

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	Andrew McCafferty Associates on behalf of JW Farquharson and GD Strawson
Address and Postcode	The Old Barn, 38 Cupar Road, Auchtermuchty, Fife KY14 7DJ
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	4. Perth and Kinross Spatial	Page no.	<input type="text"/>	Paragraph no.	4.3.17

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

4. What is your representation?

Are you supporting the Plan?

Or

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

A reference should be added to encouraging growth at public transport nodes.

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

The Plan needs to set the appropriate framework to direct and encourage growth to be located close to travel nodes where public transport is available such as existing railway stations and locations where new rail infrastructure such as new stations can be provided, for example in the vicinity of the existing railway line going through Grange.

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

Save a copy

Print

Submit

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

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

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

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	Andrew McCafferty Associates on behalf of JW Farquharson and GD Strawson
Address and Postcode	The Old Barn, 38 Cupar Road, Auchtermuchty, Fife KY14 7DJ
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	3.6 Transport and Accessibility	Page no.	<input type="text"/>	Paragraph no.	3.6.3

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.

References added to promoting development close to public transport hubs such as railway stations and planned/proposed railway stations.

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

The Plan fails to give consideration to the merits of allocating a significant amount of development around railway stations within the Plan area. This is vital to promote sustainable travel over the Plan period.

The future development of Perth and Kinross requires major investment in new and improved public transport infrastructure and not an emphasis on new road-building. Encouragement should be given in the text of the Plan to the creation of a new railway station in the Carse of Gowrie in the vicinity of Grange.

New and improved railway infrastructure will lead to sustainable economic development and at the same time protect and improve the environment, improve social inclusion and accessibility. Building more roads is not the answer to a more sustainable future.

The vision should be to plan for new development around railway stations and to plan for new rail infrastructure. This strategy was discussed and supported at length at the Lochgelly charrette. The agreed vision for that settlement was to focus a significant proportion of new development around a re-sited railway station. This is the kind of vision that should be underpinning the Council's approach to planning for new development not concentrating such an enormous amount of resources on road building which will encourage more road traffic.

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

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

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

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

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

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	Andrew McCafferty Associates on behalf of JW Farquharson and GD Strawson
Address and Postcode	The Old Barn, 38 Cupar Road, Auchtermuchty KY14 7DJ
Telephone no.	[REDACTED]
Email address	[REDACTED]

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

2. Which document are you making a representation on?

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

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

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

Policy ref.	<input type="text"/>	or			
Site ref.	<input type="text"/>	or			
Chapter	<input type="text" value="2"/>	Page no.	<input type="text"/>	Paragraph no.	<input type="text" value="2.4.10 to 2.4.14 inc."/>

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

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

The addition of references in paragraphs 2.4.10, 2.4.12, 2.4.13 and 2.4.14 to public transport.

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

There is no reference in the Vision and Objectives to focussing development next to existing public transport routes such as railways. There is no reference to reducing the use of private cars or encouraging the use of public transport or maximising accessibility to public transport routes, for example railways and existing stations/transport nodes.

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

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

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

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

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

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	Andrew McCafferty Associates on behalf of JW Farquharson and GD Strawson
Address and Postcode	The Old Barn, 38 Cupar Road, Auchtermuchty, Fife KY14 7DJ
Telephone no.	[REDACTED]
Email address	[REDACTED]

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

2. Which document are you making a representation on?

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

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

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

Policy ref.	<input type="text"/>	or			
Site ref.	<input type="text"/>	or			
Chapter	<input type="text" value="2"/>	Page no.	<input type="text"/>	Paragraph no.	<input type="text" value="2.4.2"/>

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

4. What is your representation?

Are you supporting the Plan?

Or

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

Need for a clearer diagram in paragraph 2.4.2.

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

The existing diagram at paragraph 2.4.2 is indecipherable.

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

Save a copy

Print

Submit

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

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

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

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	Andrew McCafferty Associates on behalf of JW Farquharson and GD Strawson
Address and Postcode	The Old Barn, 38 Cupar Road, Auchtermuchty, Fife KY14 7DJ
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	2 The Vision and Objectives	Page no.	<input type="text"/>	Paragraph no.	2.2.2

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

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

The Vision Statement should include reference to identifying a strategic growth point in the Carse of Gowrie in the vicinity of Grange to meet needs towards the latter stage of the LDP ie 2019 onwards.

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

The Vision Statement does not explain why such a large proportion of the growth required over the Plan period up to 2024 is focussed on peripheral expansion of Perth City. There is no discussion of reasonable alternatives. Effectively, the vision puts virtually all of the "eggs" of planned growth in "one basket" ie growth on the north and west sides of Perth without properly considering and evaluating the benefits in environmental and sustainability terms of creating a new growth point to complement the peripheral expansion of the city. Consideration of this issue is critical in view of the likely population and household growth forecast over the Plan period.

The Cross Tay Relief Road is not proven to be economically viable and is likely to take a considerable period of time to implement. Against this background, it would be prudent planning to identify a location for strategic growth that would complement the concentration on the edges of Perth and which could be brought forward to contribute supply should there be delay in delivering residential units around Perth in the strategic areas identified in the Draft LDP.

I have attached a copy of the Vision document for development of "Horn Grange" to a separate objection in relation to the Perth Area Spatial Strategy.

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

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

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

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

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

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	Andrew McCafferty Associates on behalf of JW Farquharson and GD Strawson
Address and Postcode	The Old Barn, 38 Cupar Road, Auchtermuchty, KY14 7DJ
Telephone no.	[REDACTED]
Email address	[REDACTED]

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

2. Which document are you making a representation on?

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

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

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

Policy ref.	<input type="text"/>	or			
Site ref.	<input type="text"/>	or			
Chapter	<input type="text" value="5.1 Spatial Strategy"/>	Page no.	<input type="text"/>	Paragraph no.	<input type="text" value="5.1.5"/>

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.

Clarification is required in relation to the last sentence in paragraph 5.1.5. There appears to be a word missing.

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

The final sentence in paragraph 5.1.5 does not make sense. Amendment is required; it is likely that a word or phrase is missing.

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

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

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

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

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

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	Andrew McCafferty Associates on behalf of JW Farquharson and GD Strawson
Address and Postcode	The Old Barn, 38 Cupar Road, Auchtermuchty, Fife KY14 7DJ
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	5.1 Spatial Strategy	Page no.	<input type="text"/>	Paragraph no.	5.1.11

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

4. What is your representation?

Are you supporting the Plan?

Or

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

Addition of Grange as a housing site in the table at paragraph 5.1.11 stating 1000 housing numbers up to 2024 and 2,500 beyond 2024.

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

Grange is a suitable housing site and should be included within the table of housing sites to come forward over the Plan period.

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

Save a copy

Print

Submit

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

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

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

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	Andrew McCafferty Associates on behalf of JW Farquharson and GD Strawson
Address and Postcode	The Old Barn, 38 Cupar Road, Auchtermuchty, Fife KY14 7DJ
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	5 Perth Area Spatial Strategy	Page no.	<input type="text"/>	Paragraph no.	5.2.7 and 5.2.8

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.

Inclusion of Grange as a Long Term Strategic Growth Area.

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

Development of a consolidated/new settlement at Grange represents a sustainable way to accommodate part of the growth to be catered for over the Plan period and beyond. The LDP should refer to Grange as a Long Term Strategic Development Area to accommodate part of the growth in the two areas identified at Berthapark and Perth West.

The text of the Plan should refer to:

"Location	Size	Number
Grange	279 ha (est)	3000+
		In excess of 25 ha of employment land"

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

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

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

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

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

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	Andrew McCafferty Associates
Address and Postcode	The Old Barn, 38 Cupar Road, Auchtermuchty, Fife KY 14 7DJ
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	5 Perth Area Spatial Strategy	Page no.	<input type="text"/>	Paragraph no.	5.18

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

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

Inclusion of a reference to a long term strategic development area at Errol Airfield/Grange.

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

Land around Grange represents a strategic opportunity to create a consolidated/new settlement to meet a proportion of the growth up to 2024 and beyond. The Plan should identify this area as a growth hub so that the lead-in time is available to create the supporting infrastructure.

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

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

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

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

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

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	Andrew McCafferty Associates
Address and Postcode	The Old Barn, 38 Cupar Road, Auchtermuchty KY14 7DJ
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	5.1 Spatial Strategy	Page no.	<input type="text"/>	Paragraph no.	5.1.1 and 5.1.2

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

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

The inclusion of a strategic growth area in the vicinity of Grange in the Carse of Gowrie. (A Supporting Statement explaining the development concept is attached to this objection).

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

Messrs Farquharson and Strawson own sufficient land at Grange to consolidate the existing dispersed pockets of residential development and create a new community based around a new railway station on the existing line which serves Perth and Dundee. This would be a strategic growth point to complement the peripheral expansion of Perth city.

We object to the non-inclusion of "Horn Grange" as a strategic growth area. There is an over concentration of expansion proposed at West/North West Perth and the north west side of the city in particular is subject to environmental and flood risk constraints. A proportion of the growth directed towards the periphery of Perth should be diverted to the Carse of Gowrie in the vicinity of Grange to create a new settlement. This would be a more sustainable option to accommodate growth and would be based primarily upon rail travel and not car usage.

We envisage a new community that knits together the existing housing at Grange and includes full provision of education and other community facilities that would be needed to support, at its completion, up to 3,500 homes. The Supporting Statement sets out the comprehensive land use model that is proposed that would include employment areas and a new commercial centre to serve the Carse.

The LDP should recognise the long term potential around Grange and refer to this concept in the LDP. We envisage development starting towards the end of the Local Plan period ie about year 2019 and continuing beyond the end of the Plan period in 2024. We request that a reference be included in paragraph 5.1.1 to Grange as an additional Strategic Growth Area.

Identification of Grange to contribute towards meeting housing needs in the latter part of the Plan period would not prejudice implementation of the growth around the west and north sides of Perth which is planned to come forward straightaway. If, for whatever reason, development in these areas is delayed then growth at Grange could be brought forward to fill the gap in supply.

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

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

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

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

OVER BLAIRHILL, RUMBLING BRIDGE, KINROSS KY13 0PU
Office Tel/Fax [REDACTED] [REDACTED] Email: [REDACTED]

Planning Department
PERTH AND KINROSS COUNCIL
Pullar House
35 Kinnoull Street
PERRTH PH1 5GD

10th April 2012

Dear Sir / Madam,

REPRESENTATIONS ON THE KINROSS PROPOSED LOCAL DEVELOPMENT PLAN

Please find listed below my comments on the proposed Local Plan for your consideration:

In general it is an impressive document which aims to resolve its competing pressures very well.

Specifically, I would ask for reconsideration of the following:

Page 32 Policy RD3 Housing in the Countryside.

I support the policy itself. However, the removal of settlement boundaries from a number of small settlements, which will therefore be re-defined as "Building Groups" in the countryside and eligible for expansion under paragraph (a) of this policy, will render them subject to excessive pressure for expansion, with the risk of over-development. Some means of addressing this risk should be found, preferably the reinstatement of these settlement boundaries.

Page 213 7.4 Blairingone

A large "white area" has been included within the enlarged settlement boundary. This should be designated as a housing site for 30 houses, in recognition of the likely development outcome, but also to maintain the housing target while reducing the excessive housing allocation for Powmill, discussed below.

Page 224 7.12 Keltybridge and Maryburgh.

I support the allowance of a "white area" for Maryburgh - permitting its sympathetic enlargement - in recognition of its historic significance as a planned village by one of Scotland's most important early architects, William Adam, after whose wife it was named. However, to ensure that any development is carried out in that context, a Site Development Brief, which takes into account the original intention of plot layout and house size / design, should be prepared and used as the basis of consideration of forthcoming proposals.

Page 229 7.15 Powmill Housing Site H53

The allocation of 120 houses is excessive, and their distribution fails to take advantage of the possibilities for a village square to the east of the A823, which emerged as an idea with community support from the proposals and consultations

carried out by the Fossoway Action Group under Councillor Mike Barnacle. The number should be reduced to more like 90, with the balance being allocated to Blairingone where they will help support facilities such as the school. The depth of H53 can be reduced, a wooded footpath link to the outlying housing at Gartwhinzean Feus would help tie the village together, and a line of houses along the southern edge of the village green would help enclose it to provide an attractive community public space.

Page 232 7.16 Rumbling Bridge

The settlement boundary should be re-instated around the houses at the northern edge of the village, including Merryhills, Merryorchard, Fir Grove, and the housing site between these (recently granted consent for housing). I support the exclusion from the settlement boundary of the field between these houses and the Nursing Home.

Yours faithfully,

A large black rectangular redaction box covering the signature area.

Matthew Pease

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 Tim Esparon
Address and Postcode	c/o TMS Planning Limited, "Balclune", 32 Clune Road, Gowkhall
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.	H54 Scotlandwell	or			
Chapter	7	Page no.	234 and 235	Paragraph no.	<input type="text"/>

Perth and Kinross Local Development Plan – Proposed Plan **Representation Form****4. What is your representation?**

Are you supporting the Plan?

Or

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

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

See attached sheet

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.

Subject: Scotlandwell - Site reference H54

The allocation of the site identified at H54 Scotlandwell for residential development is considered to be an appropriate and pragmatic response to meeting housing needs within the village and in the wider Kinross-shire Housing Market Area. In brief, the site is well located/related to the village and its use for new housing would facilitate the delivery of a fully integrated residential development in terms of both form and function. The site has a landscape context which would provide containment/setting for the new properties. The layout/development form would be designed sensitively in order to maintain the reasonable amenity of neighbouring residents. Access is readily available from the B920, The Causeway, and there is also potential for a link to the area of public open space at the north-east boundary (Friar Place) in order to provide additional access/integration for cyclists and pedestrians. The site, proposed landscape enhancement and the pedestrian link are detailed on the attached plan.

Scotlandwell, including the subject site, falls outwith the Loch Leven catchment and the designated Area of Great Landscape Value. No adverse impacts on these sensitive areas/designations would therefore arise. In terms of the built environment, the site lies outwith the designated Scotlandwell Conservation Area and would have no material impact on its underlying core character or its setting (other than an opportunity for significant enhancement on the southern approach to the village).

Perth and Kinross Council's Scotlandwell Conservation Area Appraisal highlighted the main core of the settlement as worthy of "protection" as are key views to/from the village. It noted the form/appearance of the modern development presently to the south of the village (abutting the subject site) and considered this of a form which fails to respect or enhance the original character of the village. Development of the allocated H54 site would allow a high quality of design to be incorporated in order to facilitate the provision of a more sympathetic, less suburban, form of development on this main approach to Scotlandwell without impacting on key views to or from the Conservation Area (as per the Scotlandwell Conservation Area Appraisal). It would allow for the incremental growth of the settlement into an area with a clearly established (and enhanced) landscape framework which would absorb and mitigate any related impact and result in a significantly improved village form, one more sympathetic to the core character of the village.

Physical and social infrastructure is readily available in order to serve the development. From initial assessment it is understood that electricity, mains water and mains drainage are all readily available. The development of the new Kinross High School has addressed secondary school capacity, while Portmoak Primary has a capacity of 140 pupils and an intake of approximately 100 pupils, thereby providing sufficient spare capacity in order to cater for demand arising from the development (this being estimated at 8 children based on a 25% quotient and a development, as per the local

development plan allocation, of 30 units). Of the 30 units it is anticipated that approximately 25% of these would be for affordable housing use. A flood risk assessment carried out previously for this site indicated that there were no issues in this respect. For all of the reasons set out, this proposal is considered both appropriate and deliverable and therefore would represent a fully effective residential allocation through the local development plan. It would help sustain the local and wider community and contribute positively towards the sustainability requirements set out in Scottish Planning Policy and in the emerging local development plan strategy.

Assessing the development against the criteria set out within paragraph 55 of Planning Advice Note 2/2010 "Affordable Housing and Housing Land Audits" wherein using the stated criteria the following can be concluded: -

ownership: the site is within the ownership/control of a party which can be expected to release it for development. Indeed the site is presently being actively assessed by a recognised house builder with the intent of progressing development in early course following a successful local development plan allocation;

physical: the site is free from constraints related to slope, aspect, flood risk, ground stability or vehicular access which would preclude its development. Indeed, it enjoys a south facing aspect which would allow maximisation of solar gain as part of any development;

contamination: previous use has not resulted in contamination of the site;

deficit funding: no deficit funding is required;

marketability: the site can be developed well within the local development plan period. It is anticipated that the site could make an early contribution to the provision of new housing within the area;

infrastructure: the site is free of infrastructure constraints; and

land use: housing is the preferred use of the land in planning terms due to its relationship to existing residential properties and the potential to contribute towards the delivery of the local development plan spatial strategy.

The site is not within any identified sensitive landscape, it would not adversely impact on the designated Conservation Area, the site does not flood, access is readily available and there is an opportunity to provide a fully integrated development of quality befitting the southern entrance to historic Scotlandwell. Development on this site would fully comply with the local development plan strategy and Scottish Planning Policy and should be fully supported for residential development through the local development plan.

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

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

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

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 and Mrs A McLaren
Address and Postcode	c/o TMS Planning Limited, "Balclune", 32 Clune Road, Gowkhall
Telephone no.	[REDACTED]
Email address	[REDACTED]

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

2. Which document are you making a representation on?

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

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

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

Policy ref.	<input type="text"/>	or			
Site ref.	<input type="text"/>	or			
Chapter	<input type="text" value="7"/>	Page no.	<input type="text" value="198"/>	Paragraph no.	<input type="text" value="7.1.8 and 7.1.9"/>

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

4. What is your representation?

Are you supporting the Plan?

Or

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

The text in paragraph 7.1.8 should be altered to remove reference to the 10% housing reduction in the Kinross area. The table in para 7.1.9 should be altered to detail the full HMA requirements and the figures in the columns altered to reflect the alteration to the Housing Market Requirement - this being increased from 880 to 980 units.

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

See attached sheet

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

Save a copy

Print

Submit

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

PERTH AND KINROSS COUNCIL LOCAL DEVELOPMENT PLAN PROPOSED PLAN - REPRESENTATION TO PROPOSED PLAN

Page 198 of the Proposed Plan paragraph 7.1.8 states that *"TAYplan has identified that in order to accommodate projected population increases approximately 70 houses will be required per year. However, it is proposed to reduce this by 10% because of the significant adverse environmental impact on Loch Leven. If this lower build rate is to be achieved, the Local Development Plan will need to identify an effective housing land supply capable of delivering 880 houses"*.

There are 2 issues arising from this approach.

Firstly, is there sufficient justification for the 10% reduction, the so called *"significant adverse environmental impact on Loch Leven"*, and secondly, what are the related implications on the Kinross Housing Market Area and the communities therein of this approach. Tayplan does not require the redistribution of 10% of the housing requirement from the Kinross Housing Market Area it merely makes provision for such an occurrence where this can be fully justified *"in exceptional cases of environmental capacity"* – no such justification has been advanced by Perth and Kinross Council.

Despite the terms of the environmental report supporting the emerging local development plan, there remains no justification to relocate 10% of the identified housing requirement from the Kinross Housing Market Area to the Perth Housing Market Area. This approach is based largely on the perception that further development within the Kinross HMA would have negative environmental consequences for Loch Leven. While this is in reality a counterintuitive argument (for reasons set out below), even setting this to one side for the moment, it is clear that large areas of Kinross-shire, approximately 74% from the environmental report, has either no/few development constraints and/or has recognised development potential. There are settlements outwith Loch Leven catchment which have few environmental issues and where development to address the needs of the individual settlements and of the wider area could be realised. Settlements such as Gairney Bank offer good opportunities for development in accessible locations and in an area where demand for new properties, and therefore deliverability, exists.

Moving housing provision away from the area it is required within has a potentially negative impact on the area and its residents in terms of meeting their legitimate housing needs and, in the case of the Kinross Housing Market Area, even in present economic conditions, helping to sustain the highest average house prices within the Perth and Kinross Council area. This does not assist the delivery of sustainable mixed communities. If you limit legitimately required development, in addition to not meeting need and inflating demand and therefore prices, how does the required affordable housing get delivered? The proposal to divert the 10% of the Kinross

requirement to the Perth Housing Market Area, an area itself with significant environmental constraints (including flooding) and where the delivery of much of the required development is significantly constrained by lack of available infrastructure, large scale individual allocations, and the need for substantial new investment, cannot presently be justified.

According to the Main Issues Report, transportation proposals in order to allow the delivery of the Perth Area Strategy will cost an estimated £80-100 million alone, that's before new drainage, schools and other required infrastructure investment is factored into the development costs. There also remain issues with land ownership related to at least some of the required infrastructure projects which will result in inevitable delays and increased costs – are they in fact deliverable within the local development plan timescale? It is noted that measures to deliver new infrastructure are being looked at (new models/funding mechanisms) but to date there are no solutions and therefore it appears that significant new development in the Perth Housing Market Area is itself constrained – why then would it be an appropriate response to divert development to this area from another which CAN provide for needs locally?

The temptation to restrict development in more “rural” areas (e.g. Kinross-shire) and to direct this to larger centres of population (as referred to above) will not necessarily deliver a more sustainable development form. Travel is a much more complicated matter than simply proximity and a more balanced/rounded assessment will be required. Failing to provide for new development within local areas may frustrate local indigenous expansion, result in population decline and potentially impact adversely on the local economy and local services. Sustainable growth in all communities should be the approach adopted. The local development plan should therefore plan for the full housing requirement to be met within the Kinross Housing Market Area and no 10% reduction should be planned for.

In terms of the specific Loch Leven drainage issue which appears to underpin the 10%, Perth and Kinross Council's approach is counterintuitive. Paragraph 7.1.2 page 197 states that: -

“The Loch Leven Catchment Management Plan produced in 1999, through a multi-agency collaborative project, sought to identify measures to reduce the phosphorus entering the Loch. Within the catchment area more rigorous policies have sought to ensure that new development does not add to the amount of phosphorus entering the Loch but contributes to achieving a net reduction. The principal aim of the Catchment Management Plan - to reduce the levels of phosphates entering Loch Leven - remains relevant today”.

In short, this paragraph tells us that new development meeting more rigorous standards (the Kinross Area Local Plan policy seeks 125% mitigation) remains relevant in assisting the recovery of Loch Leven by

achieving net reductions in phosphorus within the catchment. New development is removing old polluting septic tanks and replacing these with new properly maintained treatment facilities with legally binding maintenance obligations through agreements under Section 75 of the Town and Country Planning (Scotland) Act and also monitored by the Scottish Environment Protection Agency. If the opportunity to deliver this form of development is removed then how are the phosphorus improvements to be delivered?

In addition, page 199 of the emerging local development plan related to "*Housing within the Loch Leven Catchment*" states at paragraph 7.1.15 that:

"The Loch Leven Catchment Area extends over much of Kinross-shire. Work has been undertaken over the last 30 years to reduce the input of phosphorus into the Loch. Although there have been signs of improvement in the Loch's condition, there is a continuing need to reduce both phosphorus and nitrogen inputs into the Loch. The aim therefore is to ensure that there is no increase of phosphorus in the Loch Leven Catchment arising from waste water associated with new developments. Within the Catchment Area, under Policy EP7, new development will be required to connect to a publicly maintained drainage system or provide mitigation measures capable of removing 125% of phosphorus likely to be generated by the development."

This again appears to recognise that new development within the catchment can assist the removal of phosphorus thus dispelling the underlying justification for the 10% relocation to the already significantly constrained Perth Housing Market Area. Indeed, such an approach further flies in the face of established Scottish Planning Policy wherein delivery is a key consideration. How can the additional housing required to meet the needs arising in the Kinross Housing Market Area realistically be delivered in another Housing Market Area, one which is clearly constrained in output terms and which fails to meet its own delivery requirements?

It therefore remains the case that that there is in fact no "*significant adverse environmental impact on Loch Leven*" of seeking to meet the full needs of the communities within the Kinross Housing Market Area within the defined area. The consequences of failing to make the required provision are entirely negative for the area, including the failure to provide affordable housing which is a major consideration in any area displaying the highest average housing process in the Perth and Kinross Council area. There is no justification either through Tayplan or in Scottish Planning Policy in order to justify the present response proposed by Perth and Kinross Council. The Kinross Housing Market Area should therefore contain residential allocations sufficient to meet the full identified needs of the catchment area.

The table on page 198 paragraph 7.1.9 should be amended to read under column A "980" units. It is also the case, refer separate representation, that Column D related to "Windfall Sites should be deleted as these do not

legitimately form part of the established land supply. Altering Column A and removing Column D results in an overall requirement in Column E "Additional allocations required" of 550 units rather than the 360 units presently detailed. In short land to deliver an additional 190 units is required within the local development plan period, this likely to require a further allocation of 230 units allowing 20% flexibility.

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 James Thomson
Address and Postcode	c/o TMS Planning Limited, "Balclune", 32 Clune Road, Gowkhall
Telephone no.	[REDACTED]
Email address	[REDACTED]

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

2. Which document are you making a representation on?

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

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

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

Policy ref.	<input type="text"/>	or			
Site ref.	<input type="text"/>	or			
Chapter	<input type="text" value="7"/>	Page no.	<input type="text" value="198"/>	Paragraph no.	<input type="text" value="7.1.8 and 7.1.9"/>

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

4. What is your representation?

Are you supporting the Plan?

Or

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

The text in paragraph 7.1.8 should be altered to remove reference to the 10% housing reduction in the Kinross area. The table in para 7.1.9 should be altered to detail the full HMA requirements and the figures in the columns altered to reflect the alteration to the Housing Market Requirement - this being increased from 880 to 980 units.

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

See attached sheet

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

Save a copy

Print

Submit

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

PERTH AND KINROSS COUNCIL LOCAL DEVELOPMENT PLAN PROPOSED PLAN - REPRESENTATION TO PROPOSED PLAN

Page 198 of the Proposed Plan paragraph 7.1.8 states that *"TAYplan has identified that in order to accommodate projected population increases approximately 70 houses will be required per year. However, it is proposed to reduce this by 10% because of the significant adverse environmental impact on Loch Leven. If this lower build rate is to be achieved, the Local Development Plan will need to identify an effective housing land supply capable of delivering 880 houses"*.

There are 2 issues arising from this approach.

Firstly, is there sufficient justification for the 10% reduction, the so called *"significant adverse environmental impact on Loch Leven"*, and secondly, what are the related implications on the Kinross Housing Market Area and the communities therein of this approach. Tayplan does not require the redistribution of 10% of the housing requirement from the Kinross Housing Market Area it merely makes provision for such an occurrence where this can be fully justified *"in exceptional cases of environmental capacity"* – no such justification has been advanced by Perth and Kinross Council.

