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| Issue 6 | Tourism | |
| Development plan reference: | ED4 - Caravan Sites, Chalets and Timeshare Developments, page 27 ED5 - Major Tourism Resorts, page 28 8.1.17 – Strathearn Area Tourism, page 241 8.3.2 – Crieff Tourism, page 249 8.11.2 – Gleneagles Tourism, page 267 | Reporter: Hugh M Begg |
| Body or person(s) submitting a representation raising the issue (including reference number): | | |
| Graham Travers (00102) Councillor Michael Barnacle (02633) Scottish Natural Heritage (05211) Crieff Hydro Estate (07710) The Gleneagles Hotel (09004) Scone Palace & Estate (09163) Methven & District Community Council (09221) | | SSE plc (09311) Dall Estate (09313) Andrew Donaldson (09389) Alistair Godfrey (09941) Blairgowrie & Rattray Community Council (10002) |
| Provision of the development plan to which the issue relates: | Tourism related policies and supporting text | |
| Planning authority's summary of the representation(s): | | |
| <p><u>Policy ED4:Caravan Sites, Chalets and Timeshare Developments</u> Andrew Donaldson (09389/1/002): Policy ED4 fails to allow for any expansion of types of visitor accommodation not listed within caravan sites, camping sites, chalets, timeshare etc. The policy needs to be reworded so that opportunities exist to develop tourism with a range of accommodation types at any existing tourism accommodation facility.</p> <p>Crieff Hydro Estate (07710/3/001): Supports the principle of a specific policy for tourist accommodation but does not see the need or benefit of having a tourist accommodation policy for explicit forms of tourist accommodation, that is, caravan sites, chalets and timeshare developments. Policy ED4 is considered overly complex, restrictive and not user-friendly. It should be sufficiently flexible and responsive to the various forms of tourist accommodation that may emerge during the Plan period.</p> <p>Scottish Natural Heritage (05211/25/002): Policy ED4 should reflect the outcomes of the Habitats Regulations Appraisal, Table 8.1 (S4_Doc_132).</p> <p>Blairgowrie & Rattray Community Council (10002/1/005): Says that the LDP shows no provision of welcoming visitors. Concerned that the importance of tourism is mentioned but not sure how the development of housing on prime recreational countryside will be a benefit to tourism.</p> <p>Alistair Godfrey (09941/1/005); Councillor Michael Barnacle (02633/1/004): Support Policy ED4 as written.</p> <p><u>Policy ED5: Major Tourism Resorts</u> Graham Travers (00102/1/002): Perth City should be classified as a major tourist</p> | | |

attraction and added to list within Policy ED5. Facilities are needed to become the best in the country so Perth doesn't become a blighted road junction. Second best just means people spend their money somewhere else.

Dall Estate (09313/1/002): Supports the inclusion of Policy ED5 but object to the failure to recognise the potential of the Dall Estate as a future major tourism resort which could offer the range and quality of accommodation available at Crieff, Dunkeld and Gleneagles, and the new facilities planned at gWest and Taymouth Castle.

Alistair Godfrey (09941/1/006): Policy ED5 should refer to more than the five resorts that are mentioned. A wider recognition of tourist development across Perth and Kinross is also required. Policy ED5 refers to *'the improvement or expansion of these facilities'* including gWest, which has not been built. This statement needs to be corrected. This particular development appears in more detail in Chapter 8.9, p264 (S4_Doc_393). It does not have planning consent and should be an allocated site in line with other sites within the plan. The plan should recognise SPP paragraph 95 (S4_Doc_105) in relation to rural development: *'The aim is not to see small settlements lose their identity nor suburbanise the.....'*

Crieff Hydro Estate (07710/2/001): Welcomes Policy ED5 as it supports specific tourist resorts and that tourism is a key economic driver. The policy framework does however need to make sure that the vision and aspirations of such resorts becomes a reality. The landscape setting for the tourist resorts are integral to the offer. In the case of Crieff Hydro, its landscape does vary across the estate and this should allow for continued expansion.

A minor modification to Policy ED5 is proposed so that it acknowledges and responds to the variation of landscape quality and the ability for the landscape to absorb development in appropriate locations.

Scone Palace & Estate (09163/4/004): Policy ED5 does not define Major Tourism Resorts. It lists a small number of tourist resorts and singles them out for special attention. The resorts listed all provide bed spaces but this is not clear in the text. The list excludes one of Perthshire's premier tourist attraction; Scone Palace and Gardens which provides a significant input to the local economy.

