenting on
- What section, site or policy your comment relates to
- Tell us what, if anything, you want to change in the Plan
- Give your reason for either supporting the Plan or making your change to the Plan
- Questions should not be included in Representations but if clarification is required on any aspect of the Plan please contact the Local Development Plan team.

Yours sincerely

Alasdair Finlayson

Planning Officer: Planning & Regeneration

Perth & Kinross Council, The Environment Service, Pullar House, 35 Kinnoull Street, Perth, PH1 5GD

From: Joe Kennedy [REDACTED]
Sent: 20 March 2012 12:03
To: Peter Marshall
Cc: Councillor William Robertson
Subject: Fw: Foward Planning Unit, Perth & Kinross Council

----- Forwarded Message -----

From: Joe Kennedy [REDACTED]
Sent: Friday, 16 March 2012, 15:29
Subject: Foward Planning Unit, Perth & Kinross Council

Mr Harry Aird
Harelaw
Crook of Devon
KY13 0PS

Land Located Eastside of Crook of Devon Village, Opposite filling Station

The above mentioned land was submitted to the Council as a proposal for futuristic development however, I believe the proposal was rejected.

I would like this site to be reconsidered for the following reasons:-

The Crook of Devon needs expansion to accommodate both young and elderly. Furthermore there have been accidents on the road that passes through the village, in particular the stretch of road leading towards Drum Village. Having had discussions with fellow residents concerning road safety matters we are convinced a round about could act as traffic calming hence alleviate speed and improve road safety, obviously the Council's roads engineers would decide.

Should consideration be given to any housing development I am willing to donate any land necessary to assist in any traffic management improvements. Any road management measures could

be financed by development.

Furthermore I am willing to donate an area of land known as The Crook Moss for the benefit of the community, the area in question is twenty eight acres in total.

I would welcome an opportunity to discuss my proposals and would suggest an on site meeting with the relevant officials of the Council.

I welcome any further dialogue on this matter.

From: GRAEME FITZGERALD [REDACTED]
Sent: 05 April 2012 20:25
To: TES Development Plan - Generic Email Account
Subject: local development plan
Follow Up Flag: Follow up
Flag Status: Green

Dear sirs I represent Ian Redford Ltd at the grange where the former chicken sheds are. In your proposals you list the site for residential and small business use, if they could be combined. On the north side of the railway there is an area you have in as residential. I would like to raise some points about this area, greenfield site, next to railway, risk of water damage, road not wide enough [last developers nearby did nothing to upgrade road] an old orchard which people in the care of Gowrie are trying to regenerate drainage issues, no mention of employment or small business use. Our site is brown field, and during the war housed many of our servicemen.

Graeme Fitzgerald

Learig

Errol station

Perth.

PH2 7SN [REDACTED] [REDACTED]

JIM FARQUHARSON

7th April, 2012

Brenda C Murray

Team Leader

Local Development Plan Team

Perth & Kinross Council

Pullar House

35 Kinnoull Street

Perth, PH1 5GD

RECEIVED

10 APR 2012

Dear Ms Murray

Tayplan/Perth City

Provost John Hulbert stated, recently, in the press that **PERTH CITY STATUS** will now require the **TAYPLAN** and consequently **THE LOCAL STRUCTURE PLAN** to be reassessed and rewritten.

Does this indicate and establish that the Carse of Gowrie will now have to assume a bigger and more positive role in the economic future of Perthshire without interference from Dundee?

The Carse of Gowrie, if positively assessed and developed has the potential to:

- a. Provide education facilities (Primary & Secondary)
- b. Provide a Rail Park and Ride (reducing emissions from traffic, closing level crossings and opening up the lower Carse).
- c. Increase employment opportunities

HORN FARM, ERROL, PERTHSHIRE, PH2 7RS



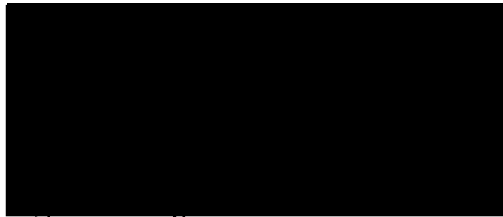
JIM FARQUHARSON

(Tourism, distribution, food production and processing as well as expansion of the existing activities).