Despite the terms of the environmental report supporting the emerging local development plan, there remains no justification to relocate 10% of the identified housing requirement from the Kinross Housing Market Area to the Perth Housing Market Area. This approach is based largely on the perception that further development within the Kinross HMA would have negative environmental consequences for Loch Leven. While this is in reality a counterintuitive argument (for reasons set out below), even setting this to one side for the moment, it is clear that large areas of Kinross-shire, approximately 74% from the environmental report, has either no/few development constraints and/or has recognised development potential. There are settlements outwith Loch Leven catchment which have few environmental issues and where development to address the needs of the individual settlements and of the wider area could be realised. Scotlandwell is a settlement with significant potential to help meet identified new housing need within the local area and should therefore be considered for an additional scale of residential land allocation over that proposed in the emerging local development plan in order to meet the needs of the Kinross Housing Market Area, including balancing the scale of development proposed for the western part of the District (Powmill).

Moving housing provision away from the area it is required within has a potentially negative impact on the area and its residents in terms of meeting their legitimate housing needs and, in the case of the Kinross Housing Market Area, even in present economic conditions, helping to sustain the highest average house prices within the Perth and Kinross Council area. This does not assist the delivery of sustainable mixed communities. If you limit

legitimately required development, in addition to not meeting need and inflating demand and therefore prices, how does the required affordable housing get delivered? The proposal to divert the 10% of the Kinross requirement to the Perth Housing Market Area, an area itself with significant environmental constraints (including flooding) and where the delivery of much of the required development is significantly constrained by lack of available infrastructure, large scale individual allocations, and the need for substantial new investment, cannot presently be justified.

According to the Main Issues Report, transportation proposals in order to allow the delivery of the Perth Area Strategy will cost an estimated £80-100 million alone, that's before new drainage, schools and other required infrastructure investment is factored into the development costs. There also remain issues with land ownership related to at least some of the required infrastructure projects which will result in inevitable delays and increased costs – are they in fact deliverable within the local development plan timescale? It is noted that measures to deliver new infrastructure are being looked at (new models/funding mechanisms) but to date there are no solutions and therefore it appears that significant new development in the Perth Housing Market Area is itself constrained – why then would it be an appropriate response to divert development to this area from another which CAN provide for needs locally?

The temptation to restrict development in more “rural” areas (e.g. Kinross-shire) and to direct this to larger centres of population (as referred to above) will not necessarily deliver a more sustainable development form. Travel is a much more complicated matter than simply proximity and a more balanced/rounded assessment will be required. Failing to provide for new development within local areas may frustrate local indigenous expansion, result in population decline and potentially impact adversely on the local economy and local services. Sustainable growth in all communities should be the approach adopted. The local development plan should therefore plan for the full housing requirement to be met within the Kinross Housing Market Area and no 10% reduction should be planned for.

In terms of the specific Loch Leven drainage issue which appears to underpin the 10%, Perth and Kinross Council's approach is counterintuitive. Paragraph 7.1.2 page 197 states that: -

“The Loch Leven Catchment Management Plan produced in 1999, through a multi-agency collaborative project, sought to identify measures to reduce the phosphorus entering the Loch. Within the catchment area more rigorous policies have sought to ensure that new development does not add to the amount of phosphorus entering the Loch but contributes to achieving a net reduction. The principal aim of the Catchment Management Plan - to reduce the levels of phosphates entering Loch Leven - remains relevant today”.

In short, this paragraph tells us that new development meeting more rigorous standards (the Kinross Area Local Plan policy seeks 125% mitigation) remains relevant in assisting the recovery of Loch Leven by achieving net reductions in phosphorus within the catchment. New development is removing old polluting septic tanks and replacing these with new properly maintained treatment facilities with legally binding maintenance obligations through agreements under Section 75 of the Town and Country Planning (Scotland) Act and also monitored by the Scottish Environment Protection Agency. If the opportunity to deliver this form of development is removed then how are the phosphorus improvements to be delivered?

In addition, page 199 of the emerging local development plan related to "*Housing within the Loch Leven Catchment*" states at paragraph 7.1.15 that:

"The Loch Leven Catchment Area extends over much of Kinross-shire. Work has been undertaken over the last 30 years to reduce the input of phosphorus into the Loch. Although there have been signs of improvement in the Loch's condition, there is a continuing need to reduce both phosphorus and nitrogen inputs into the Loch. The aim therefore is to ensure that there is no increase of phosphorus in the Loch Leven Catchment arising from waste water associated with new developments. Within the Catchment Area, under Policy EP7, new development will be required to connect to a publicly maintained drainage system or provide mitigation measures capable of removing 125% of phosphorus likely to be generated by the development."

This again appears to recognise that new development within the catchment can assist the removal of phosphorus thus dispelling the underlying justification for the 10% relocation to the already significantly constrained Perth Housing Market Area. Indeed, such an approach further flies in the face of established Scottish Planning Policy wherein delivery is a key consideration. How can the additional housing required to meet the needs arising in the Kinross Housing Market Area realistically be delivered in another Housing Market Area, one which is clearly constrained in output terms and which fails to meet its own delivery requirements?

It therefore remains the case that that there is in fact no "*significant adverse environmental impact on Loch Leven*" of seeking to meet the full needs of the communities within the Kinross Housing Market Area within the defined area. The consequences of failing to make the required provision are entirely negative for the area, including the failure to provide affordable housing which is a major consideration in any area displaying the highest average housing process in the Perth and Kinross Council area. There is no justification either through Tayplan or in Scottish Planning Policy in order to justify the present response proposed by Perth and Kinross Council. The Kinross Housing Market Area should therefore contain residential allocations sufficient to meet the full identified needs of the catchment area.

The table on page 198 paragraph 7.1.9 should be amended to read under column A "980" units. It is also the case, refer separate representation, that Column D related to "Windfall Sites should be deleted as these do not legitimately form part of the established land supply. Altering Column A and removing Column D results in an overall requirement in Column E "Additional allocations required" of 550 units rather than the 360 units presently detailed. In short land to deliver an additional 190 units is required within the local development plan period, this likely to require a further allocation of 230 units allowing 20% flexibility.

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	Messrs A and J Bayne
Address and Postcode	c/o TMS Planning Limited, "Balclune", 32 Clune Road, Gowkhall
Telephone no.	[REDACTED]
Email address	[REDACTED]

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

2. Which document are you making a representation on?

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

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

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

Policy ref.	<input type="text"/>	or			
Site ref.	<input type="text"/>	or			
Chapter	<input type="text" value="7"/>	Page no.	<input type="text" value="198"/>	Paragraph no.	<input type="text" value="7.1.9"/>

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

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

The table in para 7.1.9 should be altered to detail the full HMA requirements and the figures in the columns altered to reflect the alteration to the Housing Market Requirement - this being increased from 880 to 980 units. In addition, Column D should be deleted and Column E altered to reflect the deletion of column D. Column E will then be increased by a further 90 units. In short, adjusting the Housing Land Requirement (Column A) to meet the full HMA requirement (980 units) and removing Column D increases the Additional Allocations Required in Column E to 1070 units - thereby requiring the allocation of additional sites in order to meet the land requirements.

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

The table and related list contained in paragraph 7.1.9 page 198 contains a section (Column D) where an assumption related to the contribution to be made to the effective housing land supply is made. This is set at 10% of the requirement (albeit the rationale for this particular level remains unclear). No matter the rationale for this it is clear from Planning Advice Note 2/2010 (paragraph 62) "Affordable Housing and Housing Land Audits" that Windfall sites should "only count towards meeting the housing land requirement once planning permission has been granted and it is considered to be effective or is being developed". The specific provision for a windfall allowance forming part of the effective land supply is therefore inappropriate and contrary to prevailing Scottish Planning Policy and advice.

The consequences of this approach are that a sufficient residential land allocation/supply, as per the clearly stated requirements underpinning Scottish Planning Policy, will not be provided and the local development plan will therefore fail to meet the underlying requirements of Scottish Planning Policy and of Tayplan.

As indicated, additional effective land allocations therefore require to be made through the local development plan process. In the Kinross Housing Market Area there is the opportunity to allocate a number of smaller, community based, allocations in order to assist delivery, to reflect environmental capacity, and to increase the range and choice of housing (location and types) within the area. Development within the Loch Leven catchment can also deliver environmental improvements (phosphorous reductions) where the requirements set out in proposed local development plan policy EP7 "Drainage within the Loch Leven catchment 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.

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 Philip Sloan
Address and Postcode	c/o TMS Planning Limited, "Balclune", 32 Clune Road, Gowkhall
Telephone no.	[REDACTED]
Email address	[REDACTED]

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

2. Which document are you making a representation on?

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

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

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

Policy ref.	<input type="text"/>	or			
Site ref.	<input type="text"/>	or			
Chapter	<input type="text" value="5"/>	Page no.	<input type="text" value="136"/>	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.

An additional residential land allocation should be made in Methven as an integral part of the Perth Core Area. The subject site (refer attached plans) lies at the north of the village, north of Strathview Place. This site, circa 3 hectares, should be allocated for housing (60-70) units.

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

See Attachments

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.

Land to the North of Strathview Place, Methven Supporting Statement Representation by Philip Sloan

The local development plan (page 136) states that Methven lies approximately 6.5 miles to the west of Perth. It has a population of 1,200 and a good range of community and commercial facilities within the village. There are no capacity constraints presently affecting development in the village. A check of the Scottish Water Assets Register indicates both water and drainage capacity is available to serve new development (April 2012). It is a settlement located within the designated Perth Core Area and well connected to a range of public transport services. It is therefore considered to be a sustainable location for new development.

The requirements of the emerging Tayplan strategy and the designation of the Perth Core Area within the local development plan as the area to accommodate the majority of new residential development are noted and generally accepted. The level of new housing development required within the respective Housing Market Areas within the local development plan period is set out as an annualised average, this equating to 510 units/annum for the Perth HMA (Page 63). The new allocations being promoted through the local development plan in order to address the housing output requirements are also noted and in particular the extensive allocations at Perth West (3000+ houses) and Berthapark (3000+ houses), albeit it is accepted that a significant level of development from these sites is expected beyond 2024. The recorded difficulties in delivering sites of this scale are well rehearsed and there are inherent dangers that non-delivery could adversely impact on the core development strategy. No matter the outcome, it is considered that additional land allocations in the Perth Core Area (outside the constraints experienced in Perth) are required in order to assist delivery of the LDP strategy.

It is clear from the table at paragraph 5.1.10 in the Proposed Plan that the present land supply is failing to meet the required output levels, the completions for the 2010/11 period in the Perth HMA being 190 units or 34% of the requirement. The requirements of Scottish Planning Policy related to the provision of a generous effective residential land supply through the local development plan are noted albeit, based on the 2010/11 figures and a pragmatic assessment of the Housing Land Audit, there appears little prospect, based on the present/proposed allocations, that anything approaching the required output levels will be achieved. This is not all related to tough economic times. It is, by definition, a factor of the lack of effective residential land allocations.

Recognising and accepting the Perth Core Area development strategy approach in the local development plan it is clear that additional land allocations, over and above those proposed in the present local development

plan, will be required in order to assist output and to deliver both the Tayplan and local development plan spatial strategy for the area. This is also the only means by which the plan can address the underlying requirements of Scottish Planning Policy and Planning Advice Note 2/2010.

In short, sites within the Perth Core Area, well related to the respective settlements and having available capacity in terms of physical, social and commercial infrastructure, should therefore be pragmatically considered for allocation as a means of assisting housing delivery. To this end, it is proposed that the subject site, lying to the directly to the north of Methven with available infrastructure, a dedicated access, an appropriate relationship to the settlement, including landscape containment, and of a scale of development capable of delivery within the short/medium term, would represent a fully supportable allocation through the emerging plan.

The site, circa 3 hectares (7 acres) is located to the north of Strathview Place, from where an access would be formed. The site rises gradually northwards to a woodland area which clearly defines the extent of development and provides a context for the proposals. The linear woodland area could also be incorporated within the proposals as an amenity area with public access. This would also facilitate access to neighbouring areas. The site could deliver a range of densities/tenures and would accommodate around 60 units.

For all of the reasons set out it is considered that the subject site comprising land to the north of Strathview Place, Methven, should be allocated for residential development within the Perth and Kinross Council Local Development Plan.

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

TMS PLANNING AND DEVELOPMENT SERVICES LTD
"Balclune", 32 Clune Road, Gowkhall, Fife, KY12 9NZ



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 and Mrs A McLaren
Address and Postcode	c/o TMS Planning Limited, "Balclune", 32 Clune Road, Gowkhall
Telephone no.	[REDACTED]
Email address	[REDACTED]

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

2. Which document are you making a representation on?

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

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

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

Policy ref.	<input type="text"/>	or			
Site ref.	<input type="text"/>	or			
Chapter	<input type="text" value="7"/>	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.

The subject site at GaineyBank (see attachments) should be included in the local development plan for housing development.

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

See attached statement and 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.

Save a copy

Print

Submit

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

**PERTH AND KINROSS COUNCIL LOCAL
DEVELOPMENT PLAN**

**REPRESENTATION:- PROPOSED RESIDENTIAL
DEVELOPMENT AT GAIRNEYBANK**

SUBMISSION BY MRS AND MRS A MCLAREN

APRIL 2012

TMS PLANNING AND DEVELOPMENT SERVICES LIMITED

1.0 PROPOSED SITE/DEVELOPMENT

1.1 This statement supports the allocation of land to the north of Gairneybank (the subject site) for residential development through the emerging Perth and Kinross Council Local Development Plan (see attached plan for subject site).

1.2 The site, approximately 0.6 hectares in area, lies within the northern part of the village and comprises an area of agricultural land abutting the existing village. The site is bounded to the: -

North - by agricultural land;

South - by an existing dwellinghouse forming the end of a row of 5 dwellings on the east side of the B996;

East - by agricultural land; and,

West - by the B996.

1.3 The site has clearly defined/defensible boundaries to 2 sides presently (south and west) and development of the site would include the provision of clearly defined/defensible boundaries to the north and east within land owned by my clients. It is envisaged that the development would comprise a plot style development fully in character with the predominant form of development within Gairney Bank albeit of a more rural character than recently completed development directly opposite. The extent/nature of the proposal would in effect marry the northern extent of development within the village on both sides of the B996 and thereby have little impact on the underlying built form/character of the village.

1.4 Access to the site would be taken directly from the B996 either in the form of individual plot accesses or combined accesses. This would be determined in conjunction with Perth and Kinross Council's Roads Service. Whichever approach is favoured would result in the removal of some existing vegetation albeit the development would be designed to minimise this. There is at least 1 established tree on the site frontage that my clients would wish to retain. New planting would also be provided around/within the site and could be supplemented by specimen trees on land between the northern site boundary and the access road to Classloch Farm.

1.5 It is noted that the site lies within the Loch Leven catchment (albeit outwith the designated AGLV). In light of the environmental issues related to drainage within this area and the recorded problems of discharge to the adjacent watercourse from existing property's septic tanks, development of the site would include the provision of modern foul drainage treatment arrangements which would allow connection from existing properties and thereby deliver a significant environmental gain within this environmentally sensitive area. This would fully comply with the Loch Leven Management Plan and with Policy EP7 "Drainage within the Loch Leven Catchment Area" as contained within the emerging local development plan.

1.6 Locationally, Gairney Bank is close to Kinross and its many facilities. It is close to the M90 Motorway Junction with direct access to Dunfermline, Edinburgh, and Perth. Gairney Bank enjoys a regular bus service to Cowdenbeath via Kelty and to Perth via Kinross, Milnathort, Glenfarg, Aberargie, and Bridge of Earn. The closest rail station is at Cowdenbeath and this is accessible from Gairney Bank by bus. This station is on the Fife Circle linking directly to Dunfermline, Inverkeithing and Edinburgh.

1.7 As part of the development, particularly by the introduction of 2 sided development on the B996, the potential to introduce some traffic calming and to address problematic vehicle speeds through the village (the village's speed limit may be reduced) would arise. My clients' are fully prepared to look at solutions in this respect as part of the development and to assist in any funding required to deliver this.

1.8 The position of the site within a pipeline safeguarding zone is noted. Initial discussions with Transco –Scotland Gas Networks indicate that a stand-off distance for any property would be required. This matter will be further researched with that body in order to inform any development proposal. It does however appear at this stage that the Transco –Scotland Gas Networks requirements can be met in order to allow the site to be developed as set out above.

1.9 From initial enquiries it is understood that sufficient physical and social infrastructure (including school capacity) is available in order to serve the development and therefore there are no underlying infrastructure constraints that would preclude the development of this site. Drainage would be addressed by a new treatment plant fully in accordance with prevailing requirements related to the Loch Leven catchment.

1.10 It is clear from other representations made by my clients to the emerging local development plan that there is a requirement to allocate further effective housing land within the Kinross Housing Market Area. This is also in line with prevailing national policy and guidance as set out in Scottish Planning Policy and in Planning Advice Note 2/2010 "Affordable Housing and Housing Land Audits".

1.11 The subject site forms a viable/deliverable and justified extension to the existing village in a location that is easily accessible to local services and amenities. It reflects the extent of development opposite and would allow the related enhancement of the village edge by new structure planting (clearly improving the existing situation). It would also add a degree of flexibility and choice/variety of new housing within the area and be deliverable. For all of these reasons, the development would support the underlying requirements of the emerging local development plan.

2.0 CONCLUSIONS

2.1 Based on the assessment above there first requires to be an appropriate level of residential land allocation made within the Kinross HMA in order to meet identified needs, this allowing an appropriate level of development both within and outwith the main centres of population. The environmental case for failing to provide for the full needs of the Kinross HMA within this defined area is not substantiated. Failure to meet needs locally will at least partially undermine the commitment towards fully sustainable mixed and integrated communities underpinning current planning policy at local and national levels. It is considered that appropriate development within defined Landward settlements would be an appropriate approach to support existing communities.

2.2 The next consideration will be site specific allocations. The nature of the area will require a number of allocations in a variety of locations. It is important that these are of an appropriate form and location in order to secure the required community benefits and also to ensure that they are in fact fully effective and deliverable within the Local Development Plan timescale. As indicated much of the Kinross HMA is constrained by the Loch Leven catchment and by a designated AGLV. The subject site lies within the Loch Leven catchment but, as outlined, outwith the AGLV. In order to address the former, the development would accommodate new drainage provision for both the proposed and neighbouring properties which would be beneficial to this protected water body and therefore an environmental benefit would be achieved.

2.3 The location and scale of the site and its development form would fully respect the character of the village. It has been demonstrated that while comprising a village of limited scale Gairney Bank is fully accessible to its surroundings and is adequately served by public transport, including direct links to a rail station. In a Kinross-shire context it is a sustainable location for new development, development which would be fully deliverable and respect the built and natural environment to an appropriate degree.

2.4 For all of these reasons my clients' request the allocation of the subject site for residential purposes within the emerging Perth and Kinross Council Local Development Plan.

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

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

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

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 and Mrs A McLaren
Address and Postcode	c/o TMS Planning Limited, "Balclune", 32 Clune Road, Gowkhall
Telephone no.	[REDACTED]
Email address	[REDACTED]

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

2. Which document are you making a representation on?

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

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

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

Policy ref.	<input type="text"/>	or			
Site ref.	<input type="text"/>	or			
Chapter	<input type="text" value="7"/>	Page no.	<input type="text" value="198"/>	Paragraph no.	<input type="text" value="7.1.9"/>

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

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

The table in para 7.1.9 should be altered to detail the full HMA requirements and the figures in the columns altered to reflect the alteration to the Housing Market Requirement - this being increased from 880 to 980 units. In addition, Column D should be deleted and Column E altered to reflect the deletion of column D. Column E will then be increased by a further 90 units. In short, adjusting the Housing Land Requirement (Column A) to meet the full HMA requirement (980 units) and removing Column D increases the Additional Allocations Required in Column E to 1070 units - thereby requiring the allocation of additional sites in order to meet the land requirements.

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

The table and related list contained in paragraph 7.1.9 page 198 contains a section (Column D) where an assumption related to the contribution to be made to the effective housing land supply is made. This is set at 10% of the requirement (albeit the rationale for this particular level remains unclear). No matter the rationale for this it is clear from Planning Advice Note 2/2010 (paragraph 62) "Affordable Housing and Housing Land Audits" that Windfall sites should "only count towards meeting the housing land requirement once planning permission has been granted and it is considered to be effective or is being developed". The specific provision for a windfall allowance forming part of the effective land supply is therefore inappropriate and contrary to prevailing Scottish Planning Policy and advice.

The consequences of this approach are that a sufficient residential land allocation/supply, as per the clearly stated requirements underpinning Scottish Planning Policy, will not be provided and the local development plan will therefore fail to meet the underlying requirements of Scottish Planning Policy and of Tayplan.

As indicated, additional effective land allocations therefore require to be made through the local development plan process. In the Kinross Housing Market Area there is the opportunity to allocate a number of smaller, community based, allocations in order to assist delivery, to reflect environmental capacity, and to increase the range and choice of housing (location and types) within the area. Development within the Loch Leven catchment can also deliver environmental improvements (phosphorous reductions) where the requirements set out in proposed local development plan policy EP7 "Drainage within the Loch Leven catchment 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.

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 James Thomson
Address and Postcode	c/o TMS Planning Limited, "Balclune", 32 Clune Road, Gowkhall
Telephone no.	[REDACTED]
Email address	[REDACTED]

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

2. Which document are you making a representation on?

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

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

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

Policy ref.	<input type="text"/>	or			
Site ref.	<input type="text"/>	or			
Chapter	<input type="text" value="7"/>	Page no.	<input type="text" value="198"/>	Paragraph no.	<input type="text" value="7.1.9"/>

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

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

The table in para 7.1.9 should be altered to detail the full HMA requirements and the figures in the columns altered to reflect the alteration to the Housing Market Requirement - this being increased from 880 to 980 units. In addition, Column D should be deleted and Column E altered to reflect the deletion of column D. Column E will then be increased by a further 90 units. In short, adjusting the Housing Land Requirement (Column A) to meet the full HMA requirement (980 units) and removing Column D increases the Additional Allocations Required in Column E to 1070 units - thereby requiring the allocation of additional sites in order to meet the land requirements.

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

The table and related list contained in paragraph 7.1.9 page 198 contains a section (Column D) where an assumption related to the contribution to be made to the effective housing land supply is made. This is set at 10% of the requirement (albeit the rationale for this particular level remains unclear). No matter the rationale for this it is clear from Planning Advice Note 2/2010 (paragraph 62) "Affordable Housing and Housing Land Audits" that Windfall sites should "only count towards meeting the housing land requirement once planning permission has been granted and it is considered to be effective or is being developed". The specific provision for a windfall allowance forming part of the effective land supply is therefore inappropriate and contrary to prevailing Scottish Planning Policy and advice.

The consequences of this approach are that a sufficient residential land allocation/supply, as per the clearly stated requirements underpinning Scottish Planning Policy, will not be provided and the local development plan will therefore fail to meet the underlying requirements of Scottish Planning Policy and of Tayplan.

As indicated, additional effective land allocations therefore require to be made through the local development plan process. In the Kinross Housing Market Area there is the opportunity to allocate a number of smaller, community based, allocations in order to assist delivery, to reflect environmental capacity, and to increase the range and choice of housing (location and types) within the area. Settlements such as Scotlandwell are not constrained by infrastructure capacity and retain land with/adjacent to the settlement capable of beneficial development with no material environmental impacts. .

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.

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 Philip Sloan
Address and Postcode	c/o TMS Planning Limited, "Balclune", 32 Clune Road, Gowkhall
Telephone no.	[REDACTED]
Email address	[REDACTED]

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

2. Which document are you making a representation on?

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

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

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

Policy ref.	<input type="text"/>	or			
Site ref.	<input type="text"/>	or			
Chapter	<input type="text" value="5"/>	Page no.	<input type="text" value="69"/>	Paragraph no.	<input type="text" value="5.1.10"/>

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

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

The table in para 5.1.10 should be altered by the deletion of Column D. Column E should be altered to reflect the deletion of column D. Column E should be increased by a further 720 units to 4060 units.

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

It is clear from Planning Advice Note 2/2010 (paragraph 62) "Affordable Housing and Housing Land Audits" that Windfall sites should "only count towards meeting the housing land requirement once planning permission has been granted and it is considered to be effective or is being developed". The specific provision for a windfall allowance forming part of the effective land supply is therefore inappropriate and contrary to prevailing Scottish Planning Policy and advice.

The consequences of this approach are that a sufficient residential land allocation/supply, as per the clearly stated requirements underpinning Scottish Planning Policy, will not be provided and the local development plan will therefore fail to meet the underlying requirements of Scottish Planning Policy and of Tayplan.

As indicated, additional effective land allocations therefore require to be made through the local development plan process within the Perth Core Area, including Methven.

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

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

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

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

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

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 James Thomson
Address and Postcode	c/o TMS Planning Limited, "Balclune", 32 Clune Road, Gowkhall
Telephone no.	[REDACTED]
Email address	[REDACTED]

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

2. Which document are you making a representation on?

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

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

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

Policy ref.	<input type="text"/>	or			
Site ref.	<input type="text"/>	or			
Chapter	<input type="text" value="7"/>	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.

The subject site at Scotlandwell (see attachments) should be included in the local development plan for housing development and public open space.

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

See attached statement and plans.

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

Save a copy

Print

Submit

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

**PERTH AND KINROSS COUNCIL LOCAL
DEVELOPMENT PLAN**

**REPRESENTATION:- PROPOSED RESIDENTIAL
DEVELOPMENT AT SCOTLANDWELL**

SUBMISSION BY MR JAMES THOMSON

APRIL 2012

TMS PLANNING AND DEVELOPMENT SERVICES LIMITED

1.0 PROPOSED SITE/DEVELOPMENT

1.1 The statement supports the partial allocation of land adjacent to the western boundary of Scotlandwell (the subject site) for residential development through the emerging local development plan (see attached location plan and Sketch Proposals plan). The remainder of the site would comprise public open space and landscaping.

1.2 The proposal is not that the entire site would be developed for housing rather that part(s) of the site should be considered for such development in conjunction with the use/landscaping of the remainder of the site in order to satisfactorily address site constraints related to slope and also the relationship of the site to the Scotlandwell Conservation Area. The commencement of such a process is considered justified in light of physical relationship of the site to Scotlandwell, the requirement to identify additional housing land emerging through the Local Development Plan process, the potential for the provision of a fully linked and sustainable development commensurate with the scale and function of the village within the site and in light of the lack of environmental constraints (outwith Loch Leven catchment and the designated Area of Great Landscape Value (AGLV)). There is no doubt that the designated Conservation Area and its setting raise issues that require to be carefully considered. The existence of this designation should not be taken as an absolute prohibition on development as this is not a requirement of the statutory designation in the first place.