Methven & District Community Council (09221/1/001): In advance of Supplementary Guidance on windfarms, they ask that the landscape setting of Gleneagles, gWest and Crieff Hydro be protected by a windfarm free zone, including Strathearn and its flanking hill slopes.

SSE plc (09311/1/002): SSE broadly supports the objective of Policy ED5 as the importance of the tourism receptors listed within the policy is widely understood. However, it is considered that the policy is overly restrictive and may present a policy presumption against development which may be found broadly environmentally acceptable. The policy presumes against development that would have the *'potential to adversely impact'* the landscape setting of the tourism receptors listed in this policy. Many development types could have a minor adverse impact upon the landscape setting of the receptors listed but could well be broadly acceptable.

Scottish Natural Heritage (05211/25/003): Policy ED5 should reflect the outcome of Table 8.1 of the Habitats Regulations Appraisal (S4_Doc_133).

The Gleneagles Hotel (09004/2/001): Policy ED5 is supported for its emphasis about protecting the resort facilities' landscape setting, which is integral to their tourism offer, will be protected from developments with the potential to adversely impact upon it. Policy ED5 sends out a very positive message about the value placed by the Council and the community at large, about the resorts as visitor attractions and economic development assets for Perth and Kinross and the wider economy.

Strathearn Area Spatial Strategy - Tourism

Crieff Hydro Estate (07710/8/001): Welcomes the recognition of tourism as a key economic driver and the explicit identification of Crieff Hydro as one of three important tourism developments within the Strathearn area. However the wording in paragraph 8.1.17 should be strengthened to demonstrate the Council's support and commitment to facilitating and enabling the continued growth and expansion of such important tourism developments.

Crieff Hydro Estate (07710/4/001): Crieff Hydro Ltd supports the identification of tourism as a spatial strategy consideration in Crieff and specifically that Crieff Hydro, is identified as a key driver to shaping the spatial strategy considerations within Crieff.

However, Crieff Hydro's contribution to the tourism economy is not only providing visitor accommodation as inferred by the wording within the Proposed Plan Chapter 8 Section 8.3 paragraph.8.3.2 (S4_Doc_401):

'...The Crieff Hydro Hotel, and the caravan site to the west of the town, are specifically identified for their contribution to the provision of visitor accommodation and should be retained for their current uses'

The Plan should recognise the importance of the tourism development at Crieff Hydro, and seek to both protect its status and provide a sufficiently flexible framework to enable it to be responsive to the changing needs and trends within the tourism and leisure market. Recommend modifying the Proposed Plan Chapter 8 p.249 para.8.3.2 by amending the third paragraph to read as follows:

'Tourism provides employment and brings visitors to the town. This improves the vitality and viability of Crieff and ensures the services and facilities can continue to be provided in the area. The Plan therefore seeks to promote and enhance existing and future tourist development in the area. The Crieff Hydro Hotel, and the caravan site to the west of the town, are specifically identified for their contribution to the provision of visitor accommodation,' Add 'with the Crieff Hydro Hotel additionally providing a wider and more extensive range of holiday accommodation, tourism and leisure facilities; they should therefore be' Delete 'retained' Add 'protected and enhanced'. Delete 'for their current uses'.

The Gleneagles Hotel (09004/9/001): Whilst there is support for the Plan's statement at the paragraph 8.11.2 about the village being included in the Garden and Designed Landscape relating to the Gleneagles Hotel, the hotel is of the view that there is a need to ensure that the hotel, its grounds and most importantly, its setting, is protected from development that may be to the future detriment of the overall quality of the hotel and its image as a location of high environmental quality. The last sentence of the paragraph 8.11.2 should be amended to reflect an important protection requirement, to read:
'The Plan also seeks to protect the immediate village setting around Gleneagles Hotel, including an area of open space to maintain the character and amenity of the settlement...'

The Gleneagles Hotel (09004/6/001): Supports Strathearn Area Spatial Strategy, on tourism – particularly the emphasis of seeking to protect and enhance tourism developments at Crieff Hydro, Gleneagles Hotel, Taymouth and gWest.

Modifications sought by those submitting representations:

Policy ED4: Caravan Sites, Chalets and Timeshare Developments

Andrew Donaldson (09389/1/002): Policy needs to be reworded so that opportunities exist to develop tourism with a range of accommodation types at any existing tourism accommodation facility.