- d. Save future pressure on conservation villages (Longforgan/Inchtute/Errol etc) lacking in fundamental infrastructure (Schools/shops/leisure facilities/roads and utilities) and therefore inhibit future economic growth or sacrifice their conservation and historical appeal and identity.

It was blatantly obvious that ***NO VIEWING OF THE LOCAL DEVELOPMENT PLAN*** having been provided in the Carse indicated to us that no consideration was being mooted or considered for what must be the outstanding location to provided sustainable economic development to benefit the whole of the Perth Area.

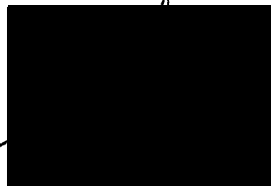
Yours sincerely



James W Farquharson

PS The Carse never floods.

Land available for use if Grade 3(2) not Grades 1 & 2
as identified elsewhere



HORN FARM, ERROL, PERTSHIRE, PH2 7RS



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

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 10th 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	Kathleen Baird
Address and Postcode	Easter Clunie Newburgh Fife Ky146EJ
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 West Kinross	or			
Chapter	7.2.2	Page no.	205	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.

I would like to see H46 removed from this plan

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

As a local elected member I have listened to local residents and many have expressed grave concerns about this proposal.

Road Safety

Loss of amenity.

1 Road Safety Issues , Springfield Road is a very busy road both for cars and pedestrians , this proposed development would increase the volume of traffic. Crossing Springfield Road is hazardous at the moment. Many pedestrians use this route to access both Primary and Secondary School and the Sainsbury's store . There is the potential risk of additional traffic using Sutherland Drive for quick access into this new development.

Traffic management is a major concern.

Developer proposes to " upgrade the existing access road to Davies Park " this proposal causes real concern,this access is not a road. Davies Park is the only green space in this part of the town and residents do not want anything to spoil this much used local amenity. This park is a leisure area for this part of town,providing a safe place for all with access to the path which is well used.

Access to this site is a concern to many of the residents. Residents not convinced by developers proposal.

Visual Impact

This proposed development would be seen clearly from the motorway , the existing open views are important to the residents and visitors to the Town . Present residents would like to see this area transformed into a Community Woodland which would provide a barrier to motorway pollution and noise.

Kinross does require additional housing but not on this site.

I support the residents who are opposed to any housing on this site , there are other sites much more suitable.

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

Save a copy

Print

Submit

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

9th April 2012

Mr Peter Marshall,
 Planning & Sustainable Development Manager,
 The Environment Service (Planning),
 Perth & Kinross Council,
 Pullar House,
 35 Kinnoull Street,
 PERTH,
 PH1 5GD.

RECEIVED

10 APR 2012

Dear Peter,

PERTH & KINROSS (PKC) PROPOSED LOCAL DEVELOPMENT PLAN (LDP) (JANUARY 2012)

I write in formal submission to the above document (although I will also be e-mailing copy to you by the deadline of 10th April 2012). My response has to be seen also in the context of my formal submission to your Main Issues Report (MIR) on 10th February 2011 (Enc 1). Since the publication of the Proposed LDP (covering the period to 2024) I have held six well attended public meetings in Kinross-shire (Enc 4). I also referred at these meetings to my letter (Enc 2) of 1st August 2011 to Pam Ewan on the Tayplan Proposed Strategic Development Plan (2012-2032) because of its necessary consistent relationship to PKC's LDP. There are 24 unresolved issues at Minister's examination stage, 5 of which are outstanding from me. The other local elected members for Kinross-shire attended some of these meetings.