1.3 The site, circa 2 hectares, lies within the north-western part of the village and is bounded to the: -

North - by the A911 (embankment over much of its length);
South - by agricultural land;
East - by an existing residential curtilage and an area of land in limited use (the Conservation Area boundary); and,
West - by an area of agricultural land and the churchyard.

1.4 It is envisaged that the form of development on the site would be fully informed by its relationship to the Conservation Area. Key views to/from Scotlandwell, where required to maintain the character or appearance of the Conservation Area, would be retained by a well designed modest development set within the landscape/a landscape setting. Native planting, including specimen trees, would be provided as an integral part of the development. The development site would be accessed from the A911 through the neighbouring site and linked to the core of the village. The precise form of the properties and their layout would be established in full dialogue with Perth and Kinross Council and the local community. It is envisaged that this would be of a form reflecting the qualities of the designated Conservation Area in terms of design/ layout and external finishes. An indicative layout (Sketch Proposals plan) is attached detailing a courtyard style development of traditional form. An additional dwellinghouse

and stable block are also detailed in order to complete the development. The latter would, in effect, replace a large agricultural shed which presently has permission to be constructed on the site. This, it is suggested, would offer a more beneficial form of development and relate better visually to the village and to its Conservation Area.

1.5 The use/treatment of the residual area (shown as paddock and SUDs pond on the Sketch Proposals plan) would be provided as public open space with a footpath network linking through any development to the core of the village. This would allow direct connection between the church and the village and the formal curtilage of the former, and its landscape treatment and that of the village approach, to be enhanced.

2.0 ASSESSMENT

2.1 Delivering residential development on the subject site, albeit of a very modest scale, would contribute positively to housing delivery within the Kinross HMA and support for the local community. It represents a realistic development option on a fully effective site which, with the correct design solution, would be an asset to the village.

2.2 In brief, the site is directly adjacent to the built up area of Scotlandwell within the local plan designated settlement boundary and is well located/related to the village core. The Conservation Area Character Appraisal indicates certain key views across the site but unfortunately fails to explain the underlying value of these. It includes the subject site in the Conservation Area setting. The impact of any development on views/setting will require further assessment but this position does not, in principle, preclude the limited and sympathetic development of parts of the site in conjunction with related landscape/setting enhancements. The right form of development, respecting the Conservation Area and its setting, remains to be determined but it is considered that such sympathetic development could be achieved and therefore fully integrated with the existing village in terms of both form and function. Such development would represent a form of beneficial sustainable development supporting the local community and its needs (sustainable communities).

2.3 Scotlandwell falls outwith the Loch Leven catchment and the subject site is outwith and has no impact on the designated AGLV. In terms of the built environment, the site falls at the edge of the designated Conservation Area and its sympathetic development would have no negative material impact on the character or appearance of this area. An opportunity for enhancement may in fact arise.

2.4 Perth and Kinross Council Scotlandwell Conservation Area Appraisal (CAA) recognises that contextural new development which relates sympathetically with the traditional townscape should be promoted within the

Conservation Area. This equally should apply to the consideration of development abutting or within its setting. The CAA also promotes sympathetic development within, and the overall enhancement of, the designated Conservation Area. With this in mind and in conjunction with the provision of design guidance outlined and further assessment in partnership with Perth and Kinross Council and the local community it is considered that an appropriate form of beneficial development fully sympathetic to the character of the Conservation Area could be secured.

2.5 It is clear from other representations made by my clients to the emerging local development plan that there is a requirement to allocate further effective housing land within the Kinross Housing Market Area. This is also in line with prevailing national policy and guidance as set out in Scottish Planning Policy and in Planning Advice Note 2/2010 "Affordable Housing and Housing Land Audits".

2.6 The subject site forms a viable/deliverable and justified extension to the existing village in a location that is easily accessible to local services and amenities. It would also add a degree of flexibility and choice/variety of new housing within the area and be deliverable. For all of these reasons, the development would support the underlying requirements of the emerging local development plan.

2.7 From initial assessment it is understood that electricity, mains water and mains drainage are all readily available. Indeed, a search of Scottish Water Assets Capacity information shows significant availability for water (1800 units) and public drainage (866 units) in the Scotlandwell catchment area. Both primary and education capacity are also available to serve the development.

3.0 CONCLUSIONS

3.1 Based on the assessment above there first requires to be an appropriate level of residential land allocation made within the Kinross HMA in order to meet identified needs, this allowing an appropriate level of development both within and outwith the main centres of population. Failure to make sufficient provision for new residential development within the Kinross HMA within the local development plan will ultimately fail to address the development plan strategy, the requirements of national policy (SPP and PAN 2.2010), and, most significantly, fail to meet the needs of the area. The environmental case for failing to provide for the full needs of the Kinross HMA within this defined area is not substantiated. Failure to meet needs locally will at least partially undermine the commitment towards fully sustainable mixed and integrated communities underpinning current planning policy at local and national levels. It is considered that development in settlements outwith the Loch Leven catchment coupled with some limited development

within other Landward settlements would be an appropriate approach to support existing communities.

3.2 The next consideration will be site specific allocations. As indicated part of the Kinross HMA is constrained by the Loch Leven catchment and by a designated AGLV. The subject site is unaffected by these factors, lies within an established settlement, directly adjacent to the village core, and could be readily and beneficially utilised for a sympathetic and relatively small scale residential development. A sympathetic form of development guided by Design Guidance (as per the CAA) fully respecting the character of the Conservation Area and the village could be achieved. On this basis the allocation of the site would result in an effective and fully deliverable integrated and beneficial development supportive of the community, character and role of Scotlandwell, and fully integrated within the village with any impact on its landscape setting and the setting of the Conservation Area fully mitigated. It is accepted that further assessment is required in order to determine the extent/nature/form of any development and the use/treatment of the residual area. The indicative sketch proposals are a good starting point and detail the significant provision of public open space that would arise from the development in addition to the residential components. The whole proposal is integrated and would enhance the church's relationship to the core of the village and improve the setting of Scotlandwell.

3.3 For all of these reasons my client requests the allocation of the subject site for residential and related use (public open space) within the emerging local development plan.

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

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

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

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	Messrs A and J Bayne
Address and Postcode	c/o TMS Planning Limited, "Balclune", 32 Clune Road, Gowkhall
Telephone no.	[REDACTED]
Email address	[REDACTED]

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

2. Which document are you making a representation on?

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

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

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

Policy ref.	<input type="text"/>	or			
Site ref.	<input type="text"/>	or			
Chapter	<input type="text" value="7"/>	Page no.	<input type="text" value="216"/>	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.

The defined settlement boundary should be altered at the south in order to include the land subject to my client's representation. This represents a more logical and defensible boundary for the village. In addition, the additional area of land then included within the village boundary should be allocated for housing as per my client's representation.

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

Refer attached statement (1), plans (3) and photographs (4).

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

Save a copy

Print

Submit

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

**PERTH AND KINROSS COUNCIL LOCAL
DEVELOPMENT PLAN**

**REPRESENTATION:- PROPOSED RESIDENTIAL
DEVELOPMENT AT CLEISH**

SUBMISSION BY MESSRS A AND J BAYNE

APRIL 2012

TMS PLANNING AND DEVELOPMENT SERVICES LIMITED

1.0 PROPOSED SITE/DEVELOPMENT ASSESSMENT

1.1 This statement supports the allocation of land to the south of Cleish (the subject site) for residential and related development/use through the emerging local development plan.

1.2 The site, approximately 0.23 hectares in area, lies within the southern part of the village and comprises an area of agricultural land abutting existing built development. The site is bounded to the: -

North - by residential curtilages and Cleish Primary School playground;
South - by agricultural land;
East - an access road leading to the site from a junction on the main road; and,
West - by agricultural land.

1.3 The site largely sits to the rear of, and is screened by, other properties within the village. From the north the site is almost entirely screened while from the east existing vegetation and buildings only afford glimpse views of the site from sections of the main road on this approach to the village. The site is more visible, but not prominent, from the west albeit the form/nature of the development proposed will address this. More open views of the site arise from the farm road to the south of the site. The use of this route and the form of development proposed are considered to address any issues arising in this respect.

1.4 The form of development proposed is very much guided by the character of the existing village, including its Conservation Area status, and the commitment by my clients to provide some general benefit to the village as part of the proposals. The latter would comprise the gifting of a defined area of the site to Perth and Kinross Council in order that the overcrowded play ground at Cleish Primary School can be extended for the general benefit of this community school. An area of approximately 700m² is proposed for this purpose (Plan 1 Indicative Proposals refers). It is understood that this would be welcomed locally, hence it forms part of the proposals. In the event that this land was not required for a playground extension, following discussions with Perth and Kinross Council's Education Service, then the potential for up to 3 houses within the subject site would arise. This does not form the current submission/proposal but demonstrates that a viable option/alternative exists.

1.5 It is envisaged that the remaining site area would be developed for 2 dwellinghouses, potentially in the form outlined on attached Plan 1 (Indicative Proposals), with the final form, design, and appearance of the development devised fully in conjunction with Perth and Kinross Council and other relevant parties in order to ensure that the underlying character and appearance of the designated Conservation Area was preserved while facilitating beneficial development within the local community. Landscaping

to the southern site boundary would also be included as part of the development and would improve the setting of the village at this point. It is envisaged that a well related and fully integrated development form can be delivered.

1.6 Access to the site would be taken directly from the road which traverses the east site boundary. It is anticipated that this road will be upgraded as part of the development and the full extent of required works would be addressed at the relevant stage with Perth and Kinross Council's Roads Service.

1.7 It is noted that the site lies within the Loch Leven catchment. In light of the environmental issues related to drainage within this area development of the site would include the provision of modern foul drainage treatment arrangements which would allow connection from at least 1 existing property and thereby delivering the required mitigation. This would comply with the requirements of the Loch Leven Management Plan.

1.8 The proposals are outlined on a variety of plans and photomontages. Plan 1 details the site and outlines the component parts of the development. Plan 2 provides a representation of the "completed" development on the Ordnance Survey village plan and shows how this, on plan form, fits with the form/framework of Cleish. The following supporting information should also be referred to in order to gauge the likely form of development and its positive contribution to the character and appearance of the designated Cleish Conservation Area. This includes:

- A site layout plan with photographic viewpoints (1 to 4)
- Viewpoint 1 Photomontage
- Viewpoint 2 Photomontage
- Viewpoint 3 Photomontage
- Viewpoint 4 Photomontage

1.9 These plans and photographs provide a context for the form of development (the scale/layout etc of the properties) that could be provided within the site and the impacts of this form of development on selected viewpoints within the village. This clearly demonstrates that there would be no negative impacts on the Conservation Area and therefore that a form of beneficial development supporting the local community and adding to the choice/variety of housing within the area can be delivered. While it is accepted that further work on the precise form of development is required, it is considered that the location, scale and form of the development would fully respect the setting and form of the village and would satisfactorily address its Conservation Area status.

2.0 CONCLUSIONS

2.1 Based on the assessment above, and with respect to other representations made by my clients to the emerging local development plan, there first requires to be an appropriate level of residential land allocation made within the Kinross HMA in order to meet identified needs, this allowing an appropriate level of development both within and outwith the main centres of population. Failure through the local development plan process to make sufficient provision for new residential development within the Kinross HMA will undermine the development plan strategy for the area, the requirements of national policy, and, most significantly, fail to meet the needs of the area. The environmental case for failing to provide for the full needs of the Kinross HMA within this defined area is not substantiated. Failure to meet needs locally will at least partially undermine the commitment towards fully sustainable mixed and integrated communities underpinning current planning policy at local and national levels. It is considered that appropriate development within defined Landward settlements would be an appropriate approach to support existing communities, including Cleish.

2.2 The next consideration will be site specific allocations. The nature of the Kinross-shire area will require a number of allocations, often small scale allocations, in a variety of locations. It is important that these allocations are of an appropriate form and location in order to secure the required community benefits and also to ensure that they are in fact fully effective and deliverable within the local development plan timescale. The subject site lies within the Loch Leven catchment but, as outlined, this can be addressed as part of the development by appropriate mitigation fully in accordance with established policy within the Kinross Area Local Plan and also emerging policy within the local development plan (policy EP7).

2.3 The designated Cleish Conservation Area also represents a development constraint/opportunity. It is however considered that with careful design, potentially along the lines indicated on the supporting plans (as demonstrated by the related photomontages), a development fully befitting, respecting and potentially enhancing the Conservation Area could be delivered. It is clear from the plans and photomontages that the location, scale and form of the indicative development would effectively preserve the character of the Conservation Area and therefore in light of this, the potential for benefit to the local school and in the absence of other development options within Cleish, the subject site is the only realistic and logical development site.

2.4 Policy HE3A: "New Development" in the emerging local development plan states that: -

"There is a presumption in favour of development within a Conservation Area that preserves or enhances its character or

appearance. The design, materials, scale and siting of new development within a conservation area, and development outwith an area that will impact upon its special qualities should be appropriate to its appearance, character and setting”.

2.5 For the reasons already set out and reflected in the submitted plans and photographs, it is considered that this policy would be satisfied by the proposed scale/form of development. Therefore it is considered that the village boundary of Cleish should be altered at the south to include the subject site with the site also allocated for residential and related uses as per this representation.

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

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

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

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	Messrs A and J Bayne
Address and Postcode	c/o TMS Planning Limited, "Balclune", 32 Clune Road, Gowkhall
Telephone no.	[REDACTED]
Email address	[REDACTED]

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

2. Which document are you making a representation on?

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

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

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

Policy ref.	<input type="text"/>	or			
Site ref.	<input type="text"/>	or			
Chapter	<input type="text" value="7"/>	Page no.	<input type="text" value="198"/>	Paragraph no.	<input type="text" value="7.1.8 and 7.1.9"/>

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

4. What is your representation?

Are you supporting the Plan?

Or

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

The text in paragraph 7.1.8 should be altered to remove reference to the 10% housing reduction in the Kinross area. The table in para 7.1.9 should be altered to detail the full HMA requirements and the figures in the columns altered to reflect the alteration to the Housing Market Requirement - this being increased from 880 to 980 units.

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

See attached sheet

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

Save a copy

Print

Submit

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

PERTH AND KINROSS COUNCIL LOCAL DEVELOPMENT PLAN PROPOSED PLAN - REPRESENTATION TO PROPOSED PLAN

Page 198 of the Proposed Plan paragraph 7.1.8 states that "*TAYplan has identified that in order to accommodate projected population increases approximately 70 houses will be required per year. However, it is proposed to reduce this by 10% because of the significant adverse environmental impact on Loch Leven. If this lower build rate is to be achieved, the Local Development Plan will need to identify an effective housing land supply capable of delivering 880 houses*".

There are 2 issues arising from this approach.

Firstly, is there sufficient justification for the 10% reduction, the so called "*significant adverse environmental impact on Loch Leven*", and secondly, what are the related implications on the Kinross Housing Market Area and the communities therein of this approach. Tayplan does not require the redistribution of 10% of the housing requirement from the Kinross Housing Market Area it merely makes provision for such an occurrence where this can be fully justified "*in exceptional cases of environmental capacity*" – no such justification has been advanced by Perth and Kinross Council.

Despite the terms of the environmental report supporting the emerging local development plan, there remains no justification to relocate 10% of the identified housing requirement from the Kinross Housing Market Area to the Perth Housing Market Area. This approach is based largely on the perception that further development within the Kinross HMA would have negative environmental consequences for Loch Leven. While this is in reality a counterintuitive argument (for reasons set out below), even setting this to one side for the moment, it is clear that large areas of Kinross-shire, approximately 74% from the environmental report, has either no/few development constraints and/or has recognised development potential. Even within the Loch Leven catchment there are opportunities for beneficial community based allocations which will further help to address the environmental concerns (meet the 125% phosphorus mitigation) by removing/upgrading existing polluting septic tanks and providing new treatment facilities while at the same time helping to retain and support communities and increase the available supply of housing available. Such an approach also assists the local economy.

Moving housing provision away from the area it is required within has a potentially negative impact on the area and its residents in terms of meeting their legitimate housing needs and, in the case of the Kinross Housing Market Area, even in present economic conditions, helping to sustain the highest average house prices within the Perth and Kinross Council area. This does not assist the delivery of sustainable mixed communities. If you limit legitimately required development, in addition to not meeting need and inflating demand and therefore prices, how does the required affordable

housing get delivered? The proposal to divert the 10% of the Kinross requirement to the Perth Housing Market Area, an area itself with significant environmental constraints (including flooding) and where the delivery of much of the required development is significantly constrained by lack of available infrastructure, large scale individual allocations, and the need for substantial new investment, cannot presently be justified.

According to the Main Issues Report, transportation proposals in order to allow the delivery of the Perth Area Strategy will cost an estimated £80-100 million alone, that's before new drainage, schools and other required infrastructure investment is factored into the development costs. There also remain issues with land ownership related to at least some of the required infrastructure projects which will result in inevitable delays and increased costs – are they in fact deliverable within the local development plan timescale? It is noted that measures to deliver new infrastructure are being looked at (new models/funding mechanisms) but to date there are no solutions and therefore it appears that significant new development in the Perth Housing Market Area is itself constrained – why then would it be an appropriate response to divert development to this area from another which CAN provide for needs locally?

The temptation to restrict development in more “rural” areas (e.g. Kinross-shire) and to direct this to larger centres of population (as referred to above) will not necessarily deliver a more sustainable development form. Travel is a much more complicated matter than simply proximity and a more balanced/rounded assessment will be required. Failing to provide for new development within local areas may frustrate local indigenous expansion, result in population decline and potentially impact adversely on the local economy and local services. Sustainable growth in all communities should be the approach adopted. The local development plan should therefore plan for the full housing requirement to be met within the Kinross Housing Market Area and no 10% reduction should be planned for.

In terms of the specific Loch Leven drainage issue which appears to underpin the 10%, Perth and Kinross Council's approach is counterintuitive. Paragraph 7.1.2 page 197 states that: -

"The Loch Leven Catchment Management Plan produced in 1999, through a multi-agency collaborative project, sought to identify measures to reduce the phosphorus entering the Loch. Within the catchment area more rigorous policies have sought to ensure that new development does not add to the amount of phosphorus entering the Loch but contributes to achieving a net reduction. The principal aim of the Catchment Management Plan - to reduce the levels of phosphates entering Loch Leven - remains relevant today".

In short, this paragraph tells us that new development meeting more rigorous standards (the Kinross Area Local Plan policy seeks 125%

mitigation) remains relevant in assisting the recovery of Loch Leven by achieving net reductions in phosphorus within the catchment. New development is removing old polluting septic tanks and replacing these with new properly maintained treatment facilities with legally binding maintenance obligations through agreements under Section 75 of the Town and Country Planning (Scotland) Act and also monitored by the Scottish Environment Protection Agency. If the opportunity to deliver this form of development is removed then how are the phosphorus improvements to be delivered?

In addition, page 199 of the emerging local development plan related to "Housing within the Loch Leven Catchment" states at paragraph 7.1.15 that:

"The Loch Leven Catchment Area extends over much of Kinross-shire. Work has been undertaken over the last 30 years to reduce the input of phosphorus into the Loch. Although there have been signs of improvement in the Loch's condition, there is a continuing need to reduce both phosphorus and nitrogen inputs into the Loch. The aim therefore is to ensure that there is no increase of phosphorus in the Loch Leven Catchment arising from waste water associated with new developments. Within the Catchment Area, under Policy EP7, new development will be required to connect to a publicly maintained drainage system or provide mitigation measures capable of removing 125% of phosphorus likely to be generated by the development."

This again appears to recognise that new development within the catchment can assist the removal of phosphorus thus dispelling the underlying justification for the 10% relocation to the already significantly constrained Perth Housing Market Area. Indeed, such an approach further flies in the face of established Scottish Planning Policy wherein delivery is a key consideration. How can the additional housing required to meet the needs arising in the Kinross Housing Market Area realistically be delivered in another Housing Market Area, one which is clearly constrained in output terms and which fails to meet its own delivery requirements?

It therefore remains the case that that there is in fact no "significant adverse environmental impact on Loch Leven" of seeking to meet the full needs of the communities within the Kinross Housing Market Area within the defined area. The consequences of failing to make the required provision are entirely negative for the area, including the failure to provide affordable housing which is a major consideration in any area displaying the highest average housing process in the Perth and Kinross Council area. There is no justification either through Tayplan or in Scottish Planning Policy in order to justify the present response proposed by Perth and Kinross Council. The Kinross Housing Market Area should therefore contain residential allocations sufficient to meet the full identified needs of the catchment area.

The table on page 198 paragraph 7.1.9 should be amended to read under column A "980" units. It is also the case, refer separate representation, that

Column D related to "Windfall Sites should be deleted as these do not legitimately form part of the established land supply. Altering Column A and removing Column D results in an overall requirement in Column E "Additional allocations required" of 550 units rather than the 360 units presently detailed. In short land to deliver an additional 190 units is required within the local development plan period, this likely to require a further allocation of 230 units allowing 20% flexibility.

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	Scottish Gliding Union Ltd
Address and Postcode	Portmoak Airfield, by Scotlandwell, KY13 9JJ
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 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:

Airfield Safeguarding

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

Policy ref.	EP13	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.

as explained in the attachment

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

as explained in the attachment

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

Save a copy

Print

Submit

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



Scottish Gliding Centre

Portmoak Airfield, Scotlandwell, by Kinross, KY13 9JJ

website: www.scottishglidingcentre.co.uk

Mr Euan McLaughlin
 Planning Officer
 Perth & Kinross Council
 Pullar House
 35 Kinnoull Street
 Perth
 PH1 5GD

3rd April 2012

Your Ref: S13/2 EMCL

Dear Mr McLaughlin

Draft Airfield Safeguarding Policy and Supplementary Guidance for Perth and Kinross

I refer to my letter of 8th November 2011 and the revised Supplementary Guidance on airfield safeguarding dated December 2011. Thank you for taking into account the comments we made in November.

We have considered the revised wording of Policy EP13: Airfield Safeguarding in Section 3.11 "Environmental Protection and Public Safety". In order to accord with the principle of protection of public safety and to accord with the CAA's position on the rôle of airfield operators in assessing the impact of proposed developments, we suggest that the Policy should read as follows:

"Policy EP13: Airfield Safeguarding

Developments will be refused if they are likely to have an adverse impact on the safe operation of aircraft from, or on public safety in the vicinity of, the following airfields:

- *Perth Airport*
- *Portmoak Airfield*
- *Balado Airfield*
- *Strathallan Airfield*

Under Section 16(5) of the Civil Aviation Act 1982 the comments of the aerodrome management concerning the effect of certain development proposals must be carefully considered. The CAA considers that if an aerodrome operator advises that an airfield's established amenity would be affected by a development, that advice may be considered as expert testimony so far as the technical issues are concerned.

Applicants for planning consents within the safeguarding zones of these airfields (as defined in the Supplementary Guidance) should consult the airfield operator prior to submitting an application. The applicant may be required to obtain from the airfield operator an assessment of the impact on the safe operation of the existing facility.

Note: Supplementary Guidance will define the areas where consultations will take place and further expand the limitations of incompatible activities and navigational obstructions etc.”

In passing, we note that Errol and Dundee are included in the Supplementary Guidance, but not in the wording of Policy EP13.

It has also come to our attention that there is an error in our 8th November comment about the origin of the Obstacle Limitation Surface (comment 4). The normal touch-down point or threshold can, indeed, be taken to lie 40 metres into the airfield from a 2 metre high boundary. However, the origin of the 1:20 OLS should be 30 metres prior to this point for an Approach Surface OLS (CAP 168 Table 4.2 and Figure 4.10 refer). This intentionally builds in a safety margin. If the origin of the OLS were taken to be the actual threshold, aircraft could pass dangerously close to structures which only just fail to penetrate the OLS. You may wish to consult the report by Mr Hill in relation to planning application 07/00595/FUL for a worked example.

With kind regards,

Yours sincerely

Alec Stevenson
Airfield Safeguarding Officer
Scottish Gliding Union Ltd.

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	J J Gunnell
Address and Postcode	Kilmagadwood Farmhouse Scotlandwell KY13 9HY
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.	Scotlandwell and Kilmagadwood	or			
Chapter	7.17	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.

Redefine boundary to take into account planning decisions and guidance by the Reporter. These explicitly states that housing development at the top of this site, adjacent to the road in obtrusive and should not be permitted. See attached drawing.

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

A recent planning decision (not yet finalised) allowed 2 houses on this site. It is now necessary, via the Local Plan, to ensure that the objective of preventing further expansion is achieved. The attached drawing shows that the developer already has plans in place for a third house in the vacant top plot despite earlier applications being rejected at planning on appeal to the Reporter. The Reporter was very clear that this top house should not be allowed:

"The claim by planning officers that such a loss of view "is not a material planning consideration" is most untenable. These are not the views of households which are stake but the views of the passing public moving through an AGLV. They are important to the sense of local identity and landscape character which are the central concerns of local plan policy 5".

The correct way to protect this important site from further intrusive development is to define the settlement boundary as the land included in the two new houses but the top vacant plot should be returned to AGLV status, explicitly stating that further housing is not allowed.

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

Save a copy

Print

Submit

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

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

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	J J Gunnell
Address and Postcode	Kilmagadwood Farhhpouse Scotlandwell KY13 9HY
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 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.	Scotlandwell and Kilmagadwood	or			
Chapter	7.17	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.

Suggested change submitted by separate eMail.

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

I support the proposal to separate Kilmagadwood from Scotlandwell and create a separate settlement. The character of the hamlet of Kilmagadwood is quite different from that of Scotlandwell. Separating the two will inhibit ribbon development which might otherwise connect them.

Also, taking the farmland to the south west out of the settlement boundary is sensible. Development there would be entirely inappropriate.

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

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

submit your form you then have to send the email.

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	Gordon King
Address and Postcode	c/o Dr F Gilmour Viewfield, Meethill Road, Alyth, PH18 0E
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.	ALYTH SETTLEMENT	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.

INCLUDE OUR CLIENTS SITE IN ALYTH'S SETTLEMENT BOUNDARY + ZONE IT FOR RESIDENTIAL DEVELOPMENT.

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

SEE ENCLOSED.

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.