Crieff Hydro Estate (07710/3/001): Modify Policy ED4 as follows:

Delete title of ‘*Caravan Sites, Chalets and Timeshare Developments*’ and replace with the title of ‘*Tourist Accommodation*’.

Delete text within Policy ED4A: ‘*Encouragement will be given to the retention and improvement of existing [Delete caravan and camping sites and add tourist accommodation] provided the improvements are compatible with adjoining land uses and the site makes a positive contribution to the local economy.*’

Delete text within Policy ED4B: ‘*Proposals for new or expanded [Delete transit and touring caravan and camping sites and tourist accommodation]*’.

Scottish Natural Heritage (05211/25/002): Insert the following text at the end of the ‘*In All Cases*’ section of Policy ED4:

‘Development proposals will only be approved where they will not result in adverse impacts, either individually or in combination, on the integrity of the River Tay Special Area of Conservation.

Where proposals are located close to a watercourse, which is part of or connects to the Special Area of Conservation, a Construction Method Statement should be provided for all aspects of the development to protect the watercourse from the impact of pollution and sediment, so as to ensure no adverse effects on the qualifying interests of the Special Area of Conservation. Other studies including an otter survey, drainage impact assessment and species protection plan, where appropriate, may be required.’

Blairgowrie & Rattray Community Council (10002/1/005): The LDP should plan for the provision of facilities for fishing, cycling, sightseeing and social heritage. The Plan should also support the establishment of tourism business without the loss of natural landscape and heritage.

Policy ED5: Major Tourism Resorts

Graham Travers (00102/1/002): Perth City should be identified as a major tourist resort in Policy ED5.

Dall Estate (09313/1/002): Dall Estate site should be identified as a brownfield opportunity site within the LDP with potential for it to be redeveloped as a key tourist destination resort with a range of mixed uses. The site should be included under Policy ED5 and the Proposals Map should be amended accordingly.

Alistair Godfrey (09941/1/006): More tourist attractions within Perth and Kinross should

be referred to within Policy ED; gWest should not be on the list as it is not yet built yet nor has planning permission and as a result the second sentence of Policy ED5 *'The improvement or expansion of these facilities will be encouraged'* should be corrected.

Crieff Hydro Estate (07710/2/001): Replace Policy ED5 to read as follows:

'The Plan area includes a number of significant resort complexes which play a significant role in the local, national and international tourism economy. The improvement or expansion of these facilities will be encouraged, and the landscape setting which is integral to their tourism offer will be protected from developments where there is the potential to adversely impact upon it. Specifically these major resorts are:

- a) Crieff Hydro*
- b) Dunkeld House*
- c) Gleneagles Hotel*
- d) gWest*
- e) Taymouth Castle Estate'*

Scone Palace & Estate (09163/4/004): The term *'Major Tourism Resorts'* should be defined. Scone Palace and Gardens should be added to the list of tourist resorts with Policy ED5 because of its significant role in the local, national and international tourism economy.

Methven & District Community Council (09221/1/001): The landscape setting of Gleneagles, gWest and Crieff Hydro including Strathearn and its flanking hill slopes should be protected by a windfarm free zone.

SSE plc (09311/1/002): Policy ED5 should be reworded to add *'potential to have an unacceptable adverse impact upon it'* within the second last sentence of the policy.

Scottish Natural Heritage (05211/25/003): It is recommended that the following text is added to the end of the Policy ED5 to safeguard the qualifying interests of the Natura 2000 sites:

'Development proposals will only be approved where they will not result in adverse impacts, either individually or in combination, on the integrity of the River Tay Special Area of Conservation and South Tayside Goose Roosts Special Protection Area.'

Strathearn Area Spatial Strategy - Tourism

Crieff Hydro Estate (07710/8/001): Modify the Proposed Plan Chapter 8 p.241 para.8.1.17 by amending the paragraph to read as follows:

'Crieff and Gleneagles are important tourism centres, attracting visitors to the area, providing accommodation and offering employment opportunities. The Plan recognises the importance of three tourism developments at Crieff Hydro, Gleneagles Hotel and gWest, and' Delete 'seeks to protect and enhance them' Add 'will protect and support the enhancement of these important tourism developments.'

Crieff Hydro Estate (07710/4/001): Modify the Proposed Plan Chapter 8 p.249 para.8.3.2 by amending the third paragraph to read as follows:

'Tourism provides employment and brings visitors to the town. This improves the vitality and viability of Crieff and ensures the services and facilities can continue to be provided in the area. The Plan therefore seeks to promote and enhance existing and future tourist

development in the area. The Crieff Hydro Hotel, and the caravan site to the west of the town, are specifically identified for their contribution to the provision of visitor accommodation,' Add 'with the Crieff Hydro Hotel additionally providing a wider and more extensive range of holiday accommodation, tourism and leisure facilities; they should therefore be' Delete 'retained' Add 'protected and enhanced'. Delete ' for their current uses.'