Following these meetings (involving significant presentations - Enc 5&6) I feel well placed to respond to the LDP as the elected member for Kinross-shire since May 1999, a constituency whose broad views, particularly from the rural areas, I have always sort to represent to PKC. Whilst clearly not agreeing with all responses to the LDP, I would endorse the submissions of Cleish, Fossoway & Portmoak Community Councils, (C.C.'s) Friends of Rural Kinross-shire (FORK) and Kinross-shire Civic Trust (KCT). You should also note that the Fossoway Community Strategy Group (SG) met on 29th March 2012 to discuss the LDP and I enclose brief notes from that meeting (Enc 3).

CHAPTER 2: VISION AND OBJECTIVES

In earlier submissions of 'generic comment on policy' I had felt that the MIR should state 'at the outset' **2 significant core values**, namely that any development framework should '**protect & enhance the amenity of existing residents and protect prime agricultural land and our scenic landscape against inappropriate development.**' I wished to see the retention of AGLV's, called for PKC to recognise the need for major mitigation measures on the A977 (following the failed petition to the Scottish Parliament) and noted from the Kinross Community Council questionnaire a significant level of support for the restoration of a rail link through Kinross-shire. **"It is hugely disappointing that only the protection and enhancement of existing residential amenity under policy RD1 adequately responds to my generic comments within this LDP".**

In response to paragraphs 4.4 to 4.8, I remain opposed to the level of growth that is used to base the plan and reiterate earlier comment on Page 2 of my MIR (Enc 1). The Single Outcome Agreement (SOA) encapsulates the administration's vision for the future and is predicated on being pro-active within the growth agenda in order to achieve the concept of a Greater Perth and city status. We have now got this city status confirmed so why do we still need such a growth level?

CHAPTER 3 POLICIES I wish to comment on some of these, viz:

ED3 SUPPORT

ED4 "

RD2 Particularly relevant to Perth City Centre! A welcome inclusion.

RD3 Presume based upon our unanimously approved 2009 Policy that I suggest should be 'fit for purpose'. I strongly reiterate KCT comments and need for clarity on what constitutes 'a building group'? **The new policy must be robust in light of the potential removal of 12 settlement maps from Kinross-shire.**

RD4 SUPPORT

RD5 Although I understand the need for new sites subject to 6 criteria, **I am very wary of how this policy will be used by the agents for gypsy/travellers sites to support what is usually retrospective planning applications that result in sites becoming established and proliferating, without adequate planning control.** In Kinross-shire we currently have a retrospective application on the edge of the settlement boundary (current & proposed) for Crook of Devon, a large number of travellers at Gairneybridge Caravan Site (locus of a planning application that seems to have been 'pending' indefinitely) and a Greenacres Site with a welcome but generous settlement boundary (apparently being extended further since the LDP was published, before any landscape framework has been implemented).

RD6 SUPPORT

TA1 The Plan completely fails to mention Kinross-shire under Transport & Accessibility. **Both the MIR & LDP are deficient in making no mention of the A977 or the protection of the railway line south of Kinross (Policy 46 of our Current Local Plan)** See my earlier submissions, particularly my letter of 30th June 2009 Page 6 (A977 mitigation measures) that has been completely ignored (Enc 1b).

CF1A I am concerned that development proposals for playing fields could be permitted on sites that are deemed surplus to requirements through a future and imminent playing field strategy; if a community have worked hard to provide a local facility it should not be lost to them because there is provision outwith that community within a county wide strategy, **I would cite the need to protect, for example, Davis Park, Kinross and Waulkmill Park, Crook of Devon.**

HE3 Covers existing conservation areas but the LDP contains no proposals for new ones in Kinross-shire. This is disappointing given my final comment on these in my MIR (Enc 1) (page 11).

HE4 SUPPORT

NE1B &

NE6 New sites of Special Scientific Interest are difficult to promote, according to SNH, **but both the Crook Moss (a lowland bog area that is slowly re-forested) and Perth Lade should be considered for such status.**

NE3 SUPPORT

NE5 In my MIR (Enc 1) I wanted the green belt inner boundary to be much more tightly drawn to the outer ring road and the A9 west & north. The inclusion of Housing Site Proposals at H7 Berthapark & H70 Perth West now preclude this!