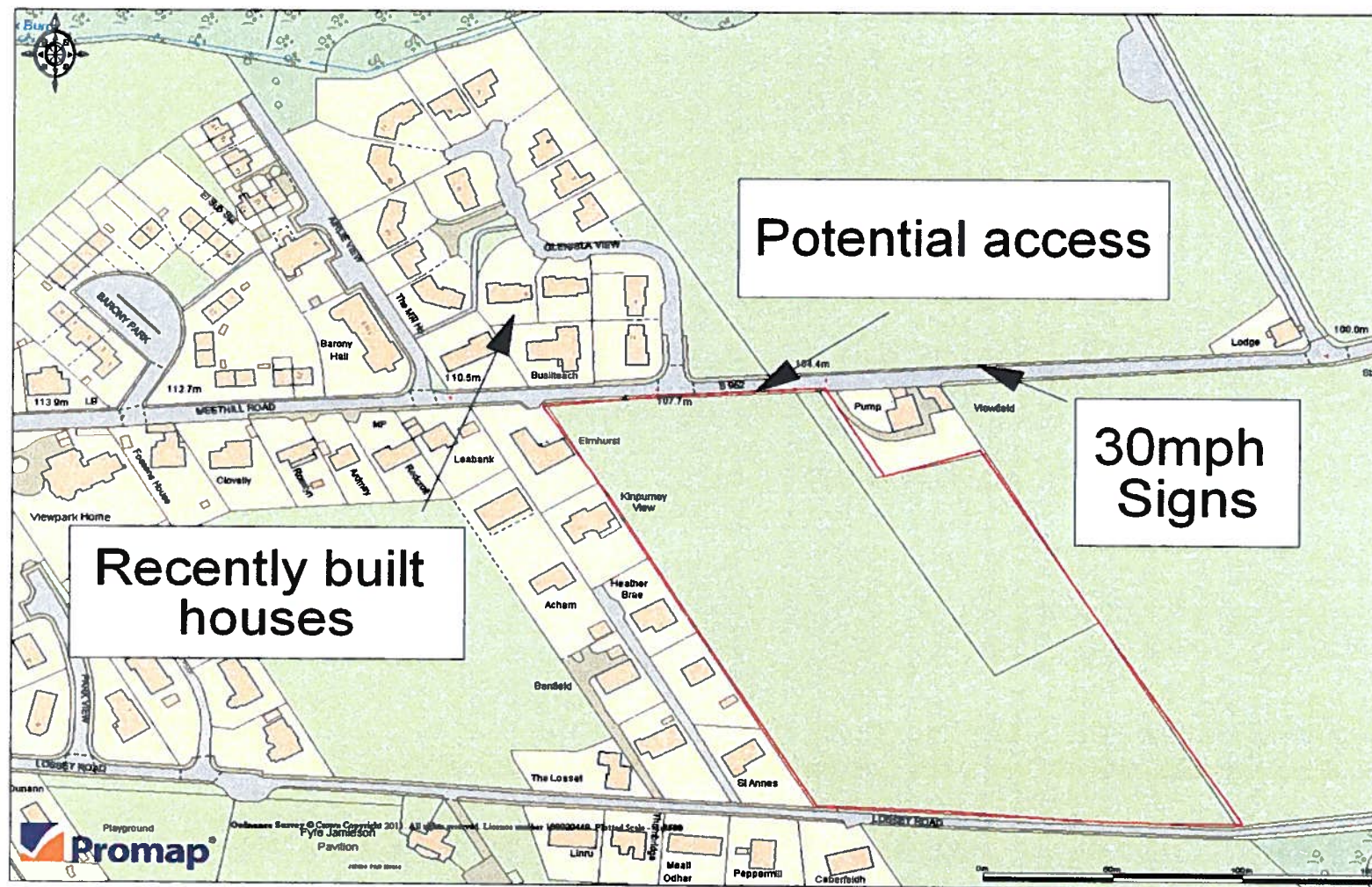
Save a copy

Print

Submit

To submit your form you then have to send the email

Map 2: Layout of site



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



02 April 2012

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

RECEIVED
 10 APR 2012

Our Ref: PKD/50/058

Dear Sir/Madam

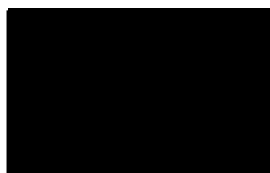
Residential Development to the West of New Alyth, Blairgowrie, Perthshire (Site Reference H61)

Please find enclosed a Representation Form in response to the publishing of the Perth & Kinross Council Local Development Plan (LDP) Proposed Plan (PP).

Our client; Mr Alastair Fleming owns the land which is zoned for Residential Development to the west of New Alyth (LPD site reference: H61).

My client welcomes and supports the Council's intention to construct 20 houses on this site and feels that it is a natural extension to the settlement. It is also a logical second phase to the first phase of the development - zoned in the previous Local Plan and comprising 10 houses. A number of the services, including the entrance/exit bellmouth onto the public road are already in place. Again, we can confirm that there are no issues with developing the site and development would be able to commence reasonably imminently. There has also been developer interest in the site, with the client currently in discussions with one particular developer.

If the Council has any questions – please do not hesitate to get in contact with us



DMH Baird Lumsden



Partner (of DM Hall LLP): Gordon King BSc FRICS
 Associate: Donald Yellowley BSc (Hons) MRICS
 Estate Agency Manager: Duncan Fergusson MNAEA

The Mill, Station Road
 Bridge of Allan, Stirling, FK9 4JS

www.dmhbl.co.uk

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	AUSTAIR FLEMING
Address and Postcode	C/O DMM BAIRD LINDEN, THE MILL, STATION ROAD, 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.	H62	or			
Chapter	9	Page no.	279 - 281	Paragraph no.	<input type="text"/>

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

Or

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

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

OUR CLIENT; MR ALESDAIR FLEMING OWNS THE
LAND WHICH IS ZONED FOR RESIDENTIAL
DEVELOPMENT AT NEW ALYTH (SITE H6J).

WE ARE IN SUPPORT OF THIS ZONING.
PLEASE REFER TO THE SUPPORTING LETTER.

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](#)

05 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

GORDON KING

Address and Postcode

c/o MR PETER TOP
THE GARDEN FLAT, 37a PRINCESS ROAD, LONDON
NW1 8SS

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.

SETTLEMENT BOUNDARY FOR PERTH.

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.

WE WOULD LIKE TO SEE OUR CLIENTS
SITE ZONED FOR RESIDENTIAL DEVELOPMENT.

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

SEE ENCLOSED.

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.

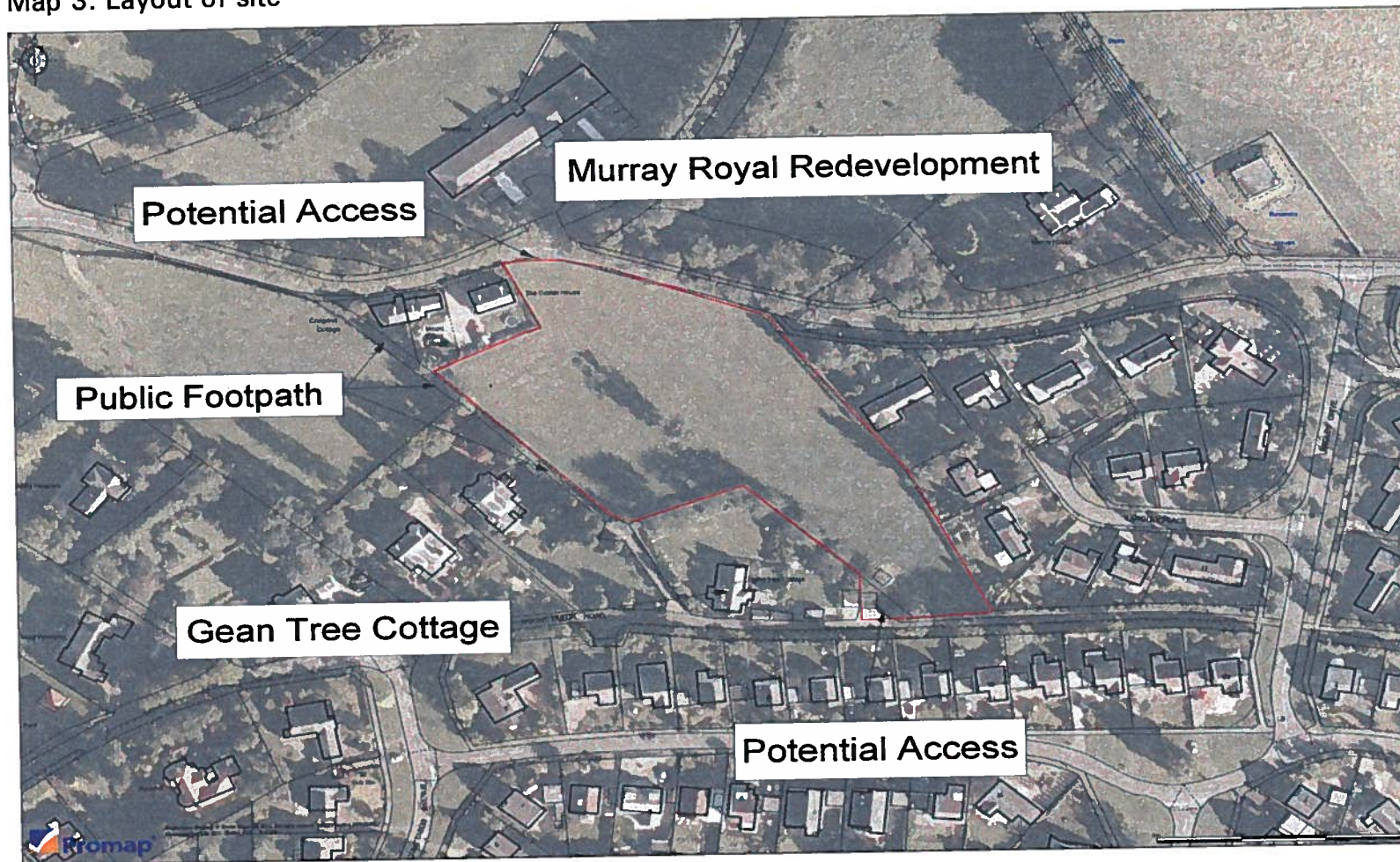
To submit your form you then have to send the email.

Save a copy

Print

Submit

Map 3: Layout of site



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

05 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

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. 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.

ABERNYTHY IDENTIFIED AND OUR
CLIENTS SITE ZONED FOR RESIDENTIAL
DEVELOPMENT.

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

SEE ENCLOSED

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

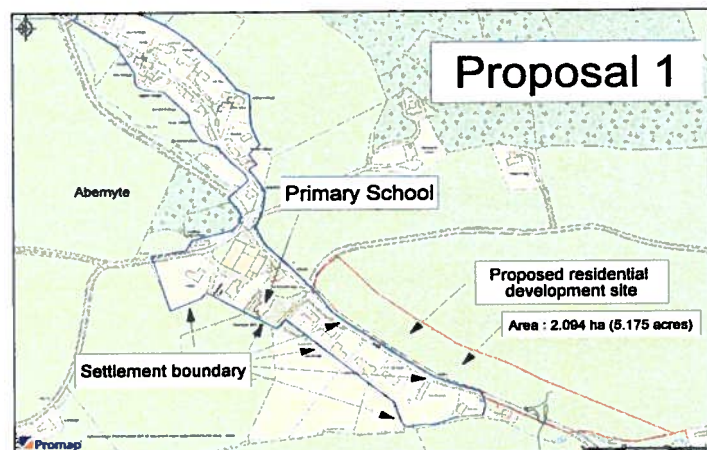
Print

Submit

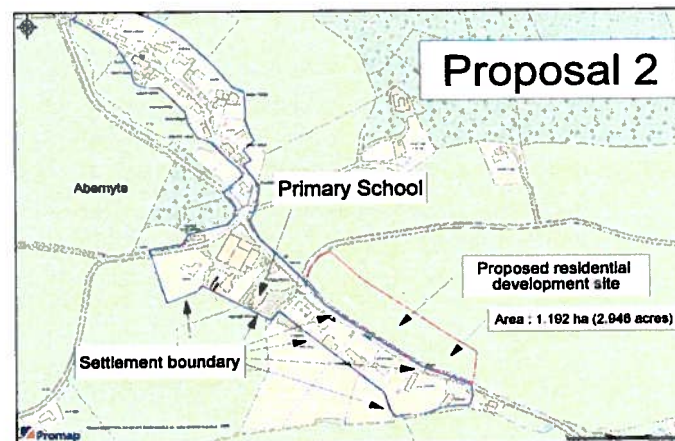
DEVELOPMENT PROPOSAL

It has been proposed in previous submissions that the settlement of Abernyte be extended into our client's field. The subject field appears to offer the only logical settlement extension opportunity. It is proposed that private and rental houses be constructed. Three Proposals have been forwarded:

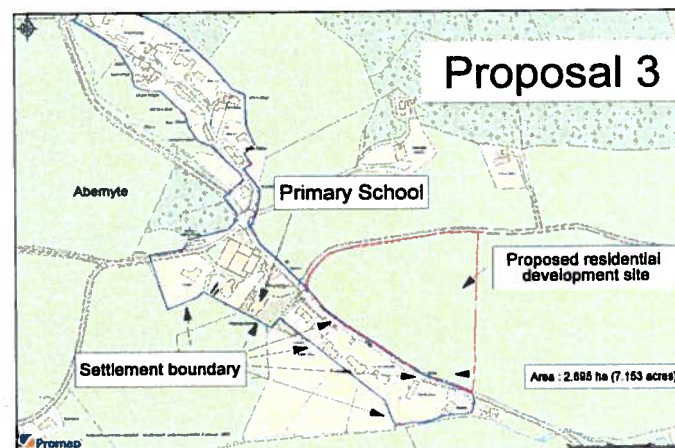
Map 2: Proposal 1 – Circa 15 houses



Map 3: Proposal 2 – Circa 10 houses



Map 4: Proposal 3 – Circa 15 houses



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

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

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. 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.

WE WOULD LIKE OUR CLIENTS SITE TO BE ZONED FOR MIXED USE DEVELOPMENT AS OPPOSED TO EMPLOYMENT USE.

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

SEE ENCLOSED

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.

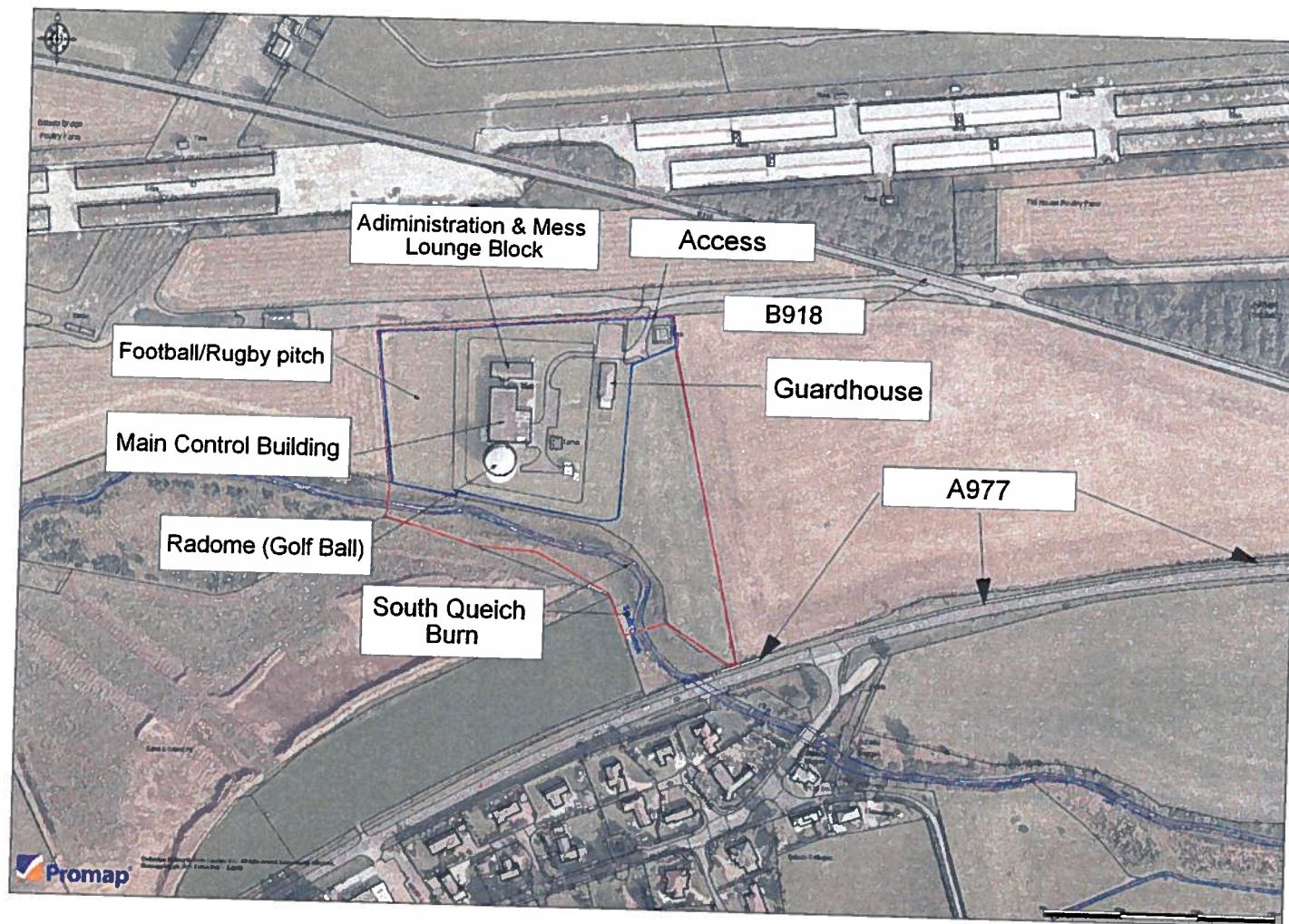
Save a copy

Print

Submit

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

Map 2: Layout of site



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

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

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

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 Gordon King
Address and Postcode	15 Awa Street Edinburgh EH2 4PH
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.	Housing Allocations	or			
Site ref.	Land at Dunning	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.

We propose the reinclusion of a natural extension to the village, first identified in the main (11)01 Report.

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

Please see attached Submission, and earlier submissions

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

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

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

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

From: Chris Gardner [REDACTED]
Sent: 28 May 2012 10:56
To: TES Development Plan - Generic Email Account
Subject: Land at adjacent to Latch Burn Wynd, Dunning - LDP Ref. 09142/6 Dunning
Follow Up Flag: Follow up
Flag Status: Red
Attachments: 4424_001.pdf

For the Attention of Alasdair Findlayson

Further to our recent discussions please find attached an amended proposed site boundary relative to the representations made by DMH Baird Lumsden in April 2012. As discussed, we feel it is important to provide some additional clarity on what is believed to be the realistic developable area of the site, taking into account the sites relationship with the existing settlement together existing topography and landscape features. The net developable area shown is approximately 2ha/5acres and as a result of the smaller site size we would anticipate a potential site capacity of 20-25 units, contrary to our previous submission.

We note that the site was identified in the Main Issues Paper as a potential housing site, which together with another site immediately adjacent to the site (Auchterarder Road), were considered to be capable of delivering approximately 50 units. However, unlike the adjacent site, our client's site was not allocated in the Proposed Plan. We feel that to achieve the target delivery of 50 units in Dunning over the Plan period it is important that both sites are allocated for housing growth. Firstly we do not believe that the site currently identified has capacity to deliver the project number of units at a density that would be appropriate for the existing settlement and as such additional land must be allocated. We believe that there is sufficient relationship between to the two sites to ensure a cohesive approach to the development of both sites.

Secondly, we feel that our client's site is a preferable site for development than the site at Auchterarder Road given its relationship with the existing settlement and the existence of an access point of Latch Burn Wynd which was specifically intended to serve future residential development on the site. Due to the site's relationship with the existing settlement and the topography of the site and surrounding area development on the area identified on the attached plan would have minimal visual impact and would be seen as a natural extension of the settlement boundary. As part of any development a robust scheme of landscape could be implemented that would mitigate the impact of the development and provide a robust and defensible settlement boundary.

Having discussed this matter with you, I trust you find this in order and look forward to receiving confirmation of receipt of this submission in due course.

Chris Gardner MRTPI
Head of Planning Consultancy

Baird Lumsden
Edinburgh and Bridge of Allan

[REDACTED]

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

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

Telephone no.

Email address

Note: email is our preferred method for contacting you. If you do not want 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. 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.

CLIENT'S SITE INCLUDED IN AUCHTERARDER'S SETTLEMENT BOUNDARY AND ZONED FOR RESIDENTIAL DEVELOPMENT OR MIXED USE.

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

SEE ENCLOSURES.

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

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

Save a copy

Print

Submit

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

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

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

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	Donald Riddell
Address and Postcode	Drumdewan Farmhouse Dull Aberfeldy PH152JQ
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.	6.12 Dull	or			
Chapter	6.12	Page no.	178	Paragraph no.	6.12

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.

inclusion of field to South East of Dull settlement boundary between Dull access road and Farm track and below Drumdewan Farmhouse.

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

We wish the field boundary to be included as a residential housing site in the local Development Plan. We believe this site is suitable because of the following reasons:

There is a strong demand for housing in the countryside and in particular this part of Highland Perthshire, with easy access to public transport and the local school and other amenity on offer in Aberfeldy.

This site sits adjacent to Highland Safaris which serves as an amenity store for the village and has become an important business with this area of the countryside. Development here will economically strengthen the business.

Highland Safaris is also an important and expanding business in this area of Highland Perthshire. There is an existing demand for staff, who require housing close by. Employees want to live close to their place of work which will also enhance the community of Dull having families living and working here.

The road to Dull is a natural boundary surrounding the field.

The field is low lying and with careful landscaping and sensitive planting the houses will be well screened from the main road.

Water and Power services are close to the site.

There is already an access from the village road into the field.

New houses in this site will not burden the upper village of Dull with more traffic but will allow sensitive development of village.

Save a copy

Print

Submit

From: Rob in Menzies [REDACTED]
Sent: 24 February 2012 14:18
To: TES Development Plan - Generic Email Account
Subject: Mains of Taymouth, Kennore
Follow Up Flag: Follow up
Flag Status: Red
Attachments: 555 masterplan OS.pdf

<<555 masterplan OS.pdf>>

Development Plan Highland Area, Kenmore.

I have attached a plan showing the extent of planning permission from PKC at Mains of Taymouth, Kenmore and should be included in the new plan as it is not up to date.

The areas concerned are;

Mains of Taymouth housing development. Western end of Mains of Taymouth.

Mains of Taymouth Quarry and landfill (Brown field) Eastern end of Mains of Taymouth

It is important that the plan is up to date and I trust you will recommend the changes.

Kind regards

Robin Menzies

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

Perth and Kinross Local Development Plan – Proposed Plan Representation Form
 Please read the notes below before completing this form. Completed forms should be returned to the Local Development Plans Team: DevelopmentPlan@pkc.gov.uk
 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 Debbie Mackay, Smiths Gore on behalf of Mr R. Marshall, Borlick Farm

Address and Postcode; Smiths Gore, 12 Bernard Street, Edinburgh, EH6 6PY

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: Yes

Supplementary Guidance:

SEA Environmental Report – Addendum 2:

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. **H36 Borlick, Aberfeldy**

or

Chapter

Page no.

Paragraph no.

4. What is your representation?

Are you supporting the Plan?

Or

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

My client would wish to express support for the allocation of H36 Borlick for residential purposes and E10 Borlick for general employment uses in the Proposed Plan.

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

The allocation of land at Borlick, Aberfeldy create a logical and appropriate continuation of existing housing development to ensure that the town, which plays a significant role as a service centre to Aberfeldy, has sufficient development land to accommodate its housing and employment needs into the future.

The land is free from any flood risk and has no environmental designations. The landowner is agreeable to releasing the land for development to assist in meeting the required settlement strategy.

SCONE PALACE AND ESTATE

List of Objections to Perth and Kinross Proposed Plan

No	Policy No.
	Policy
1	ED1A (d): Employment and Mixed Use Areas
2	ED1B: Employment uses in Mixed Use Areas
3	ED3: Rural Business & Diversification
4	ED5: Major Tourism Resorts
5	RC4: Retail & Commercial Leisure Proposals
6	RD3: Housing in the Countryside
7	RD4: Affordable Housing
8	RD6: Particular Needs Housing Accommodation
9	CF1B: Open Space within New Developments
10	HE2: Listed Buildings
11	NE4: Green Infrastructure
12	NE5: Green Belt
13	ER5: Prime Agricultural Land
14	Spatial Strategy 4.2.1 and 4.2.2 Re Small Settlements
15	Perth Area Spatial Strategy 5.1.15 (2) Transport Infrastructure
	Settlement Maps
16	Almondbank/Pitcairngreen and Cromwell Park
17	Scone – North Scone
18	Scone – Land to west of Spoutwells, North Scone
19	Guildtown
20	Pickstonhill
	Supplementary Planning Guidance
21	Housing in the Countryside
22	Affordable Housing Guide
23	Developer Contributions

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	Debbie Mackay, Smiths Gore on behalf of Scone Palace and Estate
Address and Postcode	Smiths Gore, 12 Bernard Street, Edinburgh, EH6 6PY
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.	ED1A: Employment and Mixed Use Areas	or			
Site ref.		or			
Chapter	3	Page no.	25	Paragraph no.	N/A

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 1: "Areas identified for employment uses" should be more carefully defined.

Proposed Change 2: Criteria (d) should be altered to allow flexibility in relation to appropriate retail opportunities.

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

This objection forms part of a suite of objections to the Proposed Plan, aimed at achieving a more positive and supportive policy context to enable Scone Palace and Estate to survive and grow, thereby securing its future and key contribution to Perthshire and Scotland's tourism offer and economy. A core document has been produced and submitted as supporting information in relation to these objections.

Proposed Change 1: It is not clear whether this is purely relating to employment areas as allocated in the plan, or to any existing and proposed employment areas.

Proposed Change 2: There may be a good reason to have a retail outlet which is contributing to e.g. the tourism offer within an employment area such as a craft workshop cluster. These should not be unreasonably restrained.

The core document setting out the Vision Statement for Scone Palace and Estate demonstrates that there will be a necessity for a range of mixed uses in locations such as the Walled Garden and the Sawmill site and the Palace Stables to support the development of a complementary visitor attraction including gardens, restaurant, plant sales, visitor/tourism related retail opportunities. The Palace Stables can offer a catering, retail and other visitor facilities as a new entrance facility to the Palace. The various policies in the plan must be flexible enough to allow these type of mixed facilities to come forward and support the sustainability of the Palace and assist in meeting the vision set out in the core document relating to this objection.