The Gleneagles Hotel (09004/9/001): Amend spatial strategy on tourism to protect the Gleneagles Hotel, its grounds and setting from development that would adversely affect the quality of the hotel and its image.

Summary of responses (including reasons) by planning authority:

Policy ED4:Caravan Sites, Chalets and Timeshare Developments

Andrew Donaldson (09389/1/002): Policy does not need to be reworded because it is considered that Policy ED4A adequately supports the improvement of existing caravanning and camping sites. This does not preclude possible expansion. Policy ED4C (a) also states that it supports the expansion of existing hotels, guest houses, chalet parks, caravan park and timeshares.

No modification is proposed to the Plan.

Crieff Hydro Estate (07710/3/001): Policy ED4 relates to the specific uses of Caravan Sites, Chalets and Timeshare Developments as they offer different characteristics to mainstream tourism. Changing the title to 'Tourist Accommodation' would involve including other uses such as B&B's; guest houses, public houses with rooms, self catering and serviced apartments, all of which are covered by Policies RD1 and RD2 (S4_Doc_394) of the LDP.

In addition Policy ED3 (Rural Business and Diversification) provides support for the expansion of rural tourist businesses.

No modification is proposed to the Plan.

Scottish Natural Heritage (05211/25/002): It is considered that amending Policy ED4 to incorporate the mitigation measures as set out in the Habitats Regulations Appraisal (including Appropriate Assessment) (S4_Doc_132) of the Proposed Plan, and detailed in the previous section would provide greater clarity and transparency for applicants as to which settlements and in what circumstances the provisions of the Plan's Policy NE1: International Nature Conservation Sites (S4_Doc_389) will apply for proposals arising under these policies. It would also set out what will be expected of them in making their planning application.

If the Reporter is so minded the suggested additional text by the respondent should be added to Policy ED4 as detailed in the 'Modifications Sought' section.

Blairgowrie & Rattray Community Council (10002/1/005): It is considered that the Plan adequately supports the establishment of tourism business and facilities without the loss of natural landscape and heritage through Policy ED3 Rural Business and Diversification (S4_Doc_395) and Policy PM1 (Placemaking) (S4_Doc_396). Policy ED3 supports the creation of new business in rural areas including visitor accommodation and additional tourism and recreational facilities. New tourism related development is supported where it improves the quality of new and existing facilities and allows a new market to be

exploited or extends the tourism season. Policy PM1 (S4_Doc_396) aims to ensure that all development including tourism development will contribute positively to the quality of the surrounding built and natural environment.

The above mentioned policies should be read as whole in conjunction with Policy ED4. It would also be inappropriate to identify specific tourist opportunities because the market could alter over time. It is considered that the policy is flexible enough to respond to the market.

No modification is proposed to the Plan.

Major Tourism Resorts (Policy ED5)

Graham Travers (00102/1/002): Perth City is not a major tourist resort unlike Gleneagles, Crieff Hydro etc. Perth is vitally important to supporting tourism as it provides accommodation, certain attractions as well as retail and commercial uses. Most of the venues and attractions within Perth are stand alone destinations with a predominantly single use and therefore do not form a resort.

No modification is proposed to the Plan.

Dall Estate (09313/1/002): Dall Estate is not classed as a major tourist resort because it does not offer the same level of accommodation and on-site leisure activities that the resorts on the list within Policy ED5 do, or will do on completion. Dall Estate is a tourist destination with its country house on Loch Rannoch and there are just three holiday homes within the estate. There are no on-site leisure based activities apart from fishing and shooting. There is a planning refusal (09/01273/IPM) (S4_Doc_433) for a major redevelopment of the estate to form a hotel with leisure and retail facilities including two golf courses etc. but until such a scheme is approved and under construction than it cannot be regarded as a major tourist resort. It cannot be allocated within the LDP as a brownfield opportunity site as the majority of the estate is greenfield.

No modification is proposed to the Plan.