ER1 I note that a spatial framework for wind energy developments is to be published later. Please note my answer to Q19 in MIR (Enc 1) Page 5. **I don't see any urgency being displayed in a definite deficiency in policy.** In a letter of 18/1/12 to Clackmannan & PKC (Enc 7), I called for a moratorium on further windfarm cluster developments in the Ochils.

ER2 is welcome and particularly relevant to Blairingone & Crook of Devon in Kinross-shire.

ER5 is not robust enough, such land should not be compromised by any development. See my Tayplan (Enc 2) on Policy 3 and my answer to Q4 in MIR (Enc 1) Page 3.

ER6 Policy only mentions National Scenic Areas for safeguarding against development. **I am dismayed that the AGLV's that were extended to Kinross-shire's hill and river borders following the 2004 Plan Inquiry are to be lost from the LDP and that no discussions have taken place into what can replace them, with guidance to be published later.** The Plan should state that AGLV's continue until landscape protection that replaces them has been finalised, which hopefully will include a regional park for the Ochil Hills.

EP2 SUPPORT

EP3D Should support localised ditch and watercourse management schemes where no flood prevention scheme is in place. See my answer to Q20 in MIR (Enc 1) Pages 5/6.

EP7 SUPPORT

EP9 SUPPORT

EP13 AIRFIELD SAFEGUARDING – A new policy covering the whole of PKC that I had called for is welcome and I note the intention to use Civil Aviation Authority national guidelines with the ringed consultation zones. I also welcome the need for independent assessment of applications for planning within such zones. **I note the importance of good neighbourliness but this must work both ways, residents need reassurance that their amenity will not be compromised by airfield operations not following good practice and adhering to the conditions in airfield planning approvals. I have received representation over microlight operations in the Balado & Kinross areas.**

I NOTE THERE ARE 53 POLICIES IN THE LDP, a reduction for the whole PKC area of almost 50% from the current Kinross-shire Local Plan. This LDP is a huge document to absorb and I am not convinced that retention of a Kinross-shire Local Plan that I and colleagues argued for would not have been a better and more comprehensive approach.

CHAPTER 4 PKC SPATIAL STRATEGY

I agree the Tayplan Spatial Strategy and hierarchical approach in Para 2.1. In response to Para 3.8 & 3.9 please see my answers to Q1 & Q2 in MIR (Enc 1) Page 3. **I am very pleased that you have resisted calls from the development sector to oppose re-allocation of the 10% housing requirement from Kinross-shire to Perthshire.**

Para 3.13 and the **Proposed Housing Density Ranges are vigorously opposed by me.** See my answer to Q4 in MIR (Enc 1) Page 3. My comment re Policy ER5 is also relevant here. **It is irrefutably the case that accepting the unsustainable level of growth in PKC's SOA forces us to make choices between increasing housing density and the irrevocable loss of prime agricultural land as a resource, contrary to national planning policy.**

CHAPTER 5 PERTH AREA SPATIAL STRATEGY

GLENFARG is within my Kinross-shire Ward Area and I would suggest, now that the Secondary School catchment area serving Arngask Primary School centres on Kinross High School from 2013, it should be part of the Kinross HMA. I understand that Glenfarg C.C. are in favour of the settlement map on Page 119, as am I.

CHAPTER 7 KINROSS-SHIRE AREA SPATIAL STRATEGY

I welcome your acceptance in 7.1 Introduction of the pressure Kinross-shire faces from the central belt of Scotland for housing and the high level of commuting outwith the area for work. **I believe you accept that the previous levels of growth the shire has experienced are not sustainable** and this is another reason, in addition to the environmental constraints of Lochleven, for justifying the 10% re-allocation of housing land requirement to Perthshire aforementioned.

Employment Land

You identify the need for 20 hectares of employment land to 2024 and then provide a table in Para 1.6 totalling 32 hectares, which I suggest is over-provision.