Save a copy

Print

Submit

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

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

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	Debbie Mackay, Smiths Gore on behalf of Scone Palace and Estate
Address and Postcode	Smiths Gore, 12 Bernard Street, Edinburgh, EH6 6PY
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 ED5: Major Tourism Resorts	or			
Site ref.		or			
Chapter	3	Page no.	28	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.

- 1) The term "Major Tourism Resorts" should be defined.
- 2) Scone Palace should be listed as one of the "significant resort complexes which plays a significant role in the local, national and international tourism economy" and supportive policies should be put in place to enable it to survive.

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

This objection forms part of a suite of objections to the Proposed Plan, aimed at achieving a more positive and supportive policy context to enable Scone Palace and Estate to survive and grow, thereby securing its future and key contribution to Perthshire and Scotland's tourism offer and economy. A core document has been produced and submitted as supporting information in relation to these objections.

1) Policy ED5 deals with, but does not define, Major Tourism Resorts. It lists a small number of these resorts and singles them out for special attention in the LDP. It may be that this policy deals with those resorts which provide bed spaces. However this is not clear in the text.

2) The choice of resorts appears rather arbitrary and it excludes one of Perthshire's premier tourist attraction, Scone Place and Gardens. The special attention and promotion should also be provided to Scone Palace in order to support its key role and to find ways of enabling it to survive and grow. Scone Palace and Estate provide a significant input to the local economy (see sections 4 and Appendix 9.2 of the accompanying supporting document.) but face continual challenges to their sustainability and ability to continue to offer access to this hugely significant part of Scotland's history.

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

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

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

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	Debbie Mackay, Smiths Gore on behalf of Scone Palace and Estate
Address and Postcode	Smiths Gore, 12 Bernard Street, Edinburgh, EH6 6PY
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.	ED3 Rural Business and Diversification	or			
Site ref.		or			
Chapter	3. Policies	Page no.	26	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.

This policy should be altered as follows;

- 1) Criteria (f) should be changed to state: "Outwith settlement centres, retailing will only be acceptable if it can be demonstrated that it is either, ancillary to the main use of the site and would not be deemed to prejudice the vitality of existing retail centres in adjacent settlements, or is providing a niche, destination, retailing experience which supports the tourism/visitor offer of Perth and Kinross.
- 2) The third paragraph of Policy ED3 requires clarification and a more explicit expression of support for rural housing associated with businesses and enabling housing should be provided.

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

This objection forms part of a suite of objections to the Proposed Plan, aimed at achieving a more positive and supportive policy context to enable Scone Palace and Estate to survive and grow, thereby securing its future and key contribution to Perthshire and Scotland's tourism offer and economy. A core document has been produced and submitted as supporting information in relation to these objections.

1) Policy ED3 should explicitly provide support for destination, niche retailing which is critical to supporting the tourism offer of Perth and Kinross such as the House of Bruar experience. Such retailing frequently offers a specific visitor experience or is complementary to, and an intrinsic part of, other visitor attractions. They are rarely offering any kind of competition to existing centres whose retail offer is of a very different nature. It is vital that the LDP is in line with the requirements of the economic policies in SPP, particularly paragraph 45,

"45. Authorities should respond to the diverse needs and locational requirements of different sectors and sizes of businesses and take a flexible approach to ensure that changing circumstances can be accommodated and new economic opportunities realised. Removing unnecessary planning barriers to business development and providing scope for expansion and growth is essential.

The planning system should support economic development in all areas by:

- taking account of the economic benefits of proposed development in development plans and development management decisions,
- promoting development in sustainable locations, particularly in terms of accessibility,
- promoting regeneration and the full and appropriate use of land, buildings and infrastructure,
- supporting development which will provide new employment opportunities and enhance local competitiveness, and
- promoting the integration of employment generation opportunities with supporting infrastructure and housing development.

The planning system should also be responsive and sufficiently flexible to accommodate the requirements of inward investment and growing indigenous firms."

The change proposed would help to remove any "unnecessary planning barriers" as specified in SPP paragraph 45.

2) Third paragraph deals with "proposals whose viability requires some mainstream residential development " but refers to "where this fits with the Plan's policies". It is not clear what is meant by this and to which housing policies they are referring. Therefore the policy position is completely unclear. Housing of this type has a key role to play in either ensuring a business can function by providing a necessary on-site presence, or by providing a source of capital which can support the viability of rural businesses. There should therefore be positive support for such proposals and this policy should be more explicit in its support.

Save a copy

Print

Submit

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

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

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	Debbie Mackay, Smiths Gore on behalf of Scone Estates
Address and Postcode	Smiths Gore, 12 Bernard Street Edinburgh, EH6 6PY
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.	ED1B Employment and Mixed Use Areas	or			
Site ref.		or			
Chapter	3. Policies	Page no.	25	Paragraph no.	n/a

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

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

The list of uses allowed within mixed use areas should include an element of retailing.

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

This objection forms part of a suite of objections to the Proposed Plan, aimed at achieving a more positive and supportive policy context to enable Scone Palace and Estate to survive and grow, thereby securing its future and key contribution to Perthshire and Scotland's tourism offer and economy. A core document has been produced and submitted as supporting information in relation to these objections.

It is important to provide sufficient retail outlets close to where people live to reduce the need to travel. This can be managed carefully to avoid impact on existing centres.

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

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

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

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	Debbie Mackay, Smiths Gore on behalf of Scone Palace and Estate
Address and Postcode	Smiths Gore, 12 Bernard Street, Edinburgh, EH6 6PY
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.	RC4: Retail and Commercial Leisure Proposals	or			
Site ref.		or			
Chapter	3	Page no.	30	Paragraph no.	

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

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

Policy RC4 paragraph 4, which begins "Proposals on edge of centre or out of centre locations will only be acceptable where.." should be adapted to continue " they offer a type of niche, destination retail which supports the tourism/visitor offer of Perth and Kinross and an out-of-centre location is required because of its specific locational significance to the proposal or because the proposal is in connection with an existing or proposed rural or tourism business.

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

This objection forms part of a suite of objections to the Proposed Plan, aimed at achieving a more positive and supportive policy context to enable Scone Palace and Estate to survive and grow, thereby securing its future and key contribution to Perthshire and Scotland's tourism offer and economy. A core document has been produced and submitted as supporting information in relation to these objections.

Policy RC4 does not allow for niche retail opportunities which present no threat to the functioning of existing centres because their offer is specific to the tourism/visitor market and/or they are required to support an existing or proposed rural or tourism business. This additional statement mentioned above is designed to enable the policy to provide for specific situations where a retail offer is critical to the viability of the wider business or creates an attraction which supports the overall tourism offer of Perthshire.

The SPP requires Planning Authorities to adhere to the sequential approach when dealing with applications for retail outlets. Paragraph 62 states that; "The sequential approach should be used when selecting locations for all retail and commercial leisure uses unless the development plan identifies an exception". It is therefore important that this exception is clearly stated in the LDP.

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

Perth and Kinross Local Development Plan – Proposed Plan Representation Form

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

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 Debbie Mackay, Smiths Gore on behalf of Scone Palace and Estate

Address and Postcode; Smiths Gore, 12 Bernard Street, Edinburgh, EH6 6PY

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: **Yes**

Supplementary Guidance:

SEA Environmental Report – Addendum 2:

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. **HE2 Listed Buildings**

Site ref.

or

Chapter

Page no. **Page 38**

Paragraph no.

4. What is your representation?

Are you supporting the Plan?

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

This policy should go on to state that:

“There is support for new uses to keep listed buildings in active use”

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

This objection forms part of a suite of objections to the Proposed Plan, aimed at achieving a more positive and supportive policy context to enable Scone Palace and Estate to survive and grow, thereby securing its future and key contribution to Perthshire and Scotland's tourism offer and economy. A core document has been produced and submitted as supporting information in relation to these objections.

It is vital that new uses are found for redundant traditional buildings of historic merit in order to ensure that they survive and adapt. There should therefore be positive support for such proposals and this policy should be more explicit in its support. The core document setting out the Vision Statement for Scone Palace and Estate demonstrates that there will be a necessity for a range of mixed uses in locations of historic interest or involving listed buildings such as the Walled Garden and the Sawmill site and the Palace Stables to support the development of a complementary visitor attraction including gardens, restaurant, plant sales, visitor/tourism related retail opportunities. The Palace Stables can offer a catering, retail and other visitor facilities as a new entrance facility to the Palace. The various policies in the plan must be flexible enough to allow these type of mixed facilities to come forward.

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 Debbie Mackay, Smiths Gore on behalf of Scone Palace and Estate

Address and Postcode; Smiths Gore, 12 Bernard Street, Edinburgh, EH6 6PY

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: **Yes**

Supplementary Guidance:

SEA Environmental Report – Addendum 2:

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. **Policy NE4 Green Infrastructure**

or

Site ref.

or

Chapter

Page no. **Page 43**

Paragraph no.

4. What is your representation?

Are you supporting the Plan?

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

The policy should include "rural enterprises" in the list of uses in criteria (c) so that the policy states:

"Development will contribute to the creation, protection, enhancement and management of green infrastructure by the:...

(c) Protection of the countryside from inappropriate development whilst supporting its positive use for agriculture, recreation, biodiversity, health, education, tourism, and rural enterprises."

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

This objection forms part of a suite of objections to the Proposed Plan, aimed at achieving a more positive and supportive policy context to enable Scone Palace and Estate to survive and grow, thereby securing its future and key contribution to Perthshire and Scotland's tourism offer and economy. A core document has been produced and submitted as supporting information in relation to these objections.

It is vital that the LDP provides support for rural enterprises and removes any "unnecessary planning barriers" (SPP para 45). The countryside should not be seen merely as a playground to be protected but as a vital living being that requires many levels of activity in order to remain sustainable on all levels.

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 Debbie Mackay, Smiths Gore on behalf of Scone Palace and Estate

Address and Postcode; Smiths Gore, 12 Bernard Street, Edinburgh, EH6 6PY

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: **Yes**

Supplementary Guidance:

SEA Environmental Report – Addendum 2:

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.: **NE5 Green Belt**

or

Site ref or

Chapter

Page no.

Page 44

Paragraph no.

4. What is your representation?

Are you supporting the Plan?

Or

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

Scone Estate promotes 4 options for the treatment of the Green Belt proposal with preferences for either Option 1 or Option 4:

Option 1: Complete Removal Of Proposed Green Belt Designation

The policy and plan are completely removed from the Local Development Plan

Option 2: Alterations to the Green Belt Boundaries

If (1) is not accepted, that the boundaries of the Green Belt be altered as follows:

2.1 Completely withdrawn from the Scone Palace Designed Landscape;

2.2 Withdrawn from the site to the west of North Scone as shown in the Core Document;

2.3 Withdrawn from the site known as Pickstonhill to the south of scone as proposed in the Core Document;

2.4 Withdrawn from the area to the east of Pitcairngreen.

Option 3: Alterations to the Green Belt Policy Wording

If (1) and (2) are not accepted, the policy wording is altered to state that development will only be permitted where:

It provides a new business opportunity or supports an existing one, or,

It utilises and regenerates a rural brownfield site

It fits within the landscape in a way which does not detrimentally affect the setting of Perth.

It Fits within the following selected Housing in the Countryside Policy criteria;

Building Groups

Infill Sites

New Houses: in existing walled gardens; relocated from an area of flood risk; or needed in relation to an economic activity

Renovation or replacement of houses

Conversion or replacement of redundant non-domestic buildings

Rural Brownfield Land.

Option 4: Scone Palace and Estate Masterplan Supplementary Planning Guidance

A further and preferred option is for the LDP to create a special designation for Scone Palace and Estate which explicitly supports the Masterplan as a management tool for the long term protection, enhancement and financial and environmental sustainability of the national resource. This approach would involve the creation of a specific Scone Palace and Estate Masterplan, Supplementary Planning Guidance document which would be developed in full participation with Perth and Kinross Council, other key stakeholders and in consultation with the community. This document would set out a clear agenda for the protection of the key attributes of the Palace and Estate, including its contribution to the setting of Perth, while planning carefully for vital new enterprises and development critical to the long term sustainability of the Palace and Estate.

The actual boundaries and extent of the Masterplan SPG area could be defined in partnership with the Council as part of the development of this proposed document.

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

This objection forms part of a suite of objections to the Proposed Plan, aimed at achieving a more positive and supportive policy context to enable Scone Palace and Estate to survive and grow, thereby securing its future and key contribution to Perthshire and Scotland's tourism offer and economy. A core document has been produced and submitted as supporting information in relation to these objections. The reasons for the objection to the Green Belt proposal are set out below in an extract from this document.

Strategic Appraisal of the Green Belt and Landscape Policies

Proposed Green Belt Policy

Perth and Kinross has set out in its Proposed Plan a new policy and plan for the creation of a Green Belt surrounding Perth and a number of settlements in its hinterland. The principle of a Green Belt policy for Perth, together with the proposed boundaries of the designation and the wording of the policy, are all the subject of an objection to the Proposed Plan by Scone Palace and Estates. This objection sets out the background to the policy and presents a critique of this approach, explaining why the Estates object strongly to this proposal.

Description of the Green Belt Area

The inner boundary of the Green Belt forms a tight edge to the city around the south and east of Perth. To the west it expands beyond the city edge as far west as Huntingtower, and to the north beyond Bertha Loch. The outer boundary extends to form a "Green Belt" of between 2 and 8 km around the city area. The settlements of Pitcairngreen, Cromwellpark, Bridgend and Gannochy, and Walnut Grove are specifically excluded but the Green Belt is drawn tightly around their urban limits. Scone is also excluded but with the Green Belt drawn beyond the urban limit to the east and north to allow for future growth. The Green Belt contains a wide variety of landscape character areas, from the wooded hills of Kinoull and Deuchny to the east, the lowland Firth landscape around the Tay, the policy landscapes close to Scone and the Lowland Hills to the west.

A Review of Green Belt Policy

Green Belt policy is set out at a national, regional and local level. A review of Green Belt policy at all levels highlights the following points:

1. Scottish Planning Policy

Scottish Planning Policy, the SPP, is a material consideration within the planning process. It overarches all planning policy within Scotland. It identifies the objectives of designation a Green Belt within Local Development Plans as being:

- i. In order to direct planned growth to the most appropriate locations and to support regeneration;
- ii. To protect and enhance the quality, character, landscape setting and identity of towns and cities;
- iii. To protect and give access to open space within and around towns and cities

The policy is clear that Green Belts should be used to direct development to suitable locations and not to prevent development from happening; for example if a town or city has a distinct character that could be damaged through unplanned growth the use of the Green Belt designation together with relevant policies could manage the growth more effectively.

The SPP goes on to state that land should only be designated as Green Belt when it contributes toward the settlement strategy and should not be used to protect natural heritage assets. **Most settlements will not have nor need Green Belts as other policies or designations will provide the appropriate context for decision making.** Green Belts need not necessarily encircle settlements but can take the form of buffers, corridors or wedges. Critically it states that:

"Green Belt designation can be used to prevent the coalescence of settlements; however there may be

circumstances where coalescence would create a more sustainable settlement pattern.”

Other points to consider from the SPP, relevant within the context of the Perth Green Belt are as follows:

- Green Belt boundaries should not be too tightly drawn, allowing for future planned development including smaller communities being allowed to grow
- Existing settlements should be excluded from Green Belt designations in Development Plans
- Development within a designated Green Belt should be of a high quality and appropriate scale and form
- The SPP demonstrates that, once a Green Belt is in place, it is intended to exercise significant control over developments. It states that Local Planning Authorities are to avoid eroding the integrity of the Green Belt through granting individual planning permissions
- The SPP states that certain types and scales of development (para 163) may be appropriate within a Green Belt and goes on to give a list of examples of development types which “may” include:
 - development associated with agriculture, including re-use of historic agricultural buildings;
 - woodland and forestry;
 - horticulture, including market gardening and directly connected retailing;
 - recreational uses compatible with an agricultural or natural setting;
 - essential infrastructure such as electronic communications
- An effectively managed Green Belt can be an important resource for the countryside, providing opportunities for outdoor recreation, education, tourism, protecting and enhancing biodiversity, landscape and the historic environment.

Other policies in the SPP are relevant to the consideration of whether a Green Belt is an appropriate planning tool in Perthshire. Paragraph 45 under Economic Development states that:

“Authorities should respond to the diverse needs and locational requirements of different sectors and sizes of businesses and take a flexible approach to ensure that changing circumstances can be accommodated and new economic opportunities realised.

Critically it goes on to state that:

“Removing unnecessary planning barriers to business development and providing scope for expansion and growth is essential. The planning system should support economic development in all areas by:

- taking account of the economic benefits of proposed development in development plans and development management decisions,
- promoting development in sustainable locations, particularly in terms of accessibility,
- promoting regeneration and the full and appropriate use of land, buildings and infrastructure,
- supporting development which will provide new employment opportunities and enhance local competitiveness, and
- promoting the integration of employment generation opportunities with supporting infrastructure and housing development.

The planning system should also be responsive and sufficiently flexible to accommodate the requirements of inward investment and growing indigenous firms.

Paragraph 47 emphasises that the **tourism industry** is one of Scotland’s largest business sectors and states that planning authorities should support high quality tourism related development, including the provision of appropriate facilities in key locations across urban and rural Scotland.

In relation to Rural Development, the SPP states in para. 93 that:

“Developments which provide employment or community benefits should be encouraged, particularly where they involve the imaginative and sensitive re-use of previously used land and buildings.”

Planning authorities are required to respond to the specific circumstances in an area whilst reflecting the overarching aim of supporting diversification and growth of the rural economy (para 93).

2. TAYplan

The provisions made within the strategic plan, TAYplan, are also material in considering Green Belt policy for Perth and its environs.

The role of the Green Belt, functioning as a TAYplan asset, is seen as

Preserving the setting, views and special character of Perth: including the historic core

To assist in safeguarding the countryside from encroachment

To manage long term planned growth including infrastructure

Define appropriate forms of development within the Green Belt based on the SPP

The Perth Green Belt should sustain the identity of Scone and provide land for planned development around key villages and settlements

3. Perth and Kinross Proposed LDP

Green Belt policy within the proposed LDP is contained within Chapter 3.9, the Natural Environment, and is Policy NE5. Within the Green Belt, development will only be permitted where:

It can be demonstrated that the development is essential for agriculture, horticulture (including allotments) or forestry operations that are appropriate to the Green Belt; or

It constitutes woodlands or forestry, including community woodlands

It constitutes uses which advance the Council's aims of improving public access to the countryside around Perth and are appropriate to the character of the Green Belt including recreational, educational and outdoor sports development including modest related buildings located and designed not to detract from the Green Belt

Alterations, extensions and change of use must not detract from the Green Belt and change of use to residential is only permitted where the building is of suitable architectural quality

Essential infrastructure must demonstrate that a Green Belt location is required

All development within the Green Belt must mitigate adverse impact on the character of the Green Belt.

In addition to this:

The Housing in the Countryside Policy does not apply

The Council will prepare SPG in partnership with landowners and others that forms a management plan for the Green Belt with the aim of developing:

-A sustainable rural economy

-Increased recreational use

- Landscape enhancement
- Improved path networks
- Green network linkages

Within section 5.0 (Perth Area Spatial Strategy) of the LDP the Perth Area Spatial Strategy sets out further Council aspirations for the Perth Green Belt;

“A Green Belt shall be designated to manage long-term growth, preserve the setting, views and special character of Perth and sustain the separate identity of Scone.”

Furthermore, an objective of Green Belt policy will be to;

“...strictly control the spread of built development, increase the area’s use for leisure and recreational purposes, particularly for managed public access, and facilitate the creation of green corridors with improved biodiversity.”

Green Belt Background Papers

1. The SEA process

The Council is required to carry out a Strategic Environmental Assessment of the proposed Local Development Plan. PKC have prepared Environmental Reports with addendums: a complex sequence of documents. Landscape was one of the key topic areas examined. From this document and of relevance to this representation are the following points:

Balancing the desire to grow the tourism sector and safeguard the special characteristics of landscapes which attract tourists to the area is seen as a challenge

Will the Plan ...respect landscape capacity, visual amenity, and the spatial diversity of communities?

Landscape is assessed as having a major relationship with environment and moderate with social and economic factors.

A separate SEA has been carried out on Perth’s Transport future including the proposed bridge crossing. This constitutes one of the biggest infrastructure projects proposed within the LDP, a new crossing over the Tay to relieve congestion and air pollution within the city centre, at a cost of around £120 million.

Three routes were assessed. Route Corridor C is identified as having significant adverse impact on cultural heritage and the designed landscape of Scone Palace, with no mitigation strategy agreed with Historic Scotland. Despite this, the route is selected as preferred within the proposed LDP.

2. Perth Green Belt Study and Perth Capacity Study

These two documents were both prepared by David Tyldesley Associates on behalf of SNH and Perth and Kinross Council. The Green Belt Study was done in June 2000 and the Perth Capacity Study in 2001. These documents, in particular the Green Belt Study, have informed the identification of the Green Belt boundary as defined within the Proposed LDP.

The document is available to view, with some difficulty, through Scottish Natural Heritage. The accompanying plans which formed part of the original study are not published with the document. The document is not available to view as part of the proposed LDP background papers.

The Green Belt Study was written nearly 12 years ago. At that time that this study was written, Perth had no Green Belt but was surrounded by an Area of Great Landscape Value making up the gaps left by the Historic and Designed Landscapes (including Scone Palace) which lie within proximity of the city and were not included within the AGLV. The role of the Green Belt was subtly different (SDD Circular 24/1985 Development in the Countryside

and Greenbelts, as amended by NPPG 14; now replaced by the SPP) and was as follows:

- (i) To maintain the identity of towns by establishing a clear definition of their physical boundaries and preventing coalescence
- (ii) To provide countryside for recreation or institutional purposes of various kinds
- (iii) To maintain the landscape setting of towns

The consultants then establish seven criterion to justify whether a Green Belt is required around Perth all of which support the establishment of the Green Belt except for the role in ensuring the new development is directed to brownfield land rather than green, on the basis that Perth has little brownfield land.

The study then concludes that the supporting document "Perth Landscape Capacity Study" 2001 provides a clear basis for drawing the Green Belt boundary. The proposed inner boundary is drawn using physical features such as roads, tracks, woodland urban edges. The outer boundary is drawn using largely physical features, with a preference for roads, lanes and tracks; field boundaries have been avoided as much as possible and only at south-east of Methven are topographical features used to define the edge.

Aspects of this document which are of relevance to the Scone Estate and to this objection are outlined as follows. They are discussed further within the Analysis and Conclusions sections below:

Section reference	Points of Note
5.3 Within "Boundaries"	"Towns and villages within Green Belts should be given scope to develop via infilling, the use of derelict or unused land and development of peripheral land, again where there would be no harm to Green Belt objectives"
6.2 Within Criterion 2	"The designed landscape of Old Scone (<i>sic: Scone Palace</i>)....are important areas for informal countryside recreation also offering excellent views of the city and beyond. They are well managed and Green Belt designation would add nothing to the management of these areas."
6.3 Within Criterion 3	"Other settlements within the vicinity of Perth are extremely vulnerable to inappropriate development damaging their high quality relationships with the landscape including ...Pitcairngreen..."
6.6 Within Criterion 5	"..at Perth, the AGLV appears to be designated solely or primarily to protect the setting of the city"
6.12 Within Criterion 6 but also referring to the Landscape Capacity Study section pp39 to 41	"The Landscape Capacity Study identified all of the land between New Scone and Gannochy, except for that which is Scone Palace Historic Garden and Designed Landscape, as having potential for development, in landscape terms. It is considered that much of this area could be omitted from the Green Belt so as to be available for development, if and when considered by the planning authority to be appropriate on other planning grounds. However the prevention of coalescence is an important Green Belt objective so a part of the gap is included in the Green Belt to secure the physical separation of New Scone from Gannochy. The part of the gap which is included, at Pickstonhill, has the character of open countryside, forms the setting of New Scone and is visually related to New Scone rather than Gannochy."
6.19	Reference is made to a "wider" outer boundary which secures protection of, amongst others Stormontfield, Balbeggie and Forgandenny. None of these are included within the proposed Green Belt as shown on the LDP.
7.3 Opportunities for enhancement	"In terms of recreational provision, the designed landscape of Old Scone(<i>sic: Scone Palace</i>) ...are important areas for informal countryside recreation also offering excellent views...They are well managed and do not need a countryside management/ recreation initiative to enhance public access. Green Belt designation is unlikely to add anything to the management of these"
8.4 Summary and Conclusions	Whilst the countryside around Perth is not generally in need of enhancement or management initiatives, there is scope for a Green Belt to

	contribute to or accelerate the improvement of access and countryside recreation west of the city.
--	--

Other Landscape Designations

1. National Scenic Areas

National Scenic Areas (NSAs) is the national statutory landscape designation for outstanding landscapes of scenic value as established most recently by the Town and Country Planning (National Scenic Areas)(Scotland)Designations Directives 2010. Perth and Kinross have five National Scenic Areas. None of these are within the area around Perth which is the subject of this representation.

2. Special Landscape Areas

Special Landscape Areas recently replaced Areas of Great Landscape Value (AGLV) as set out within NPPG 14 and the 1997 Review of Natural Scenic Areas undertaken by Scottish Natural Heritage, and guidance prepared by SNH and Historic Scotland. This is a non-statutory designation which protects scenic value and distinctiveness. SLAs are intended to underpin the NSAs and are intended as consistent in their approach across Scotland. Perth has no proposed SLAs. There was a previous AGLV designation around the city which is now Green Belt.

3. Historic Gardens and Designed Landscapes

Gardens and designed landscapes are “grounds that are consciously laid out for artistic effect” (Scottish Historic Environment Policy Designation July 2009). Historic Scotland hold the Inventory of Gardens and designed Landscapes in Scotland. This is a non-statutory designation but requires sites of national importance to be included. In reality this designation carries significant weight with Historic Scotland as a key consultee on any development proposals affecting them. Scone Palace was included on the Inventory in 1987 and covers 904.9 Ha. A site included in the Inventory is assessed for its condition and integrity and for its level of importance. The criteria are work of art, historical, horticultural/arboricultural/silvicultural, architectural, scenic and nature conservation values. For the first four, Scone Palace scores as “outstanding”, for the latter three it scores “high”. In summary it is;

“One of the Scotland's finest and oldest designed landscapes, showing the work of several different designers, and containing the category A listed Scone Palace. The pinetum contains specimen trees grown from seed collected by David Douglas”.