Alistair Godfrey (09941/1/006): It is considered that there is a wider recognition of tourist development across Perth and Kinross within Policy ED4 rather than Policy ED5 which focuses on what are considered the 5 major tourism resorts within Perth and Kinross. There are numerous tourism destinations within Perth and Kinross but they are not of the same scale or offer the same range of facilities as those on the list of Policy ED5.

gWest in particular does benefit from planning permission (02/01500/OUT; 07/00625/REM (S4_Doc_434) and 09/01088/AML (S4_Doc_435) for a golf course, club house, hotel and housing) and development of certain elements of the proposal has already commenced. On the basis that development has commenced and the type and scale of the proposed development it is classified as a major tourist resort.

No modification is proposed to the Plan.

Scone Palace & Estate (09163/4/004): Scone Palace and Gardens has a significant role in the local, national and international tourism economy but it is not classed as a major tourist resort because it does not offer accommodation or the same level of service or leisure facilities as the resorts contained on the list within Policy ED5.

No modification is proposed to the Plan.

Crieff Hydro Estate (07710/2/001); Methven & District Community Council (09221/1/001): Policy ED5 (second sentence) already states that *'landscape setting will be protected from developments with the potential to adversely impact on it.'* Wind farm proposals are dealt with via the development management process and will be assessed against such LDP policies as ER1 (Renewable and Low Energy Generation) (S4_Doc_392) and ER6 (Managing Future Landscape to Conserve and enhance the Diversity and Quality of the area's landscape) (S4_Doc_397). It is these policies along with TAYplan Policy 6 (Energy and Waste/Resource Management Infrastructure) (S4_Doc_069) and SPP (Core_Doc_048) that will determine any planning proposals for windfarms at/near Gleneagles, gWest or Crieff Hydro. It is considered there is no requirement for a specific policy to prevent wind farm proposals at Gleneagles, gWest or Crieff Hydro, with adequate policies already in place and within the Proposed Plan.

No modification is proposed to the Plan.

SSE plc (09311/1/002): It is considered that the proposed additional word to Policy ED5 does not add any additional strength to Policy ED5.

No modification is proposed to the Plan.

Scottish Natural Heritage (05211/25/003): It is considered that amending Policy ED5 to incorporate the mitigation measures as set out in the Habitats Regulations Appraisal (including Appropriate Assessment) (S4_Doc_133) of the Proposed Plan, and detailed in the 'Modifications Sought' section would provide greater clarity and transparency for applicants as to which settlements and in what circumstances the provisions of the Plan's Policy NE1: International Nature Conservation Sites (S4_Doc_389) will apply for proposals arising under these policies. It would also set out what will be expected of them in making their planning application.

If the Reporter is so minded the suggested additional text by the respondent should be added to policy ED5 as detailed in the 'Modifications Sought' section.

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Crieff Hydro Estate (07710/8/001): It is considered that the additional wording proposed at paragraph 8.1.17 will not add any extra strength to the supporting text.

No modification is proposed to the Plan.

The Gleneagles Hotel (09004/9/001); Crieff Hydro Estate (07710/4/001): There is no requirement for a specific policy or supporting text to protect Gleneagles Hotel or Crieff Hydro Estate against inappropriate development. Adequate and robust policies ED3 (S4_Doc_395) and ED5 are already in place within the LDP to protect such resorts and support their improvement or expansion.

No modification is proposed to the Plan.

Reporter's conclusions:

Policy ED4: Caravan Sites, Chalets and Timeshare Developments

1. The primary focus of the respondents is on what amounts to tourism-related developments and the details of how support for such development will be provided by way of the Proposed Plan. It has been recommended under Issue 5 that the Proposed

Plan's glossary contain a definition of this term.

2. The starting point must be that land use policies of a local development plan cannot directly encourage and incentivise the establishment of quality tourism businesses which will offer employment to local people. However, Scottish Planning Policy (SPP) at paragraph 45 confirms that removing unnecessary planning barriers to business development and providing scope for expansion and growth is essential. In that context, as the Council has pointed out, Policy ED3: Rural Businesses and Diversification supports the creation of new business in rural areas and Policy PM1: Placemaking is drafted with the aim of ensuring that all development, including tourism-related development, will make a positive contribution to the quality of the surrounding built and natural environments.

3. Contrary to the Council's summary, Mr Donaldson's concern is that: "*Policy ED3 is restrictive and the wording needs to be clearer. Policy ED4 does not reflect the level of flexibility necessary to enable ED3 to be implemented for the range of potential business opportunities*". With the text of paragraph 3.3.6 in mind, the terms of Policy ED3 and Policy ED4 require to be read together. Policy ED3 and, in particular, its second paragraph is sufficiently widely drawn to cover tourism-related developments in rural areas. Accordingly, there is no need for the consequential amendments sought to Policy ED4.