Housing

I was very critical in my MIR (Enc 1) Page 7 that work on the Fossoway Long-Term Development Strategy since 2004 by the community had not been mentioned but it has now belatedly been recognised in Para 1.12 and the findings have been used to inform the settlement strategies.

KINROSS & MILNATHORT

I, along with Local Councillors Baird & Robertson, remain opposed to Employment Site E17 at Turfhill, a much larger site than Site B of Map 38 in the MIR. **I believe this site will be the catalyst for the eventual coalescence of Kinross with Balado**, which I have always opposed as a likely precursor to the spread of Kinross west of the defensible barrier of the motorway. I note E36 includes the current PKC Environment/Roads depot and if it is to be removed from this locus, it is 'essential' a depot is retained within Kinross-shire for emergency flood equipment and winter gritting/ploughing plant. **The employment sites east of the motorway should be developed before any consideration of those west of the motorway, now the link road has been secured.** I note that Op 13 Motor Auctions site is for mixed employment and residential use but I agree with Kinross Community Council's decision at their meeting on 4th April 2012 that this site should be for Employment useage only.

I have noted significant opposition from residents, shared by Kinross C.C. neighbouring Housing Site H46 and concur with it; this area would be better left as community woodland and open space.

I also maintain my opposition to H47 at Lathro Farm, believing this housing site will contribute significantly to the creeping coalescence of Kinross & Milnathort that has been hastened by the relocation of PKC services within the Lochleven Campus from Kinross Town Centre.

Given my opposition to the above housing sites, it would seem that housing should regrettably be considered for Opportunity Sites 12 & 24, although the former should include a much needed car park for the town. I believe Op 10 Market Park site should remain green space.

I remain of the view that the LDP does not provide the necessary overall strategy for the rejuvenation of Kinross Town Centre. I am content that sites A, B & C from Map 31 of the MIR have not been brought forward to the LDP for Milnathort.

The above position on housing reduces the level of development in Kinross but is consistent with my opposition to the administration's slavish acceptance of dubious growth forecasts that take no account of the economic recession; **a lower and more sustainable growth plan more in line with PKC's old structure plan would be better environmentally for the town. More housing could follow if employment sites are taken up and dependence on commuting reduced.**

KINROSS-SHIRE LANDWARD AREA

I have to start by giving enormous credit to your department for being stringent in your assessment of appropriate housing sites for the landward area, when producing your MIR. There were 60 development sites put forward by that sector (Balado 8, Cleish & Blairadam 6, Fossoway 28, Gairneybridge & Hatchbank 10 & Portmoak 8) and widespread concern that **'there was far more land being offered for development than could ever be justified by a realistic assessment of need'**!

BALADO Map Page 212 SUPPORT

BLAIRINGONE Map Page 214 & Para 4.3 SUPPORT E22 but **oppose lack of a zoned housing site** which both myself, Fossoway C.C. and the SG think should have been Site B for 30 houses per Option 1 of the MIR. Conditions in Blairingone have not changed since the MIR was published inviting comment on housing site options put forward. Option 1 was the overwhelming choice of community representatives from the landward area and I fail to understand why the B1 assessment area of the SG's map is not zoned. **The only local service left in the village is the school and I have long campaigned for its retention and improvement, which such a site would assist, amongst other facilities. I am critical that Para 4.3 fails to mention the need for a by-pass for the village, referred to in Para 5.20 of our current local plan.**

CARNBO Map Page 215 SUPPORT. The apparently permanent builder's yard to the west of the village boundary should be returned to agricultural use as soon as the latest planning approval has been completed.

CLEISH Map Page 216 **I fail to see the reason for a divorced settlement boundary** and would refer you to Cleish C.C.'s submission on this settlement.

CROOK OF DEVON Map Page 218 **I am delighted that Option 2 of the MIR covering the Naemoor Road Site for 90 houses has not been brought forward following my discussions with you in October 2011 and the long campaign by the community over many years opposed to this development.** I understand there is a lot of local support for the Map you now propose.