Critique of the Proposed Perth Green Belt

The sections above have described the proposed Perth Green Belt, and set out the policy context, (national, regional and local) within which the current proposal for a Green Belt sits. They also explore the methodology used to establish the Perth Green Belt. In this section, a critique is presented of this proposed policy including the justification for it, the methodology used to develop the policy, and its boundaries, its size, its boundaries and the policy wording proposed to accompany the map base.

Justification for Green Belt

1. National Context

Green Belt policy has subtly shifted in emphasis since publication of SPP, offering a more pragmatic approach to how we view our Green Belts. SPP clearly states in para 159 that Green Belt designation should be used to direct development to suitable locations, not to prevent development from happening. They are to have roles in supporting countryside access, regeneration and enhancing the quality and identity of our towns. The emphasis is more on character and less on drawing a tight physical boundary. The SPP is clear that this is not a Natural Heritage designation.

The counterbalance to the Green Belt is the strong emphasis in SPP on policies supporting growth. Clearly the SPP promotes a strong growth agenda and requires Local Planning Authorities to create policies supportive of that

agenda. SPP is particularly clear in para 45 that removing unnecessary planning barriers to business development and providing scope for expansion and growth is essential.

The case for a Green Belt around Perth and its hinterland remains largely unproven. The imposition of this unwieldy planning instrument clearly falls within the category of an “**unnecessary planning barrier**”. The effectiveness of Green Belts has long been questioned across the UK and nationally there is a move away from this type of policy.

There are many other devices available to the Planning Authority to effectively manage development without needing to resort to a Green Belt. A strong spatial strategy which allocates generous amounts of land, including a range of sites which have low infrastructure costs as well as the larger strategic development sites, should be a strong protection against erosion of the setting of Perth. Also, Housing in the Countryside policies can be used effectively to both promote and manage development in the rural hinterland. Other designations of key landscape assets such as National Scenic Areas, Special Landscape Areas and Gardens and Designed Landscapes can be used very effectively to protect these assets.

Indeed the Perth Landscape Capacity Study 2001, states in paragraph 7.3 that “Green Belt designation is unlikely to add anything to the management of these” meaning the designed landscape of Old Scone including Scone Palace.

It is clear that the implications of this designation have not been clearly thought through and it is equally clear that the policy does not achieve a suitable balance between the protection of the quality, character, landscape setting and identity of settlements and the need to support the economy and local businesses. The Core Document accompanying this and the other Scone objections seeks to demonstrate the types of highly beneficial development that would be thwarted should the policy come into being. Elsewhere in this document, a clear long term strategy for the sustainability of Scone and critically of Scone Palace and Grounds is articulated. Some of the key components of that strategy which would be negatively effected by this designation are discussed below in the light of the proposed Green Belt boundaries.

2. Boundaries and Extent of Proposed Green Belt

The extent of the Green Belt designation is not fully justified by the information made available. It covers around 10 283 hectares and is 10.4.miles from east to west and 7.4 miles from north to south. Perth City itself only covers 1 780 hectares. One of the stated aims in both Tayplan and the Proposed Plan is to protect the setting, views and special character of Perth. So the extent of land in Green Belt and therefore providing its “setting” is out of all proportion to its size. No strategic assessment of views which should be protected appears to have been made. No clear and robust analysis of the topography and landscape has been undertaken to assist in specifically defining scenic quality and the “setting of Perth”. Instead a blanket policy has been applied which simply replaces the AGLV with Green Belt albeit tweaked on the basis of the capacity study.

3. Western Boundaries and Pitcairngreen.

The boundaries stretch to the extreme west of Perth, as far as land several miles to the West of Pitcairngreen and indeed encompassing the village of Pitcairngreen. The boundaries are drawn tightly round the settlement so as to leave minimal room for expansion. There is a small area of land to the west of the village which is undeveloped but within the village boundary. However it is known to be only suitable for low density development. Scone Estates has been promoting a small area of land to the east of Pitcairngreen to the rear of Bridgeton farmhouse and steading complex, which would provide a small proportionate area of land for development which would allow the village the “room for expansion” required for smaller settlements by SPP para 162. This site is examined more closely within the Core document. There is a strong physical and visual barrier between Pitcairngreen and Perth made up of a combination of topography and mature trees and woodland.

4. Eastern Boundaries.

The Green Belt boundaries stretch across land on the east bank of the Tay as far north as Lethendy.

The desire to “sustain the identity of Scone” (Policy 3 Tayplan) is stated as one of the aims of the Green Belt.

However this protection can just as easily be afforded by the use of a settlement boundary which restricts growth in certain areas and allows development in others. The boundaries are drawn tightly to the southern boundary of the village in an area known as **Pickstonhill** allowing no scope for expansion in this location. However, there is scope for a new southern boundary of substantial tree belt to be put in place, providing a limited area of expansion which could then provide a more defensible and attractive boundary to the southern edge of Scone that would establish a green framework and allow for other community uses as well as housing.

The proposed Green Belt boundary has absorbed a relatively small area of well enclosed **land to the north of Scone** and adjacent to the North Scone (Spoutwells and New Mains) sites. This field is well enclosed on three sides and would offer a sensible area of expansion of the North Scone site in due course. It should therefore be left out of the Green Belt.

The Green Belt boundaries include the **Scone Palace Designed Landscape** which is clearly well protected at present and which is noted in the Perth Landscape Capacity Study 2001 as being “well managed and do not need a countryside management/recreation initiative to enhance public access. Green Belt designation is unlikely to add anything to the management of these.” Scone Palace and its hinterland is a major visitor attraction for Perth and indeed Scotland. Its historic significance cannot be over-stated. However, if this attraction and national treasure is to remain available to the public, it must receive sustained investment over time and in order to do so, additional facilities must be developed to complement its offer and attract sufficient funds to ensure its long term sustainability. A number of high quality and well located development opportunities have been identified and are detailed within the core document, which would contribute significantly to the sustainability of the Palace. However, these opportunities will either not be possible (walled garden and sawmill site) or be severely restricted (Palace Stables and Balboughty Farm Steading complex) if the Proposed Plan Green Belt policy and boundaries are adopted.

The **Walled Garden** covers an area of 2.13 hectares. It is adjacent to the A93 but is well hidden among the mature trees of the designed landscape. It is no longer used for its original purpose and is largely an area of informal grazing. Its proximity to the A93 makes it a suitable opportunity for sympathetic regeneration as a niche retail and catering destination adding significantly to the Palace offer. The Green Belt designation and policy would mean that any planning application for this proposal would have to be refused.

The **old sawmill** site adjacent to the Walled Garden, is no longer used as an active sawmill and is now a large area (0.66 hectares) of hard standing adjacent to the A93. This site has the potential to be developed as part of the Walled Garden destination garden, catering and retail offer. Under the Green Belt policy, such a proposal would not receive planning support.

The designation covers **Perth Racecourse** which is a significant business and visitor attraction. The scope for it to expand on its current site will be severely restricted by the Green Belt designation. This is a clear illustration of the lack of understanding of the implications of the Green Belt for the Perth area which has resulted in this misguided policy.

Balboughty Farmhouse and steading complex is covered by the proposed Green Belt boundaries. This listed complex offers considerable opportunity for conversion to high quality housing. However, the complex includes a large amount of hard standing and abandoned sheds or “rural brownfield” land which currently, under the Housing in the Countryside policy, would allow sensitive redevelopment complementary to the planned conversions. Under the Green Belt policy, only the conversion of the existing buildings will be allowed. This will severely restrict the ability to bring forward flexible development proposals which allow appropriate and necessary new buildings to complement the offer of the existing buildings. The conversion of traditional buildings such as these is very expensive and therefore will need to be cross-subsidised by new buildings, possibly including some new houses. Under the Green Belt policy, this will not be allowed.

It is clear that the range of development opportunities above would not be allowed under this Green Belt policy. It is equally clear that these unintended negative impacts of the Green Belt are not understood or appreciated by those promoting this policy.

Methodology

The methodology for PKC designating the Green Belt boundary has not been transparent and the reports on which this designation purports to be based are largely out of date. Whilst reference has been made by the Council to the Tyldesley report it is clear that the recommendations within that report have not been adopted wholesale nor does there appear to have been any update to that work which was carried out over a decade ago. This is despite significant changes in National Planning Policy, as listed above, changes to how we attribute quality to our landscapes, and changes to the economic climate and how that may be influencing our environment. This compares poorly with significant work which has gone on elsewhere for example the City of Edinburgh where the recent Green Belt appraisal suite of documents has led to:

- the establishment of a robust Green Belt;
- the re-assessment of the AGLV status into identification of 22 Special Landscape Areas; and
- assessment of capacity for development within the weakest Landscape Character Areas;

all of which has informed their Main Issues Report.

PKC has no such rigorous assessment and has consistently confused scenic value with Green Belt protection. Applying protection for scenic value is not the same as the function of the Green Belt, as set out within SPP.

Impact on the local and wider economy is an important consideration of any development plan and the significance of the relationship between scenic quality and the economy at both local and national levels does not appear to have been fully explored in this Proposed Plan. It is extraordinary that out of three routes explored for the new Tay crossing, the one chosen as the preferred route almost bisects one of Scotland's most historic cultural sites and irrevocably damages one of the country's finest designed landscapes whilst the Green Belt policy creates an unnecessary planning barrier to sympathetic economic development proposals which are vital to the sustainability of the national treasure which is Scone Palace.

In addition to this there is no recognition of the fragility of landscape management. Indeed there seems complacency about this: it does not however remain static and hence can easily and rapidly change the perception of the landscape. The Landscape Capacity Study states:

“In terms of recreational provision, the designed landscape of Old Scone (*sic: Scone Palace*) ...are important areas for informal countryside recreation also offering excellent views...They are well managed and do not need a countryside management/ recreation initiative to enhance public access. Green Belt designation is unlikely to add anything to the management of these”

While the comments are positive in relation to the management of the designed landscape – it must be clearly recognised that the management of this landscape requires considerable resources which can only continue to be provided if the Palace and Estate are economically sustainable. The great concern is that the imposition of the Green Belt designation will remove all scope for the business to develop new complementary enterprises and developments which will be absolutely vital to its survival. The Green Belt proposal together with the proposal to use the route for the Cross Tay Link Road which comes closest to the Palace, cuts through the Designed Landscape, and divides one of the Estate's key farms in two, could prove a disastrous combination for the protection of the setting of the Palace and its ability to adapt to ever changing and challenging market conditions.

Landscape capacity is defined within PAN 44 as being a function of topography ie landform and groundcover vegetation. The capacity route chosen has focussed clearly instead on built features such as roads. In an undulating landscape capacity assessed locally using landform and the interplay with vegetation can be very different. The Green Belt is very restrictive in how it has been applied, not allowing for local opportunities that will enable some growth of smaller settlements though a more detailed review of capacity. This particularly applies to some of the smaller settlements such as Pitcairngreen, where a Green Belt blanket has been applied restricting any form of growth whether new development or localised regeneration.

Economic Impact

AN economic impact study has been undertaken into Scone Palace and Estates and forms part of the Core Document. Some of its conclusions are summarised below.

Scone Palace will not be able to keep investing without support from Perth and Kinross planning policy.

In the absence of any serious investment and “refresh” in what the Estate offers in terms of tourism the Scone Palace income generated from the on-site visitor activity will continue to decline. The decline in income will be followed by a reduction in visitor numbers and the on-set of a spiral of decline. This decline will necessarily take place over a timescale of between 5 and 7 years but will result in a considerably reduced attraction.

Assuming that there is no investment in the visitor experience at Scone Palace it would not be unusual for visitor numbers to reduce by 5% per annum. Over 5 years visitor numbers would reduce to some 70,000 and over 7 years to some 60,000. With these levels of visitation the major events including the Game Fair and the Rewind Festival would become the more significant visitor activity at Scone Palace.

This forecast reduction in visitor numbers would reduce the economic impact by 42% over the levels indicated in the current dynamic scenario. The added difficulty with such a severe reduction in visitor numbers is that it would seriously challenge the viability and sustainability of the operation of Scone Palace as a visitor attraction. Significant operational and organisational changes would be required and there can be no guarantee that these would allow the visitor operation to achieve financial viability. In the absence of a financially viable operation the continuation of Scone Palace as a visitor attraction in the manner that it operates today would be in severe doubt.

The remainder of the Estate would continue to provide employment but the wider economic benefits are more limited than the visitor related activity. The loss of a key part of Perthshire’s tourism infrastructure would have implications for the local tourism economy with the potential for gradual reduction in economic impact and potential termination of visitor related economic activity with the exception of events such as the Fairs and Festivals.

The imposition of the Green Belt restrictions on key Palace and Estate development opportunities as outlined above, will seriously, perhaps terminally damage the Palace’s ability to survive as a visitor attraction.

Policy Wording

While the boundaries of the proposed Green Belt are poorly thought through and applied, the wording of the policy is hugely restrictive. It sticks rigidly to the examples of the types of development which may be appropriate in the Green Belt as set out in SPP but does not apply these carefully to the local Perthshire context.

The policy specifically precludes the application of the Perth and Kinross Housing in the Countryside Policy in this area. In doing so, it also precludes opportunities to regenerate areas which could benefit from new housing development and which are only likely to be capable of regeneration if the financial returns from the construction of new housing are possible.

The policy notes go on to state that Supplementary Planning Guidance will be developed which will provide a management plan for the Green Belt with the aim of developing;

- A sustainable rural economy
- Increased recreational usage
- Landscape enhancement where appropriate
- Improved path network providing links to the wider countryside
- Links to relevant Green networks within settlements

There is a clear contradiction between the creation of a Green Belt with its stifling impact of the rural economy surrounding Perth and this stated aim of achieving a “sustainable rural economy” within the Green Belt.

The stipulation in the Proposed Plan that the Housing in the Countryside policy does not apply in the Green Belt area is a particular concern. The policies in the Housing in the Countryside Policy and Supplementary Planning Guidance (Dec 2011) provide a limited number of useful opportunities to (as the policy states) “*encourage sustainable development in rural areas*” and “*safeguard the character of the countryside; support the viability of communities; meet development needs in appropriate locations; and ensure that high standards of siting and design are achieved*” Surely all of these objectives are just as applicable to the Green Belt as they are to the wider Perth countryside?

The Housing in the Countryside policy supports proposals for the “Erection or creation through conversion, of single houses and groups of houses in the countryside which fall into at least one of the following categories”:

- Building Groups
- Infill sites
- New houses in the open countryside on defined categories of sites including: existing gardens on a country estate and in walled gardens; relocation from flood risk zones; houses for key workers associated with an economic activity; new country estate houses of outstanding architectural quality and new designed landscape; houses for local people; Pilot projects for eco-homes;
- Renovation or replacement of houses
- Conversion or replacement of redundant non-domestic buildings
- Development on rural brownfield land.

The withdrawal of this policy from the proposed Green Belt area will remove some key opportunities to enhance the area covered. The Housing in the Countryside Policy creates limited but useful scope for new build in rural areas in very restricted situations. The impact on the proposed Green Belt of this policy would be minimal and its embargo makes an already restrictive policy even more inflexible.

Categories (1) and (2) provide some scope for **infill within existing small building groups**. The restrictions applied in the policy are such that this type of development can be strictly controlled. There is therefore no necessity to exclude these aspects of the policy from the Green Belt.

Category (3) **New Houses in the Open Countryside** provides limited opportunities which again should not create any particular issues for the Green Belt. By their very nature the “Existing Gardens” criteria 3.1 (a), suggests an existing suitable setting for a house and restricts it to situations where “development would not fundamentally affect the qualities and integrity of the site.” This restriction combined with the “All Proposals” criteria and the “Siting” criteria in the policy should easily be sufficient to provide the necessary quality of proposals to protect the setting of Perth.

The “**Walled Garden**” category (3.1 (b) by its very nature will have no impact on the wider landscape as development will be contained within high walls. Indeed it is completely contrary to afford this opportunity to assist in the preservation of the walls of such gardens outwith the Green Belt while not allowing this opportunity within the Green Belt.

Category 3.2 deals with the relocation of houses away from **Flood Risk** areas. Given that so much of the Green Belt adjoins the Tay river valley, and may be affected by flood risk, it would seem contrary not to allow this aspect of the policy to apply.

Category 3.3 deals with **houses required in relation to economic activities**. It again appears contrary to the need for sustainable rural development to refuse to allow scope for such proposals in the area around Perth covered by the proposed Green Belt. Many new rural businesses are more likely to thrive if they are in location close to centres of population. The Green Belt designation (based on the restrictions on economic activities and on accompany housing in the Green Belt policy) pushes such business opportunities outwith Perth’s immediate hinterland therefore reduces the opportunity for shorter travel distances and ease of access to a key market place.

Category 3.5 **Pilot projects creating eco-friendly houses** is an attractive and forward-thinking policy which it would be unfortunate to loose from the area covered by the proposed Green Belt. However, it is less critical a loss than other categories.

Category 4 **Renovation or replacement of houses including vacant or abandoned houses** is an important positive policy which can assist in making the countryside more attractive and creates a careful use of existing resources by bringing abandoned houses into use. Again it seems illogical not to allow this policy in the rural hinterland of Perth.

While aspects of category 5 **Conversion** are allowed under the proposed Green Belt policy, the replacement of redundant non-domestic buildings does not appear to be acceptable. This does not make sense in respect of the

stated objectives of the Green Belt designation – “to preserve the setting, views and special character of Perth”. Such buildings may be in a ruinous condition and past the ability to be repaired but may offer a suitable location for redevelopment. The existence of ruinous buildings in the hinterland of Perth will not enhance the city’s setting. The Green Belt designation in its current form will therefore work actively against the environmental improvement of the setting of Perth,

Category 6, **Rural Brownfield Land** is geared towards removing dereliction and gaining a significant environmental improvement on sites formerly occupied by buildings by allowing a small-scale development of up to 5 houses. The removal of this policy in the proposed Green Belt, therefore removes the opportunity to achieve this environmental improvement and improve the setting of Perth.

In summary, the removal of the Housing in the Countryside policy from the area proposed to be covered by Green Belt, also removes a number of opportunities to achieve environmental improvement of the area and to support a range of rural development and economic opportunities.

Conclusions

The vision behind the Local Development Plan is for:

“.. a Perth and Kinross which is dynamic, attractive and effective which protects its assets whilst welcoming population and economic growth.”

For the area within this Local Plan Representation, concerning the land interests of Scone Palace and the Scone Estate, this would not appear to be the case.

- The policy does not reflect the current Green Belt guidance within the SPP;
- No scenic value is attributed to any of the tracts of high quality landscape around the City;
- Neither the Green Belt nor the Designed Landscape are able to offer protection to a key asset against the significant adverse impact of the route alignment chosen for the new Tay crossing;
- The Green Belt is highly constrictive in allowing regeneration of derelict and redundant buildings of architectural significance within the smaller villages of the Estate at Old Scone and Balboughty;
- The fragility of the viability and landscape management of large Estates such as Scone and their importance within the local and national economy both for their visitor offer and landscape character is not recognised within the LDP nor supported by the Green Belt policy;
- The approach to the Green Belt designation makes greenfield release that could underpin a carefully considered Estate management plan difficult to promote.

Clearly, Scottish Government Policy promotes a growth agenda for the country, and planning policy in particular is required to set a positive policy context for the growth of business and employment opportunities. The imposition of the onerous and unwieldy Green Belt designation, especially one of the extent and with the policy restrictions envisaged in the Perth and Kinross Proposed Plan, is at odds with this wider growth agenda.

The main core document setting out the case behind the objections to the Proposed Plan puts forward an alternative to the Green Belt designation covering much of the Scone Palace, grounds and Estate. This alternative approach would involve the creation of **a specific Scone Palace and Estate Masterplan, Supplementary Planning Guidance** document which would be developed in full partnership with Perth and Kinross Council, other key stakeholders and in consultation with the community. This document would set out a clear agenda for the protection of the key attributes of the Palace and Estate, including its contribution to the setting of Perth, while planning carefully for vital new enterprises and development critical to the long term sustainability of the Palace and Estate.

The actual boundaries and extent of the Masterplan SPG area could be defined in partnership with the Council as

part of the development of this proposed document.

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 Debbie Mackay, Smiths Gore on behalf of Scone Palace and Estate

Address and Postcode; Smiths Gore, 12 Bernard Street, Edinburgh, EH6 6PY

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: **Yes**

Supplementary Guidance:

SEA Environmental Report – Addendum 2:

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. **Prime Agricultural Land**

or

Site ref.

or

Chapter

Page no. **Page 49**

Paragraph no.

4. What your representation?

Are you supporting the Plan?

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

The policy should go on to state that:

“ If detailed studies show that the land is in fact not prime agricultural land, this policy will be waived.”

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

This objection forms part of a suite of objections to the Proposed Plan, aimed at achieving a more positive and supportive policy context to enable Scone Palace and Estate to survive and grow, thereby securing its future and key contribution to Perthshire and Scotland's tourism offer and economy. A core document has been produced and submitted as supporting information in relation to these objections.

The MacAuley Land Use Classification maps are the main source of information on prime agricultural land across Scotland. However, they are unavoidably, quite broad-brush and it may be necessary on occasion to conduct a more detailed investigation into the land concerned, if it is needed for development, in order to ascertain whether the specific area under consideration, is in fact “prime”.

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 Debbie Mackay, Smiths Gore on behalf of Scone Palace and Estate

Address and Postcode; Smiths Gore, 12 Bernard Street, Edinburgh, EH6 6PY

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: **Yes**

Supplementary Guidance:

SEA Environmental Report – Addendum 2:

SEA ER Addendum 2 – Appendices:

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

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

Policy ref:

or

Site ref.

or

Chapter: **Chapter 4: Spatial Strategy: Hierarchy of Settlements**

Page no.

Paragraph no: **4.2.1 and 4.2.2**

4. What is your representation?

Are you supporting the Plan?

Or

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

The Spatial Strategy should clarify that the smaller settlements which are not listed in the three Tiered hierarchy of settlements, can now be considered as Building Groups under the Housing In the Countryside Policy.

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

This objection forms part of a suite of objections to the Proposed Plan, aimed at achieving a more positive and supportive policy context to enable Scone Palace and Estate to survive and grow, thereby securing its future and key contribution to Perthshire and Scotland's tourism offer and economy. A core document has been produced and submitted as supporting information in relation to these objections.

There are a range of small settlements within Scone Estate (Harrietfield, Chapelhill (Logiealmond) and Stormontfield) which lend themselves to small amounts of incremental growth in line with the Housing in the Countryside policy. The release of small numbers of plots for individual houses in these settlements can provide a source of capital for the Estate to invest in the enterprises required to sustain the Palace and grounds as viable visitor attractions.

The Proposed Plan does not deal with these settlements and therefore a policy vacuum exists. Clarification is required. Paragraph 4.2.2 is unclear. Does it mean that the Plan restricts growth to no houses or that the numbers will be limited? The plan should make it clear that small settlements such as those named can be considered housing clusters under the Housing in the Countryside policy.

The smaller settlements in more remote parts of Perthshire such as Harrietfield and Chapelhill in Logiealmond, require some level of growth in order to sustain local services and provide accommodation for local people. The SPP supports this type of growth.

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 Debbie Mackay, Smiths Gore on behalf of Scone Palace and Estate

Address and Postcode; Smiths Gore, 12 Bernard Street, Edinburgh, EH6 6PY

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: **Yes**

Supplementary Guidance:

SEA Environmental Report – Addendum 2:

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. **Perth S tlement Map showing the choice of route for the Cross Tay Lnik Road and:**

or

Chapter **5: Perth Area Spatial Strategy**

Page no.

Paragraph no. **5.1.15 (2) Transport Infrastructure**

4. What is your representation?

Are you supporting the Plan?

Or

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

The Perth Area Plan showing the preferred corridor for the Cross Tay Link Road (CTLR) should be altered and the most northerly route as explored in the STAG appraisal and consultation, used instead.

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

This objection forms part of a suite of objections to the Proposed Plan, aimed at achieving a more positive and supportive policy context to enable Scone Palace and Estate to survive and grow, thereby securing its future and key contribution to Perthshire and Scotland's tourism offer and economy. A core document has been produced and submitted as supporting information in relation to these objections.

Scone Palace and Estate supports the principle of a Cross Tay Link Road but has significant objections to the route proposed in the Proposed Plan. This route comes directly through the Designed Landscape and the proposed green belt. It sits directly in the setting of Scone Palace, one of Perthshire and Scotland's most historic houses. The route comes within close proximity to both the historic schedule monument of the roman camp site and areas of Ancient Woodland and semi-natural Ancient Woodland. It also severs one of the Estate's key farms, creating a large loss of agricultural land and complicating the management of that farming unit. The height of clearance required for the bridge to cross the A9, the railway and the Tay, in a single span will be significant and will create a bridge and associated road accesses which are highly visually intrusive and will also affect the Estate's fishing business.

The choice of route seems completely at odds with the imposition of the Green Belt designation which is ostensibly seeking to protect the setting of Perth. No clear justification for the choice of this route over the more northerly route (previously considered) has been provided by Perth and Kinross Council.

In addition, it is noted that Historic Scotland commented as follows on the Proposed Cross Tay Link Road options in the Scottish Government comments on the Perth and Kinross Main issues report;

"Historic Scotland...note that they are generally content with the principle of the proposed Cross Tay Link Road Route Corridor E identified in the MIR." (N.B. Corridor E is the most northerly route shown in the MIR.)

Historic Scotland goes on to state;

"..while the corridor still has the potential to affect historic environment assets within their remit, Route E is the best option presented in the strategy for their interests and they are content that these issues can be addressed as the project develops . In particular it will be important to avoid direct impacts on the scheduled monument Grassy Walls, Roman Camp (Index No 4072) and to consider how the impacts of Scone Palace designed landscape can be minimised."

It is completely unclear why Perth and Kinross Council have gone against this direct advice from Historic Scotland. There is no justification given in the Proposed Plan or in any other published document which we have found, for the choice of route C over route E.

Scone Palace recognises the benefits which a Cross Tay Link would have for the area but has great concerns over the particular route being promoted. The Palace and wider Estate is the victim of two particularly damaging policies (green belt designation and the choice of route C of the CTRL) which in combination have the potential to drive this historic national treasure into a spiral of decline. The CTRL will damage the setting of the historic building, and designed landscape making it less attractive to visitors, while the green belt restrictions will make it impossible for the Estate to develop other enterprises, new facilities and visitor attractions, necessary to make the Palace and hinterland, economically sustainable. This position has been advocated for some time; the Historic Scotland objection to the Perth Local Plan from 1993 regarding the proposed route remains valid and is included for reference within Appendix 3 of the supporting information Core Document.