4. Contrary to the reading of the plan by Crieff Hydro Estate, Policy ED4 is not a "*tourist accommodation policy*". As noted above, the policy should be read alongside Policy ED3 and, in particular, its second paragraph. Policy ED4 is concerned with the particular challenges posed by planning applications for caravan sites, chalets and timeshare developments. Seen in that light, the policy cannot be judged as "*overly complex, restrictive and not-user friendly*".

5. It would be helpful to amend Policy ED4 to incorporate the mitigation measures set out in the Habitats Regulations Appraisal because that would provide greater clarity and transparency for readers of the plan when they come to consider the application of Policy NE1: International Nature Conservation Sites.

Policy ED5: Major Tourism Resorts

6. The principal focus of concern from respondents is that some businesses and locations have not been included in the listing of what the Council has identified as "major tourism resorts". In response to a request for further information the council has stated that major tourism resorts as set out in Policy ED5 are locations or attractions considered to be of national and/or international importance, which are prominent within a particular landscape setting and have/will have a significant impact on the economy for Perth and Kinross and Scotland. The Council goes on to point out that the identified resorts rely heavily on their landscape setting as a key feature and as a result the policy seeks to protect them from potential developments that could have an adverse impact on their offer. The council has confirmed that the list of resorts in Policy ED5 does not mean they have been placed in a hierarchy above other tourist/visitor destinations within Perth and Kinross.

7. The first sentence of the policy is by way of preamble. That the Council should feel the need to include the second sentence suggests that it is unsure that the other policies of the plan, notably Policy ER6: Managing Future Landscape Change to Conserve and Enhance the Diversity and Quality of the Area's Landscape are sufficient to provide

general support for all tourism-related development including the 5 listed businesses. That is not the conclusion of this report. Indeed, the Council appears to agree with that conclusion at least as far as two of the resorts on the list are concerned since its evidence is that there is no requirement for a specific policy or supporting text to protect Gleneagles Hotel or Crieff Hydro Estate against inappropriate development and that Policies ED3 and ED5 would offer adequate protection and support their improvement or expansion.

8. Turning to the third sentence of Policy ED5, the commitment by the Council in the introductory text to Chapter 3 at paragraph 3.3.6 is to give general support for tourism-related developments. However, Policy ED5 gives particular support to 5 named large business ventures. It says that it has not created a hierarchy: but that is exactly what is identified with no clear reasoning identifying where the cut off is between major resorts and others. In these circumstances, it is perfectly understandable that concern has been expressed not only at the exclusion from the list of five of some other businesses and the vicinities within which they are sited but also to the inclusion of others including the resort known as gWest. It is inappropriate to give particular support to the commercial viability of one business venture rather than another. Indeed, the text at 3.3.6 confirms that is not the intention of the Council; and, as noted above, the Council has drawn attention to the terms of Policy ED3 which it regards as sufficient to support the improvement or expansion of at least two of the named businesses. All this leads to the conclusion that the third sentence of the policy runs contrary not only to relevant terms in SPP but also to the thrust of the Council's own evidence.

9. Drawing these matters together, Policy ED5 adds nothing to the achievement of the stated aims of the plan which cannot be achieved by way of its other policies when read as a whole. It has caused unnecessary concern to those who advocate the addition of other tourist attractions. Although a number of respondents have drawn attention to what they regard as fundamental deficiencies in the wording of Policy ED5 none of them has sought the removal of the policy from the Proposed Plan. Accordingly, the recommendation must be limited to sentence 3 of the policy.

Reporter's recommendations:

Policy ED4: Caravan Sites, Chalets and Timeshare Developments

1. In the section of the policy headed "In all cases" add the following text: "*Development proposals will only be approved where they will not result in adverse impacts, either individually or in combination, on the integrity of the River Tay Special Area of Conservation. Where proposals are located close to a watercourse, which is part of or connects to the Special Area of Conservation, a Construction Method Statement should be provided for all aspects of the development to protect the watercourse from the impact of pollution and sediment, so as to ensure no adverse effects on the qualifying interests of the Special Area of Conservation. Other studies including an otter survey, drainage impact assessment and species protection plan, where appropriate, may be required.*"

Policy ED5: Major Tourism Resorts

1. Delete sentence 3 of Policy ED5 including the five listed tourism resorts (a) to (e).