DRUNZIE Map Page 219 SUPPORT**GLENLOMOND** Map Page 220 SUPPORT

GREENACRES Map Page 221 Paragraph 10. **I welcome the introduction of a settlement boundary here**, albeit more generous to the north and west than I would have proposed, following representations from myself and Cleish C.C. I refer to (Enc 8) my letter of 4th July 2011 to planning on this matter, Nick Brian in his reply of 25th July 2011 did not address my point regarding the potential of the site having been achieved in May 2006. I also refer to my earlier comment on policy RD5 regarding current activity here.

HATTONBURN Map Page 223 I agree with KCT and fail to see why the settlement boundary needs to cross the Hattonburn road.

KELTYBRIDGE & MARYBURGH Map Page 224. SUPPORT and welcome acknowledgement in Para 12.2 that Keltybridge should not be further expanded at this time. I note that the village setting area west of Tabernacle Hall has been removed from the boundary and would hope this will prevent housing development here. The community would still like this area to be used for car parking and visitor information on local footpaths etc. as I pointed out in my MIR (Enc 1) Page 9.

KINNESSWOOD Map Page 226 SUPPORT

OCHIL HILLS HOSPITAL Map Page 228 SUPPORT but aware of ongoing community concerns in relation to access and drainage, etc.

POWMILL Map Page 231 Site H53 **Both myself, Fossoway C.C. and SG feel that the site numbers should be reduced from 120 to 90** (23 already have planning permission on north side of A977) **reflecting Site B in MIR Option 2. We also cannot understand the divorce of settlement boundaries here and seek linkage of Gartwhinzean Loan to the main village as per SG's map.** An opportunity exists to improve footpath links from western end of Powmill to village centre and possibly provide a new large roundabout and new road junction to A823 on east side of site.

The SG's map excluded an area to the north east from the settlement boundary above Powmill Farm; this area has been the subject of several planning refusals and I would like it removed from the settlement boundary.

I note that Powmill already has an employment site E23 and question the need for business land in H53. It is also felt that the inclusion of a village green and sports area per the SG's map should be included in the LDP.

RUMBLING BRIDGE Map Page 233. I note that one of the tourist sites has been removed in this LDP, currently the subject of a proposed residential development by Thomson Homes. **I understand the initial proposal for 30 houses has been scaled back to fit within the proposed settlement boundary; (R5 Assessment Area of SG's map) I would not like to see it extended westwards at future date.** Both myself, Fossoway C.C. & SG consider that the R2 assessment area of the SG's map at Firgrove/Merryhills (current planning applications) should be included in the settlement boundary of the LDP, as in our current local plan.

SCOTLANDWELL Map Page 235 Site H54. Firstly, like Portmoak C.C. I don't understand or agree to a divorced settlement boundary between Kilmagadwood & Scotlandwell. I expressed concern in my MIR (Enc 1) about the potential for southern expansion of the settlement boundary; at my LDP presentation in Portmoak, the developers for H54 were arguing for a larger zoned area and reduced housing density, which has merit in enabling single-storey housing. However, I note that Portmoak C.C. have suggested that the 30 houses proposed could be accommodated within the current local plan boundary, without the need for H54. **If this could be done, I would favour this approach.** I note that H15 of current plan has not been fully developed and H17 at Wellside is currently under construction. An open space corridor between Leslie Road and the southern settlement boundary must be retained.

WESTER BALGEDIE Map Page 237 SUPPORT

FINALLY, as noted in my comment on Policy RD3, the settlement boundaries in our current local plan at Balado Crossroads, Blairforge, Craigowmill, Cuthill Towers, Easter Balgedie, Gairney Bank, Gairneybridge/Fruix, Lochran Sidings, Mawcarse, Middleton, Netherton & Upper Tillyrie have been removed. Nine of these settlements are within the Lochleven Catchment area and in my MIR (Enc 1) answer to Q7 Page 4, I noted that settlements with less than 20 houses, except within the catchment, may lose their boundaries. I suggest small communities want some certainty as to the parameters of their settlements and I am concerned on the potential for creeping ribbon and unauthorised development in the countryside on the edge of settlements, unless Policy RD3 is robust and enforced. **I can see no justification in this context for removing the settlement boundaries within the catchment, especially that for Easter Balgedie and the larger community at Gairney Bank.**