In addition, the Estate does not support continuation of the proposed CTRL beyond the A9 and into Bertha Park on grounds of landscape impact.

The accompanying document to this and the other suite of objections contains information on the economics of the facility which makes sobering reading.

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 Debbie Mackay, Smiths Gore on behalf of Scone Palace and Estate

Address and Postcode; Smiths Gore, 12 Bernard Street, Edinburgh, EH6 6PY

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: **Yes**

Supplementary Guidance:

SEA Environmental Report – Addendum 2:

SEA ER Addendum 2 – Appendices:

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

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

Policy ref.

or

Site ref.:

or

Chapter **5.6 Almondbank, Pitcairngreen and Cromwellpark**

Page no. **pages 87 and 88**

Paragraph no. **5.5**

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.

Scone Palace and Estate would wish to see an allocation of land for housing development to the east of Bridgeton farm in Pitcairngreen as shown on the attached map and previously submitted to the Call for Sites and Main Issues Report. They would wish to see the green belt designation pulled back from around Pitcairngreen and removed to the higher ground to the east of the village near the Bertha Park allocation. See attached plan.

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

This objection forms part of a suite of objections to the Proposed Plan, aimed at achieving a more positive and supportive policy context to enable Scone Palace and Estate to survive and grow, thereby securing its future and key contribution to Perthshire and Scotland's tourism offer and economy. A core document has been produced and submitted as supporting information in relation to these objections.

Scone Palace owns land surrounding Pitcairngreen and has promoted for development a small site to the east of the village to the rear of the Bridgeton Farm steadings complex.

Pitcairngreen is a village to the west of Perth which is notable for the central green which contains attractive mature trees, is overlooked by residential development and has an attractive pub on the corner. The Estate owns all the land around the village. A core path runs along the southern edge, and further into the village. The village is well contained from the adjacent settlement of Almondbank to the south and there are no views to the Perth conurbation to the east of Pitcairngreen. This is due to the interplay of topography and mature trees. Pitcairngreen sits at a relatively low elevation beside the Gelly Burn and is surrounded by a series of knolls. Some of these, particularly to the south and east of the village have mature trees on top which further aid with visual separation and screening.

The village has a rural character which is attractive but with edges which are discordant with the environment.

The Estate wishes to promote land to the south of the village which could redress this, in part. The land area concerns an area of just over a hectare to the south-east that encompasses Bridgeton Farm which is on the southern edge. The land is farmed by the Estate but these farm buildings are no longer required hence whilst Bridgeton farmhouse is occupied the farm buildings are empty. Whilst not listed these buildings are a potentially attractive grouping which could be converted to residential use. The proposal would be to carry this out in conjunction with residential development to the east. Well-designed new buildings could offer a good landscape fit within the context of the local topography and screening. This would extend the developed edge out to forming a defensible eastern boundary which could be further enhanced through creating a planted edge which will contain the eastern village. As single owner, the Estate has the ability to effectively deliver this site.

This land to the rear of the steadings is an unobtrusive, low lying site which would lend itself to some back land development similar to that which has happened in the western part of the village. This site would be developed in conjunction with the Bridgeton farm steading complex and as

such would result in a considerable environmental improvement to the southern entrance to this conservation village.

The arguments for a green belt designation being taken as far as Pitcairngreen, which could in no sense be considered to be part of the “setting of Perth”, are not rational. The village is under no threat of coalescence and development to the west would provide a balance to the overall settlement pattern of the village, centred on the village green.

The site is not marked on the SEPA flood risk maps. There is a small watercourse running through the site which has been assessed by a flood risk expert who concluded that “I do not foresee flood risk from the watercourse as preventing the land being developed for residential use”.

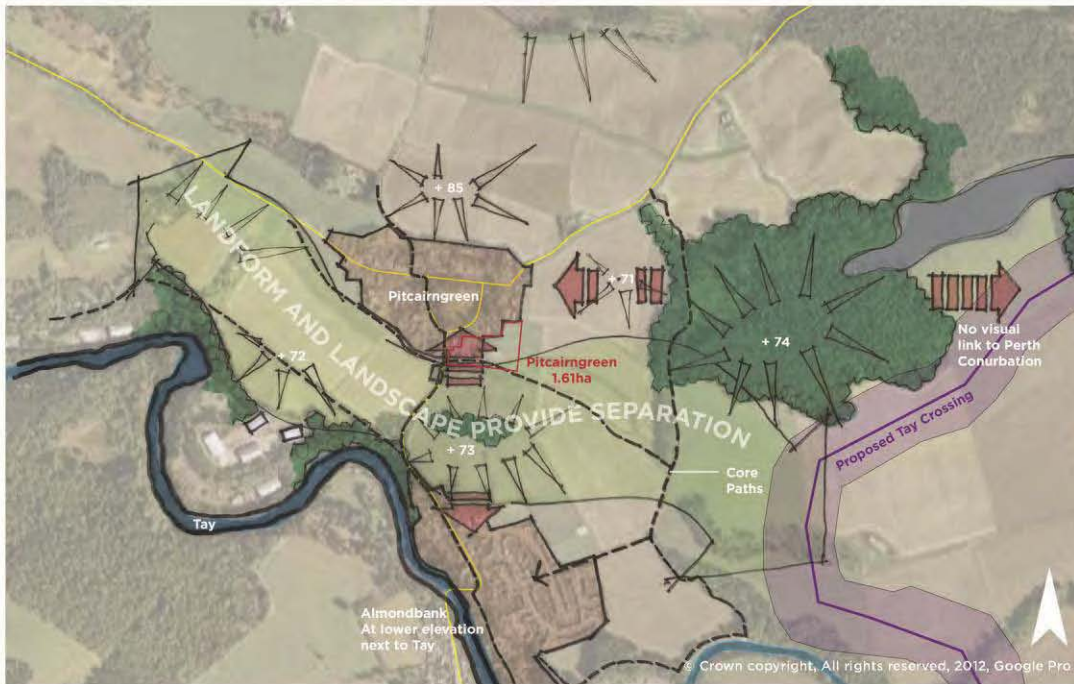
This site proposed at Pitcairngreen offers a measured and proportionate level of growth to the village. Its location to the rear of existing buildings and with access through an existing street frontage means that it will not create urban sprawl, ribbon development or coalescence. The low lying nature of the site means that it will be easily integrated into the landscape with the wooded raised tree belt to the east providing a backdrop to the housing.

The village has a number of facilities which a new housing development would support. Without some prospect of growth in the future, there is a real danger to the sustainability of these facilities.

The benefits to the village and the Estate of the area of land being allocated are:

- Additional housing within less than 5 minutes walking can help support an important local business, the pub;
- Housing choice would be offered to meet local needs ranging from conversion to new build properties;
- Preparation of a small design code as part of the on-going Estate Masterplan process will secure design consistency and sensitivity to the edge of the settlement;
- An improved approach to the village from the south
- Creation of a robust eastern boundary
- On-going sensitive maintenance of the land and woodland to the south as part of the on-going Estate operations will continue to provide a secure separation between the village and Almondbank.

The plan below illustrates the proposals for Pitcairngreen.



Pitcairngreen Capacity Analysis

Scale: 1:20,000



Pitcairngreen Proposal

Scale: 1:5,000

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 Debbie Mackay, Smiths Gore on behalf of Scone Palace and Estate

Address and Postcode; Smiths Gore, 12 Bernard Street, Edinburgh, EH6 6PY

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: **Yes**

Supplementary Guidance:

SEA Environmental Report – Addendum 2:

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. **H29 Scone North**

or

Chapter

Page no. **Page 142**

Paragraph no.

4. What is your representation?

Are you supporting the Plan?

Or

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

Scone Estate would wish to see the following text in the policy removed "Houses cannot be occupied until CTRLR constructed".

Scone Estate supports the inclusion of the H29 Scone North site in the Development Plan.

Scone Estate objects to the embargo on development at North Scone until the CTRLR is a committed project.

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

This objection forms part of a suite of objections to the Proposed Plan, aimed at achieving a more positive and supportive policy context to enable Scone Palace and Estate to survive and grow, thereby securing its future and key contribution to Perthshire and Scotland's tourism offer and economy. A core document has been produced and submitted as supporting information in relation to these objections.

Scone North is being promoted primarily by A and J Stephen House builders and this objection is in support of their main separate objection.

It is understood, and correspondence between A and J Stephen and the Council in January 2012 clarifies that the phrase "Houses cannot be occupied until CTRLR constructed" is a mistake. Jim Irons, Depute Chief Executive and Executive Director (Environment), Perth and Kinross Council stated in an email to A and J Stephen on 17 January which stated the following;

"It is an error. The committee report and the strategy introduction make it clear the commitment stage is the critical trigger. I think what was intended was a statement that the first phase i.e. the link off the A94 will need to be constructed to provide access to the site."

and;

"The details can be clarified in the Masterplan and the Supplementary Guidance. Hope this provides some reassurance".

While the change in the text is welcomed, it is a concern that the Council feel that they should embargo the entire site given the fact that their own housing numbers require sites to come forward urgently to meet the forecast demand for housing in Perthshire. The related objection by A and J Stephen will address the issues relating to the embargo in more detail. It is the Estate's view that a total embargo is unnecessary. A small amount of housing could be brought forward at Scone North in advance of the bridge being either committed or built without having a significant impact on the congestion and traffic issues in Perth.

Scone Estate notes that the Council and the Truck Roads Authority, in the recently approved application in Almond Valley (ref 08/00678/OUT) for 1800 houses, accepted the argument that despite the increase in road traffic flows due to the increase in newer cleaner vehicles over time, the air quality/congestion issues will be significantly reduced.

Scone is the largest village in the Perth Housing Market Area and as such is particularly well placed to meet significant housing allocations for the Perth HMA as it is within easy commuting

distance of Perth, has good public transport links and has a significant number of services and facilities all within walking distance of the edge of the settlement.

The North Scone site is particularly well located for access to the village and provides a well integrated opportunity for new development. The site has a superb setting on the northern perimeter of Scone. The mature woodland provides existing visual enclosure and an attractive backdrop to the site. The development of this site with appropriate landscape measures will enhance the northern gateway into Scone.

The site is adjacent to the Park and Ride facility and therefore offers a sustainable location which will assist in reducing congestion on commuter routes into Perth. Given the choice of transport options, particularly public transport including the most frequent bus service in Perthshire. The number 7 bus goes every 10 minutes from Scone. Further, there are many facilities within walking distance of the site and planning permission has been granted for a new supermarket opposite the east end of the site and beside the Park and Ride. This will vastly reduce the need for the residents of North Scone to travel for services and grocery shopping. Therefore the impact on congestion and air quality in Perth will be minimal from a small initial release of houses at North Scone. This is one of the most sustainable locations for housing development in Perthshire.

The site at North Scone is an easily serviced site with few significant infrastructure issues and which can be easily brought forward compared to most of the large housing sites in Perthshire. It therefore has the ability to assist in meeting the Council's housing targets at an earlier stage than many other sites.

It is worth noting that this is the only significant housing proposal that does not affect a trunk road.

The allocation of a strategic site in this location will facilitate the delivery of a significant proportion of affordable housing to meet the considerable need in this area. Recent water supply and drainage improvements mean that the site can be readily serviced.

A and J Stephen will refer in detail in their complementary submission to the fact that the drainage which is being designed, and will be put in place, for the Scone North site can assist in the wider drainage issues at Scone and could facilitate a much improved situation for the village.

The site is the subject of an agreement between A and J Stephen Ltd and Scone Estates. It can therefore be readily delivered. A and J Stephen are of the view that Scone is the most marketable location in Perthshire. They have continued to build and sell houses in Scone throughout the recession.

There is therefore a strong case for the embargo to be relaxed to allow this important site to be opened up with an initial phase of housing coming forward before the bridge is either committed or built.

Please refer to the separate, complementary submission by A and J Stephen for further detail.

Please also refer to a separate objection regarding a small site to the west of North Scone which forms part of the entrance to the site from the west which could usefully form a part of the North Scone allocation and should be left out of the proposed Green Belt.

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 Debbie Mackay, Smiths Gore on behalf of Scone Palace and Estate

Address and Postcode; Smiths Gore, 12 Bernard Street, Edinburgh, EH6 6PY

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: **Yes**

Supplementary Guidance:

SEA Environmental Report – Addendum 2:

SEA ER Addendum 2 – Appendices:

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

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

Policy ref.

or

Site ref.

or

Chapter **Green Belt**

Page no. **5.1**

Paragraph no. **5.1.3**

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.

Scone Estate would wish to see the area of land to the west of H29 North Scone shown on the attached plan, removed from the proposed green belt.

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

This objection forms part of a suite of objections to the Proposed Plan, aimed at achieving a more positive and supportive policy context to enable Scone Palace and Estate to survive and grow, thereby securing its future and key contribution to Perthshire and Scotland's tourism offer and economy. A core document has been produced and submitted as supporting information in relation to these objections.

The area of land to the west of the allocated sites at North Scone is 2.32 hectares and is enclosed on three sides. Two sides are enclosed by mature woodland, while the other boundaries with housing in Scone village. The allocation for North Scone runs partially through this site through Old Scone Wood to access the road between the A93 and Scone. The site will therefore be partially developed as part of the North Scone allocation. It would therefore be logical to include this site within the settlement boundary of Scone to allow for a small expansion in this direction. A strong tree belt can be put in place on the northern boundary of the site to provide a suitable settlement boundary. The exclusion of this site from the green belt will have no impact on any of the key objectives of this proposed designation. It is completely invisible from Perth and will not affect its setting, views and special character. Obviously it will not create coalescence with Bridgend.

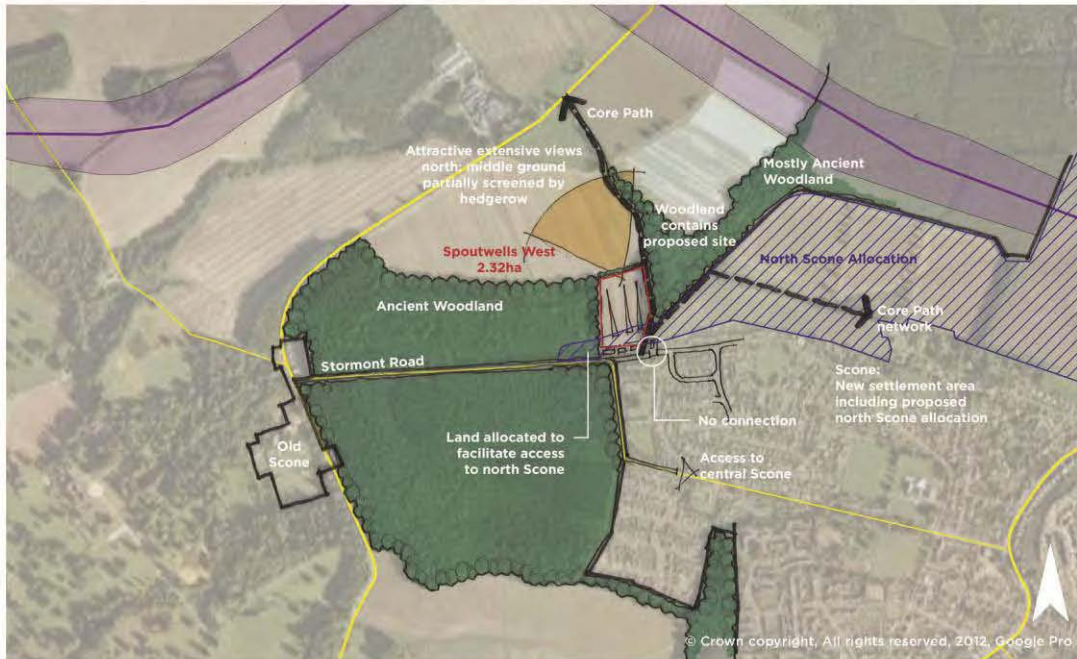
The site enclosure means that the site is almost completely hidden from Harper Way, the street that leads off Stormont Road.

This site offers a good opportunity for residential development that is a continuation of North Scone. It is well-contained, maximises the benefits of the new access road and offers an attraction for development within the woodland setting and with good path links.

The release of this site for housing will assist Scone Estate in funding the continued management and investment in Scone Palace, grounds and enterprises as outlined in the core document which sets the context for this objection (See link to this document).

There is no reason for the exclusion of this small site from the settlement boundary of Scone.

A plan of this site is shown below.



Spoutwells West Capacity Analysis

Scale: 1:20,000



Spoutwells West Proposal

Scale: 1:5,000

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 Debbie Mackay, Smiths Gore on behalf of Scone Palace and Estate

Address and Postcode; Smiths Gore, 12 Bernard Street, Edinburgh, EH6 6PY

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: **Yes**

Supplementary Guidance:

SEA Environmental Report – Addendum 2:

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. **Guildtown**

or

Chapter **5.22**

Page no. **120**

Paragraph no.

4. What is your representation?

Are you supporting the Plan?

Or

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

Scone Estate would wish to see the settlement boundary for Guildtown drawn more generously to the west to allow for a more substantial amount of growth in the plan period.

The Estate supports the settlement boundary allowing for a certain amount of growth already but would wish to see a larger, deeper area made available as per the attached plan.

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

This objection forms part of a suite of objections to the Proposed Plan, aimed at achieving a more positive and supportive policy context to enable Scone Palace and Estate to survive and grow, thereby securing its future and key contribution to Perthshire and Scotland's tourism offer and economy. A core document has been produced and submitted as supporting information in relation to these objections.

Scone Estate welcomes the extension of the settlement boundary at Guildtown to include land to the west of the main road through the village. While this is welcomed, the Estate would wish to see a wider area allocated as per their previous submissions.

There is scope for further development on the west side of the village to provide for its sustainable growth. There are no environmental designations affecting the sites and there is no flood risk in the area. Scottish Water have confirmed that they will progress the necessary improvements to services in the village to provide for the existing allocations and any further extensions to the sewage treatment works could be facilitated by the provision of additional land by Scone Estate.

In the light of the proposed Cross Tay Link Road, there is a longer term opportunity for Guildtown to form the basis of a new settlement for Perth given its location near the route of this new road. Given the strategic need to protect the setting of Perth, the expansion of surrounding villages is inevitable over time. Scone will be able to provide for the substantial immediate needs of the Perth Housing Market Area and Guildtown could become the basis of a longer term expansion when the bypass is constructed. Consideration should therefore be given to the longer term expansion of this area.

Therefore a more substantial allocation in the LDP would assist in creating the economies of scale required to justify a more strategic masterplanning exercise for the village and ensure a holistic approach is taken, avoiding piecemeal development.

This village has a good range of facilities but some of these are clearly under threat. The hotel has closed and is looking for a new purchaser. The allocation of more land here would assist in encouraging investment in the hotel and support the retention of the other facilities in the village.

A plan of Guildtown illustrating these points is shown below.



Guldton Plan

Scale: 1:20,000

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 Debbie Mackay, Smiths Gore on behalf of Scone Palace and Estate

Address and Postcode; Smiths Gore, 12 Bernard Street, Edinburgh, EH6 6PY

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: **Yes**

Supplementary Guidance:

SEA Environmental Report – Addendum 2:

SEA ER Addendum 2 – Appendices:

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

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

Policy ref.

or

Site ref.

or

Chapter **Green Belt – Pickstonhill, Scone**

Page no. **5.1**

Paragraph no. **5.1.3**

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.

Scone Estate would wish to see the area of land at Pickstonhill, shown on the attached plan, removed from the proposed green belt.

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

This objection forms part of a suite of objections to the Proposed Plan, aimed at achieving a more positive and supportive policy context to enable Scone Palace and Estate to survive and grow, thereby securing its future and key contribution to Perthshire and Scotland's tourism offer and economy. A core document has been produced and submitted as supporting information in relation to these objections.

The area of land at Pickstonhill has the potential to provide a new and more defined settlement or green belt boundary for the southern edge of Scone village. A new settlement edge is proposed in the attached plan and further information is provided in the main objection document associated with all the Scone Estate objections.

This particular site has the ability to provide a strong settlement boundary with a considerable element of open space, including allotments and countryside paths which will link through to the Scone Palace Designed Landscape and to the wider countryside to the east of Scone. There is a strong demand from the local residents for allotments and this area has the potential to provide them, creating a highly defensible space and a very appropriate use of the countryside in this location. The Estate is also promoting an area of housing in this location as part of the proposals for this site. It is the Estate view that this release of land for housing in this location will create the opportunity to make a new and much more defensible and appropriate settlement boundary.

The current southern edge of the settlement forms a discordant edge and poor approach into Scone from the south, with high density housing clustered along the edge.

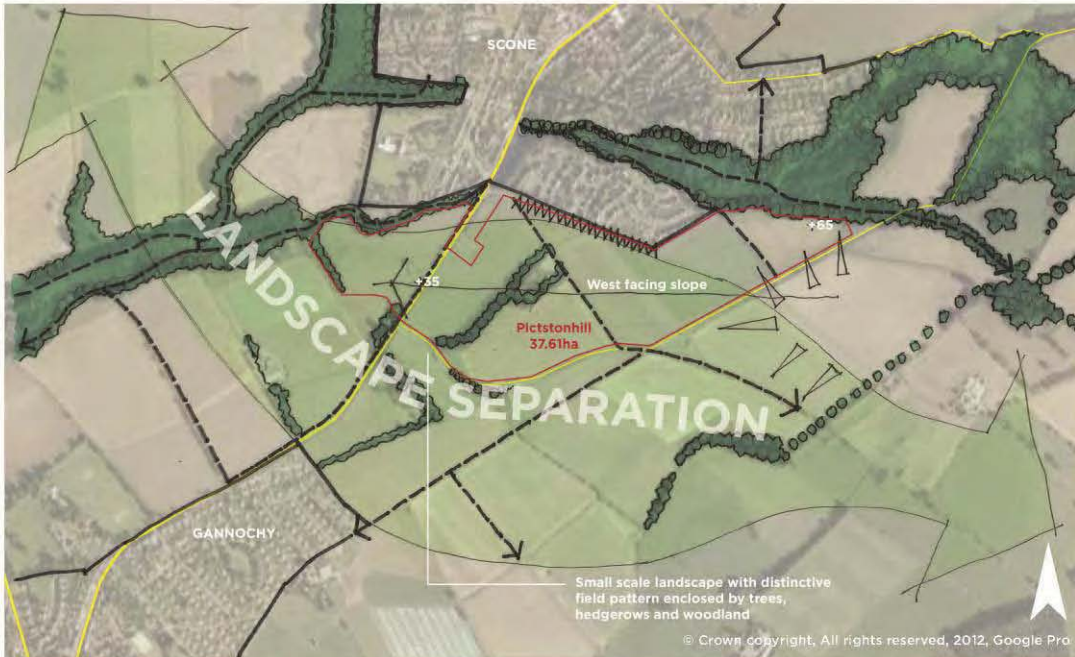
The next settlement is Gannochy which is separated from Scone by several fields and mature planting as well as the farmland and farm houses of Pickstonhill and Ardmoy. The Council has raised concerns about future coalescence. The site is within the proposed Green Belt and several core paths run through and around the site. This is a small scale landscape with a small field structure and mature planting that has some capacity for development. Whilst the proximity between the two settlements is recognised there is still an opportunity for new development along the edge of Scone that can fulfil the following functions:

- Create a robust settlement edge through planting and use of the minor road leading east from south of Pickstonhill
- Connect the core path network up with a safe route for walking and cycling
- Provide land for local allotments meeting a local shortage and demand.
- Connect well into Scone through use of existing streets to create a legible place that feels part of Scone and not a "bolt-on".
- Helps meet housing needs (see below)

The ability to release sites such as this for housing and other complementary community uses will assist Perth and Kinross in meeting its housing numbers. There is a need and demand for smaller housing sites of this kind with no infrastructure restrictions. This is all the more necessary if Perth continues to embargo so many of its larger sites until certain infrastructure requirements are met.

There has been considerable developer interest in this site demonstrating its ability to come forward to the market.

See plan below showing the site referred to above.



Pictstonhill, Scone Capacity Analysis

Scale: 1:20,000



Pictstonhill, Scone Proposal

Scale: 1:20,000

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 Debbie Mackay, Smiths Gore on behalf of Scone Palace and Estate

Address and Postcode; Smiths Gore, 12 Bernard Street, Edinburgh, EH6 6PY

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:

Supplementary Guidance: **Yes _ Housing in the Countryside SPG**

SEA Environmental Report – Addendum 2:

SEA ER Addendum 2 – Appendices:

If making a representation on Supplementary Guidance, please state the name of the document:
Housing in the Countryside SPG

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

Policy ref.

or

Site ref.

or

Chapter

Page no.

Paragraph no.

4. What is your representation?

Are you supporting the Plan?

Or

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

The Housing in the Countryside Supplementary Planning Guidance should :

Apply in the area of the Proposed green belt which comprises Scone Palace and Estate.

Make clear that smaller settlements outwith the three tiers of the settlement hierarchy are eligible under the Housing in the Countryside Policy.

This Housing in the Countryside Policy could apply in adherence to a Scone Palace and Estate Masterplan, Supplementary Planning Guidance, as proposed in a complementary objection submitted by Mansfield Estate.

Scone Estate promotes 4 options for the treatment of the green belt proposal with preferences for either Option 1 or Option 4;

Option 1: Complete Removal Of Proposed Green Belt Designation

The policy and plan are completely removed from the Local Development Plan

Option 2: Alterations to the Green Belt Boundaries

If (1) is not accepted, that the boundaries of the green belt be altered as follows;

- 2.1 Completely withdrawn from the Scone Palace Designed Landscape
- 2.2 Withdrawn from the site to the west of North Scone as shown in the main Core Document accompanying this representation
- 2.3 Withdrawn from the site known as Pickstonhill to the south of scone as proposed in figure....
- 2.4 Withdrawn from the area to the east of Pitcairngreen

Option 3: Alterations to the Green Belt Policy Wording

If (1) and (2) are not accepted, the policy wording is altered to state that development will only be permitted where:

- 3.1 It provides a new business opportunity or supports an existing one, or,
- 3.2 It utilises and regenerates a rural brownfield site
- 3.3 It fits within the landscape in a way which does not detrimentally affect the setting of Perth.
- 3.4 It fits within the following selected Housing in the Countryside Policy criteria:
 - Building Groups;
 - Infill Sites;
 - New Houses: in existing walled gardens; relocated from an area of flood risk; or needed in relation to an economic activity;
 - Renovation or replacement of houses;
 - Conversion or replacement of redundant non-domestic buildings;
 - Rural Brownfield Land;

Option 4: Scone Palace and Estate Masterplan Supplementary Planning Guidance

A further and preferred option is for the LDP to create a special designation for Scone Palace and Estate which explicitly supports the Masterplan as a management tool for the long term protection, enhancement and financial and environmental sustainability of the national resource. This approach

would involve the creation of a specific Scone Palace and Estate Masterplan, Supplementary Planning Guidance document which would be developed in full participation with Perth and Kinross Council, other key stakeholders and in consultation with the community. This document would set out a clear agenda for the protection of the key attributes of the Palace and Estate, including its contribution to the setting of Perth, while planning carefully for vital new enterprises and development critical to the long term sustainability of the Palace and Estate.