APPENDIX 1 SUPPLEMENTARY GUIDANCE

I have already commented on Policies RD3 & RD4 but note Policy Guidance on Developer Contributions December 2011 incorporating Primary Education. In this context please note my e-mail to yourselves in July 2011 viz:

"I have noted that under the Planning Guidance Note of May 2009 (Primary Education & New Housing Development) any property of more than one bedroom, unless classed as affordable or sheltered housing, is subject to a significant developer contribution where the primary school catchment is at 80% capacity threshold. **Whilst I am content for this to apply to developers, I am unhappy it applies for conditioned housing for essential workers in agriculture, etc. I think in these circumstances it is a draconian levy and I seek to ensure that the new guidance excludes same.**"

In conclusion, I apologise for the length of this submission and fully expect you to take account of my comments written from my experience as a former Convenor of the Environment Service & Vice Convenor of Development Control. I commend this submission to you.

Yours sincerely,

Councillor Mike Barnacle
Independent Member for Kinross-shire

P.S. Please let me know if you require clarity on any points or any background correspondence.

Circulation List

Cleish & Blairadam, Fossoway, Kinross & Portmoak Community Councils, FORK & KCT

Enclosures (Enc)

- (1) Councillor Mike Barnacle's (MB's) final submission of 10/2/11 on MIR for the new LDP.
- (1b) Extract from Mb's letter of 30/6/09 to Brenda Murray @ PKC re A977 Mitigation Measures.
- (2) MB's letter of 1/8/11 to Pam Ewan on Tayplan Proposal Strategic Development Plan to 2032.
- (3) Notes of SG Meeting 29/3/12.
- (4) Kinross Community Council Newsletter March 2012 News & Articles – Notice of Public Meetings.
- (5) MB's letter to Fossoway Residents February 2012.
- (6) MB's letter to residents of Balado, Gairneybridge, etc., March 2012.
- (7) MB's letter of 18/1/12 to Nick Brian @ PKC on Windfarm Developments in Ochil Hills.
- (8) MB's letter of 4/7/11 to Nick Brian @ PKC on Greenacres Travelling People's Site, Blairadam

From: Graeme Stewart [REDACTED]
Sent: 10 April 2012 15:27
To: TES Development Plan - Generic Email Account
Subject: Comments on Local Development Plan
Follow Up Flag: Follow up
Flag Status: Green

Graeme Stewart
35 Old Perth Rd
Milnathort
KY13 9YA
[REDACTED]

Comments on **"Proposed Local Development Plan"**

Section 7.2.2, page 202: To state that "there remains an identified need to improve the retail offer in Kinross, through the provision of a larger format supermarket with a wider product range, close to the town centre." When the council itself owns the old school site and wishes to dispose of it, to then state the above is both dis-ingenuous and smacks of a conflict of interests. Where is the data to back up the statement? Until such time as this data is made public and debated this statement should be rescinded from the local plan.

Section 7.2.2, page 202: I welcome the support for improved settlement boundaries between Milnathort and Kinross. However the line "The improved visual separation between Kinross and Milnathort will be encouraged" should be changed to "The improved visual separation between Kinross and Milnathort will be enforced". The development of the landscape framework to do this should be made a compulsory part of the planning consent for any development at H47, Lathro Farm

Section 7.2.3, page 202: Any future work to upgrade the water treatment works at Kinross and Milnathort should include a requirement to incorporate appropriate environmental screening i.e. tree and shrub planting. The Milnathort waste treatment plant is particularly prominent and presents a very industrial site in a rural area.