The actual boundaries of this Masterplan could be worked out in partnership with the Council as part of the process of developing the SPG.

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

This objection forms part of a suite of objections to the Proposed Plan, aimed at achieving a more positive and supportive policy context to enable Scone Palace and Estate to survive and grow, thereby securing its future and key contribution to Perthshire and Scotland's tourism offer and economy. A core document has been produced and submitted as supporting information in relation to these objections. The reasons for the objection to the green belt proposal are set out below in an extract from this document.

1) Green Belt Restrictions

The reasons for the stipulation in the SPG that the Housing in the Countryside policy does not apply in the green belt area is a particular concern. The policies in the Housing in the Countryside Policy and Supplementary Planning Guidance (Dec 2011) provide a limited number of useful opportunities to (as the policy states) "*encourage sustainable development in rural areas*" and "*safeguard the character of the countryside; support the viability of communities; meet development needs in appropriate locations; and ensure that high standards of siting and design are achieved*" Surely all of these objectives are just as applicable to the green belt as they are to the wider Perth countryside?

The Housing in the Countryside policy supports proposals for the "Erection or creation through conversion, of single houses and groups of houses in the countryside which fall into at least one of the following categories":

- Building Groups
- Infill sites
- New houses in the open countryside on defined categories of sites including: existing gardens on a country estate and in walled gardens; relocation from flood risk zones; houses for key workers associated with an economic activity; new countryside estate houses of outstanding architectural quality and new designed landscape; houses for local people; Pilot projects for eco-homes;
- Renovation or replacement of houses
- Conversion or replacement of redundant non-domestic buildings
- Development on rural brownfield land.

The withdrawal of this policy from the proposed green belt area will remove some key opportunities to enhance the area covered. The Housing in the Countryside Policy creates limited but useful scope for new build in rural areas in very restricted situations. The impact on the proposed green belt of this policy would be minimal and its embargo makes an already restrictive policy even more inflexible.

Categories (1) and (2) provide some scope for **infill within existing small building groups**. The restrictions applied in the policy are such that this type of development can be strictly controlled. There is therefore no necessity to exclude these aspects of the policy from the green belt.

Category (3) **New Houses in the Open Countryside** provides limited opportunities which again should not create any particular issues for the green belt. By their very nature the "Existing

Gardens” criteria 3.1 (a), suggests an existing suitable setting for a house and restricts it to situations where “development would not fundamentally affect the qualities and integrity of the site.” This restriction combined with the “All Proposals” criteria and the “Siting” criteria in the policy should easily be sufficient to provide the necessary quality of proposals to protect the setting of Perth.

The “**Walled Garden**” category (3.1 (b) by its very nature will have no impact on the wider landscape as development will be contained within high walls. Indeed it is completely contrary to afford this opportunity to assist in the preservation of the walls of such gardens outwith the green belt while not allowing this opportunity within the green belt.

Category 3.2 deals with the relocation of houses away from **Flood Risk** areas. Given that so much of the Green Belt adjoins the Tay river valley, and may be affected by flood risk, it would seem contrary not to allow this aspect of the policy to apply.

Category 3.3 deals with **houses required in relation to economic activities**. It again appears contrary to the need for sustainable rural development to refuse to allow scope for such proposals in the area around Perth covered by the proposed green belt. Many new rural businesses are more likely to thrive if they are in location close to centres of population. The green belt designation (based on the restrictions on economic activities and on accompany housing in the green belt policy) pushes such business opportunities outwith Perth’s immediate hinterland therefore reduces the opportunity for shorter travel distances and ease of access to a key market place.

Category 3.5 **Pilot projects creating eco-friendly houses** is an attractive and forward-thinking policy which it would be unfortunate to loose from the area covered by the proposed green belt. However, it is less critical a loss than other categories.

Category 4 **Renovation or replacement of houses including vacant or abandoned houses** is an important positive policy which can assist in making the countryside more attractive and creates a careful use of existing resources by bringing abandoned houses into use. Again it seems illogical not to allow this policy in the rural hinterland of Perth.

While aspects of category 5 **Conversion** are allowed under the proposed green belt policy, the “replacement of redundant non-domestic buildings does not appear to be acceptable. This does not make sense in respect of the stated objectives of the green belt designation – “to preserve the setting, views and special character of Perth”. Such buildings may be in a ruinous condition and past the ability to be repaired but may offer a suitable location for redevelopment. The existence of ruinous buildings in the hinterland of Perth will not enhance the city’s setting. The green belt designation in its current form will therefore work actively against the environmental improvement of the setting of Perth,

Category 6, **Rural Brownfield Land** is geared towards removing dereliction and gaining a significant environmental improvement on sites formerly occupied by buildings by allowing a small-scale development of up to 5 houses. The removal of this policy in the proposed green belt, therefore removes the opportunity to achieve this environmental improvement and improve the setting of Perth.

In summary, the removal of the Housing in the Countryside policy from the area proposed to be covered by green belt, also removes a number of opportunities to achieve environmental improvement of the area and to support a range of rural development and economic opportunities.

2) Smaller Settlements and the Housing in the Countryside Policy

There are a range of small settlements within Scone Estate (Harrietfield, Chapelhill (Logiealmond) and Stormontfield) which lend themselves to small amounts of incremental growth in line with the Housing in the Countryside policy. The release of small numbers of plots for individual houses in

these settlements can provide a source of capital for the Estate to invest in the enterprises required to sustain the Palace and grounds as viable visitor attractions.

Neither the SPG or the Proposed Plan does not deal with these settlements and therefore a policy vacuum exists. Clarification is required. Paragraph 4.2.2 is unclear. Does it mean that the Plan restricts growth to no houses or that the numbers will be limited? The plan should make it clear that small settlements such as those named can be considered housing clusters under the Housing in the Countryside policy.

The smaller settlements in more remote parts of Perthshire such as Harrietfield and Chapelhill in Logiealmond, require some level of growth in order to sustain local services and provide accommodation for local people. The SPP supports this type of growth.

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 Debbie Mackay, Smiths Gore on behalf of Scone Palace and Estate

Address and Postcode; Smiths Gore, 12 Bernard Street, Edinburgh, EH6 6PY

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: **Yes**

Supplementary Guidance:

SEA Environmental Report – Addendum 2:

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: **RD3: Housing in the Countryside**

or

Site ref:

or

Chapter:

Page no: **page 32**

Paragraph no:

4. What is your representation?

Are you supporting the Plan?

Or

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

The Statement in Policy RD3 "This policy does not apply in the Green Belt" should be either removed or should be changed to state the following:

"This policy does not apply in the Green Belt except where it fits with the Scone Palace and Estate Masterplan, Supplementary Planning Guidance".

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

This objection forms part of a suite of objections to the Proposed Plan, aimed at achieving a more positive and supportive policy context to enable Scone Palace and Estate to survive and grow, thereby securing its future and key contribution to Perthshire and Scotland's tourism offer and economy. A core document has been produced and submitted as supporting information in relation to these objections.

Policy RD3: Housing in the Countryside, and its accompanying SPG provides a useful and positive interpretation of Scottish Planning Policy in relation to rural development and rural housing. However, excluding this very useful policy from the green belt is completely unnecessary and counter-productive. The policies provide a limited number of useful opportunities to (as the policy states) "encourage sustainable development in rural areas" and "safeguard the character of the countryside; support the viability of communities; meet development needs in appropriate locations; and ensure that high standards of siting and design are achieved" Surely all of these objectives are just as applicable to the green belt as they are to the wider Perth countryside?

The withdrawal of this policy from the proposed green belt area will remove key opportunities to enhance the area covered. The policy creates limited but useful scope for new build in rural areas in very restricted situations. The impact on the proposed green belt of this policy would be minimal and its embargo makes an already restrictive policy even more inflexible.

Categories (1) and (2) provide some scope for **infill within existing small building groups**. The restrictions applied in the policy are such that this type of development can be strictly controlled. There is therefore no necessity to exclude these aspects of the policy from the green belt.

Category (3) **New Houses in the Open Countryside** provides limited opportunities which again should not create any particular issues for the green belt. By their very nature the **Existing Gardens** criteria 3.1 (a), suggests an existing suitable setting for a house and restricts it to situations where "development would not fundamentally affect the qualities and integrity of the site." This restriction combined with the "All Proposals" criteria and the "Siting" criteria in the policy should easily be sufficient to provide the necessary quality of proposals to protect the setting of Perth.

The "**Walled Garden**" category (3.1 (b) by its very nature will have no impact on the wider landscape as development will be contained within high walls. Indeed it is completely contrary to afford this opportunity to assist in the preservation of the walls of such gardens outwith the green belt while not allowing this opportunity within the green belt.

Category 3.2 deals with the relocation of houses away from **Flood Risk** areas. Given that so much of the Green Belt adjoins the Tay river valley, and may be affected by flood risk, it would seem contrary not to allow this aspect of the policy to apply.

Category 3.3 deals with **houses required in relation to economic activities**. It again appears

contrary to the need for sustainable rural development to refuse to allow scope for such proposals in the area around Perth covered by the proposed green belt. Many new rural businesses are more likely to thrive if they are in location close to centres of population. The green belt designation (based on the restrictions on economic activities and on accompany housing in the green belt policy) pushes such business opportunities outwith Perth's immediate hinterland therefore reduces the opportunity for shorter travel distances and ease of access to a key market place.

Category 3.5 **Pilot projects creating eco-friendly houses** is an attractive and forward-thinking policy which it would be unfortunate to loose from the area covered by the proposed green belt. However, it is less critical a loss than other categories.

Category 4 **Renovation or replacement of houses including vacant or abandoned houses** is an important positive policy which can assist in making the countryside more attractive and creates a careful use of existing resources by bringing abandoned houses into use. Again it seems illogical not to allow this policy in the rural hinterland of Perth.

While aspects of category 5 **Conversion** are allowed under the proposed green belt policy, the "replacement of redundant non-domestic buildings does not appear to be acceptable. This does not make sense in respect of the stated objectives of the green belt designation – "to preserve the setting, views and special character of Perth". Such buildings may be in a ruinous condition and past the ability to be repaired but may offer a suitable location for redevelopment. The existence of ruinous buildings in the hinterland of Perth will not enhance the city's setting. The green belt designation in its current form will therefore work actively against the environmental improvement of the setting of Perth

Category 6, **Rural Brownfield Land** is geared towards removing dereliction and gaining a significant environmental improvement on sites formerly occupied by buildings by allowing a small-scale development of up to 5 houses. The removal of this policy in the proposed green belt, therefore removes the opportunity to achieve this environmental improvement and improve the setting of Perth.

In **summary**, the removal of the Housing in the Countryside policy from the area proposed to be covered by green belt, also removes a number of opportunities to achieve environmental improvement of the area and to support a range of rural development and economic opportunities.

The main core document setting out the case behind the objections to the Proposed Plan puts forward an alternative to the green belt designation covering much of the Scone Palace, grounds and Estate. This alternative approach would involve the creation of **a specific Scone Palace and Estate Masterplan, Supplementary Planning Guidance** document which would be developed in full partnership with Perth and Kinross Council, other key stakeholders and in consultation with the community. This document would set out a clear agenda for the protection of the key attributes of the Palace and Estate, including its contribution to the setting of Perth, while planning carefully for vital new enterprises and development critical to the long tern sustainability of the Palace and Estate.

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 Debbie Mackay, Smiths Gore on behalf of Scone Palace and Estate

Address and Postcode; Smiths Gore, 12 Bernard Street, Edinburgh, EH6 6PY

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: **Yes**

Supplementary Guidance:

SEA Environmental Report – Addendum 2:

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. **Policy RD4 Affordable Housing**

or

Site ref.

or

Chapter

Page no. **Page 32**

Paragraph no.

4. What is your representation?

Are you supporting the Plan?

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

Remove the reference to "including conversions".

See comments on Affordable Housing Supplementary Planning Guidance.

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

This objection forms part of a suite of objections to the Proposed Plan, aimed at achieving a more positive and supportive policy context to enable Scone Palace and Estate to survive and grow, thereby securing its future and key contribution to Perthshire and Scotland's tourism offer and economy. A core document has been produced and submitted as supporting information in relation to these objections.

The request to remove the phrase "including conversions" is based on the fact that conversions of traditional buildings are particularly difficult and expensive to undertake. Conversion to housing is a good way to ensure a future for many traditional and historic buildings that are otherwise redundant for their original use and not suited to modern needs. Therefore it is not wise to add further to the cost of conversion of these valued properties by requiring affordable housing provision as part of any development.

Scone Palace has a number of historic traditional farm steadings on the Estate which would lend themselves to conversion to housing but will be expensive projects to undertake. Additional costs such as contributions to affordable housing will make these projects potentially unviable resulting in these buildings remaining unused and gradually deteriorating to the point where they could be lost.

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 Debbie Mackay, Smiths Gore on behalf of Scone Palace and Estate

Address and Postcode; Smiths Gore, 12 Bernard Street, Edinburgh, EH6 6PY

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: **Yes**

Supplementary Guidance:

SEA Environmental Report – Addendum 2:

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. **RD6 Particular Needs Housing Accommodation**

or

Site ref.

or

Chapter

Page no. **Page 33**

Paragraph no.

4. What is your representation?

Are you supporting the Plan?

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

An additional criteria should be added to the Policy as follows:

The Council will support proposals for particular needs housing and accommodation which fall into one or more of the following categories:

(c) Retirement villages

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

This objection forms part of a suite of objections to the Proposed Plan, aimed at achieving a more positive and supportive policy context to enable Scone Palace and Estate to survive and grow, thereby securing its future and key contribution to Perthshire and Scotland's tourism offer and economy. A core document has been produced and submitted as supporting information in relation to these objections.

The needs of an aging population must be met in a range of innovative ways. There is scope for Perthshire to provide support for retirement villages which could bring wealthy retired people into the area who would also contribute to the local economy by using local facilities.

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 Debbie Mackay, Smiths Gore on behalf of Scone Palace and Estate

Address and Postcode; Smiths Gore, 12 Bernard Street, Edinburgh, EH6 6PY

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: **Yes**

Supplementary Guidance:

SEA Environmental Report – Addendum 2:

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: **CF1B Open Space within New Developments**

or

Site ref.

or

Chapter

Page no. **Page 36**

Paragraph no.

4. What is your representation?

Are you supporting the Plan?

Or

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

The phrase in this policy:

“In areas where there is an adequate quantity of accessible open space in a locality, a financial contribution towards improvement or management of existing open space may be considered an acceptable alternative”

Should have the phrase below added to it:

“If it is required”.

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

This objection forms part of a suite of objections to the Proposed Plan, aimed at achieving a more positive and supportive policy context to enable Scone Palace and Estate to survive and grow, thereby securing its future and key contribution to Perthshire and Scotland's tourism offer and economy. A core document has been produced and submitted as supporting information in relation to these objections.

Circular 1/2010 On Planning Agreements states that;

11. Planning agreements should only be sought where they meet **all** of the following tests:

- necessary to make the proposed development acceptable in planning terms (paragraphs 12-14);
- serve a planning purpose (paragraph 15) and, where it is possible to identify infrastructure provision requirements in advance, should be relevant to development plans;
- relate to the proposed development either as a direct consequence of the development or arising from the cumulative impact of development in the area (paragraphs 16-17);
- fairly and reasonably relate in scale and kind to the proposed development (paragraphs 18-20) and be;
- reasonable in all other respects (paragraphs 21 & 22).

Therefore the request for contributions to existing open space must be based on these tests and only be requested where the development will create additional pressure on existing infrastructure.

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 Debbie Mackay, Smiths Gore on behalf of Scone Palace and Estate

Address and Postcode; Smiths Gore, 12 Bernard Street, Edinburgh, EH6 6PY

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:

Supplementary Guidance: **Yes _ Developer Contributions SPG**

SEA Environmental Report – Addendum 2:

SEA ER Addendum 2 – Appendices:

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

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

Policy ref.

or

Site ref.

or

Chapter

Page no.

Paragraph no.

4. What is your representation?

Are you supporting the Plan?

Or

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

The issues raised below should be taken into account to make the approach by Perth and Kinross Council to Developer Contributions more robust and practical.

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

This objection forms part of a suite of objections to the Proposed Plan, aimed at achieving a more positive and supportive policy context to enable Scone Palace and Estate to survive and grow, thereby securing its future and key contribution to Perthshire and Scotland's tourism offer and economy. A core document has been produced and submitted as supporting information in relation to these objections.

A number of development sites are being promoted by Scone Palace and Estate in order to support the core business of the Palace and other key features and economic initiatives of the Estate. It is vital that any developments are not made unviable by unrealistic levels of developer contribution.

The draft SPG is lacking in any further detail on wider categories of developer contribution and therefore it is impossible to get a full picture of the likely impact.

1) **Paragraph 1.4** does not give due recognition to the impact **existing communities** have on infrastructure. Scone Palace and Estate agree with Homes for Scotland's response which states that the methodology used to calculate the impact of new development on infrastructure and services should have regard to the net new impact, not simply total impact.

2) **2.6 Affordable Housing**. If developer contributions are not to be applied to affordable housing provided by RSLs then they should equally not be applied to the affordable housing element of private housing schemes. The double impact of both affordable requirements and developer contributions could render many schemes unviable in the current market.

3) 3.4 It is not usual for new guidance to be applied to **renewals of planning applications** and indeed could have a detrimental effect on the viability of scheme which has already been through planning at least once. This paragraph should be deleted.

4) **3.14 additional revenue costs**. This paragraph should be deleted. It is not acceptable in planning terms revenue contributions to items which operators can operate commercially.

5) **3.17 Commercial Viability**. The requirement for these viability statements to be treated with utmost confidentiality is essential.

6) Scone Palace objects to the requirement in paragraph 4.6 **Primary Education**, for developer contributions where primary schools are operating at or above 80% capacity. Both Homes for Scotland and A and J Stephen in their responses illustrate that this is too low a threshold. A and J Stephen shows this with reference specifically to Scone where new houses have not created more pupil numbers. Both Homes for Scotland and A and J Stephen quote two key Reporters decisions on appeals re education contributions and point out that in both cases the reporters did not agree with the method used by Perth and Kinross Council. This 80% capacity threshold is therefore inappropriate.

- 7) Paragraph 4.6 also states that where **primary school capacity** has been increased to meet the needs of new development resulting in it operating at below 80% of total capacity, contributions may be required from future development until a proportionate cost of the school improvements is received. We agree with Homes for Scotland that if there is no detriment being created by a development, then there can be no requirement to mitigate against it unless the Council has borrowed money to fund the works up front and is recouping it from developers. The paragraph should make this clear.
- 8) **Paragraph 4.8** implies that the **contributions towards education** could be spent in a different catchment area to that which it was collected in. This contravenes the scope of tests of planning purpose and should be deleted.
- 9) **Appendix 1 – Summary of Examples of Contributions** - This table creates considerable concern as it sets out a potential wish list which cumulatively could make a development unviable. Of particular concern is the potential for developments to be asked to contribute to health care infrastructure improvements which cannot be supported under legislation.
- 10) Care should be taken to avoid using developer contributions to deal with **existing deficiencies** in the current climate of cut-backs in the public sector.

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 Debbie Mackay, Smiths Gore on behalf of Scone Palace and Estate

Address and Postcode; Smiths Gore, 12 Bernard Street, Edinburgh, EH6 6PY

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:

Supplementary Guidance: **Yes _ Affordable Housing SPG**

SEA Environmental Report – Addendum 2:

SEA ER Addendum 2 – Appendices:

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

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

Policy ref.

or

Site ref.

or

Chapter

Page no.

Paragraph no.

4. What is your representation?

Are you supporting the Plan?

Or

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

The issues raised below should be taken into account to make the approach by Perth and Kinross Council to Affordable Housing more robust and practical.

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

This objection forms part of a suite of objections to the Proposed Plan, aimed at achieving a more positive and supportive policy context to enable Scone Palace and Estate to survive and grow, thereby securing its future and key contribution to Perthshire and Scotland's tourism offer and economy. A core document has been produced and submitted as supporting information in relation to these objections.

Scone Palace and Estate recognises the need for affordable housing provision across Perth and Kinross and is supportive of a clear statement of the policy approach to developer contributions towards affordable housing. Scone Palace and Estate is already a provider of affordable rural accommodation across its let properties. The comments below seek to achieve alterations to the policy to make it as flexible as possible and to enable the policy to adapt to the challenges of the current housing market.

Scone Palace supports Homes for Scotland submission in relation to the Affordable Housing Supplementary Planning Guidance.

The core issue is that the SPG should be considered in the context of Scottish Government Policy as set out in SPP para 87;

“Policies on affordable housing provision should be realistic and take into account considerations such as development viability and the availability of funding”.

Never has this been more pertinent than under current market conditions.

1) We would wish to see the phrase “**including conversions**” removed because conversions of traditional buildings are particularly difficult and expensive to undertake. Conversion to housing is a good way to ensure a future for many traditional and historic buildings that are otherwise redundant for their original use and not suited to modern needs. Therefore it is not wise to add further to the cost of conversion of these valued properties by requiring affordable housing provision as part of any development.

Scone Palace has a number of historic traditional farm steadings on the Estate which would lend themselves to conversion to housing but will be expensive projects to undertake. Additional costs such as contributions to affordable housing will make these projects potentially unviable resulting in these buildings remaining unused and gradually deteriorating to the point where they could be lost

2) In relation to the **25% requirement**, it is recognised that this is a national benchmark for affordable housing provision but it is also hugely important that the SPG reflects the current market position and does not hinder the development of market housing while funding and

solutions for the affordable housing element are explored. Such delays only serve to compound the problems of, the economy, the scarcities of housing generally and the need for affordable housing. The letter from Jim Mackinnon to the Heads of Planning on 15 March 2011-12-02 should be a significant consideration here. It states that;

"Authorities will also be aware of the significantly lower levels of public funding that are likely to be available to support the development of affordable housing in the coming years. In these circumstances I suggest that authorities, in drawing up and implementing planning policies on affordable housing, should consider:

- *Whether contributions of 25% or more are likely to be deliverable in the current economic climate. Levels of affordable housing requirement that act to stifle overall levels of housing development are likely to be counter-productive. In certain cases the effect could be that development would not proceed at all.*
- *The nature of affordable housing need in an area and the extent to which this can be met by proposals capable of development with little or no public subsidy. It is counter-productive to secure land for proposals requiring high levels of subsidy unless the authority is confident that a source for this subsidy can be identified".*

The key message for Local Authorities is that of flexibility and responsiveness to approaches to affordable housing.

3) The threshold of **5 units** and above being the trigger for affordable housing is a low benchmark in comparison to many other local authorities and we would suggest that t 10 units or above would be a more realistic and robust figure in the current market.

4) Section 4 on **Types of Affordable Housing**, should also allow for "private subsidised rented". The Scottish Government Rural Homes for Rent Initiative pioneered this approach very successfully and there may be opportunities for such schemes in the future, Therefore it is essential to ensure that the policy can cater for this approach. Again, the flexibility and innovation in approach to affordable provision encouraged by the Chief Planner is vital.

There should therefore be two additional categories added to the list in Section 4 as follows;

vi) Private Subsidised Rented – approaches similar to the Government Rural Homes for Rent scheme will be considered.

vii) Innovative Approaches to Provision of Affordable Housing – innovative approaches tot he provision of affordable housing will be explored and supported wherever possible.

5) Scone Palace and Estate disagrees with the **variation in thresholds for affordable housing in rural areas** which purports to take account of the difference in development size between urban and rural areas. But it also fails to take account of the fact that rural sites may also be more marginal in cost and sales terms and may therefore struggle to provide units on-site. The threshold should be the same for rural and urban areas.

6) Page 17 refers to the **payment of commuted sums into a fund to be administered by the Council** to facilitate meeting the need for affordable housing within the Perth and Kinross Council area including funding for a post for an officer to help the delivery of affordable housing and conduct negotiations with developers. This proposal clearly fails to meet the tests of Planning Circular 1/2010 Planning Agreements in that it is not; "necessary to make the proposed development acceptable in planning terms", does not "serve a planning purpose related to the use and development of land", is not related "to the development being proposed" and there is no "link between the development and any mitigation offered as part of the developer's contribution". Paragraphs 18 and 19 also apply as follows; "attempts to extract excessive contributions from developers towards the costs of infrastructure or to obtain extraneous benefits are unacceptable"

and “planning agreements should not be used to resolve existing deficiencies in infrastructure provision or to secure contributions to the achievement of wider planning objectives which are not strictly necessary to allow permission to be granted for the particular development”. Therefore the funding of an officers post would not fit with these requirements and this should be removed from the SPG.

7) Also on page 17, the mechanism for payment of commuted sums is discussed and the simplest mechanism is put forward as an **up-front payment**. The paragraph does state that where this is not possible it may be possible to stage the payment. It is vital that this scope for gradual payment is retained in the document. It would be extremely difficult for developers in the current economic climate to provide all of the money up-front.

8) We agree with the statement in the Homes for Scotland response in relation to **ring fencing** of money for 5 years. We disagree with the implied 12 month window in which developers can reclaim monies not spent. If these have not been spent than they should be returned and the onus should not be put on the development industry to pursue them.

9) The Estate concurs with Homes for Scotland’s concerns regarding the **Calculation of commuted sums** on page 18 and asks for the valuation issue to be resolved and reflected in the policy. The commuted sum payment model must take account of the income or capital receipts/increase in capital value, derived from the affordable development. **We suggest that the SPG must properly reflect this important issue**

10) Page 22 section 5.11 Houses for Private Rent states that **tied accommodation** or properties built by private Estates for essential estate workers and subject to occupancy restrictions may have a commuted sum applied retrospectively if a request for removal of the condition is applied for. It must be absolutely clear that this will only be the case where the unit has been treated initially as part of an affordable housing contribution.

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