Regards,
Graeme Stewart

From: [REDACTED]
Sent: 20 March 2012 16:36
To: TES Development Plan - Generic Email Account
Subject: Re: Proposed Local Development Plan

Follow Up Flag: Follow up
Flag Status: Green

Dear Perth and Kinross Council,

Having visited the drop in meeting at Loch Leven Community Campus, I am e-mailing to completely support the Council in its proposed development sites for Kinross and Milnathort. The development of any brownfield sites and land between existing residential areas and the motorway should be priority for development. The site H46 West Kinross has already got access roads in place and was obviously designed with future development in mind. The site H47 is next to new build and the idea of linking this with H46 with a new access road to Springfield road and therefore more easy access to the motorway both north and south seems to make great sense. The new road would keep more traffic away from the Muirs, the otherwise one and only route to the motorway from the north.

By developing the sites H46 & H47 as suggested it makes sure that for the foreseeable future greenbelt land is protected around Kinross and Milnathort. They are not making anymore of it!

Yours Sincerely,
 Sheila M Wills

-----Original Message-----

From: DevelopmentPlan@pkc.gov.uk
 Date: Jan 31, 2012 16:04
 To: "TES Development Plan - Generic Email Account"<DevelopmentPlan@pkc.gov.uk>
 Subject: Proposed Local Development Plan

Dear Sir/Madam

I refer to our previous correspondence relating to the above and would inform you that the Perth and Kinross Proposed Local Development Plan has been published for a period of representation commencing on 30 January and ending on 10 April 2012.

The Proposed Local Development Plan represents the Council's settled view on the appropriate use of land in Perth and Kinross for the period to 2024 and beyond. The Proposed Local Development Plan contains detailed policies and proposals for the Council Area and is published for representation. Unresolved representations will be submitted to Scottish Ministers and will be taken to examination which is due to be held in 2013. When Adopted the Local Development Plan will replace the existing 6 adopted Local Plans.

The Proposed Plan, together with its supporting documents, is available to download from the Council's website and an online version is available for you to view and make representation on. All this information can be found at www.pkc.gov.uk/Proposed LDP

The documents are also available for inspection at Pullar House between the hours of 8.45 am and 5.00pm Monday to Friday, as well as at all local libraries/community campuses and area offices during normal opening hours.

Further information may be obtained by calling [REDACTED] using this email address or visiting the Council's website.

Information events are being held in February and March and details of these are shown in the attached table.

Representations on the proposed local development plan should be in writing and received by 4pm on Tuesday 10 April 2012. It should be noted that there will be no further opportunities to make representations on the Plan after this date.

Representation should be made using the online Local Development Plan but an electronic form is also available on the website. A paper [REDACTED] form can be obtained from Pullar House or by telephoning [REDACTED]

DevelopmentPlan@pkc.gov.uk

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

Yours sincerely

Brenda Murray
Team Leader
Local Development Plan Team

RECEIVED
10 APR 2012

Colzie House,
Easter Balgedie,
Nr Kinnesswood,
Kinross,
Perth and Kinross-shire,
KY13 9HQ

4th April, 2012

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

Dear Sir/Madam,

Re: Consultation on Proposed Local Development Plan, Kinross-shire:

Your Proposal to Remove Village Envelope Round Easter Balgedie (KY13 9HQ), near Kinnesswood

We write in support of your proposal to remove the village envelope round the hamlet of Easter Balgedie for the following reasons:

1. Until recently (within the last ten years) there was no village envelope round the hamlet of Easter Balgedie.
2. The envelope which was recently drawn around the hamlet is subjective; it does not follow the actual limits of the hamlet; it does not follow the historical borders of the hamlet; it excludes properties or parts of properties which form part of the hamlet and which have formed part of the hamlet for many years; it is therefore open to challenge.
3. The removal of the envelope is thus logical.
4. The hamlet can be protected against unnecessary and undesirable future development by extant planning and other policies.

Yours sincerely,



Michael and Anne O'Kane

Colzie House,
Easter Balgedie,
Nr Kinnesswood,
Kinross,
Perth and Kinross-shire,
KY13 9HQ

4th April, 2012

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Yours sincerely,

Michael and Anne O'Kane