

Issue 8b	Settlement Boundaries	
Development plan reference:	Perth Area Landward Map, page 73 Highland Perthshire Area Landward Map, page 155-156 Kinross Area Landward Map, page 201 Strathmore and the Glens Landward Map, page 277	Reporter: David Buylla
Body or person(s) submitting a representation raising the issue (including reference number):		
Robert Hogg (00282) Peter Allan (00327) Alison Ramsay & Susan Fraser (00390) The Breas of the Carse Conservation Group (00391) Fiona Mead (00633) Portmoak Community Council (00638) Inchtute Community Council (00701) Mr & Mrs Mark Dall (00748) Mr & Mrs Thomas Dall (00749) Mr & Mrs O Ferry (00779) Mr & Mrs Richard Green (00858) Councillor Michael Barnacle (02633) Mr & Mrs Michael O'Kane (02865) A & J Stephen (Builders) Ltd (03068) Kinross-shire Civic Trust (06950) Culfargie Estates (07693/1) Dunan Estate (07693/3)		D Ironside (07693/8) Matthew Pease Architect (09125) Mr & Mrs M Sands (09142) John Buchan (09169) Danvers Valentine (09289/1) Patrick Sheriff (09289/2 & 09289/3) The Petrie Family (09289/4) Snaigow Estates (09289/11) Glen Quaich Estate (09289/15) Jamie Sinclair (09289/21) Carolyn Bell (09289/23) R T Hutton Planning Consultant (09539) Mr & Mrs Alexander Lindsay (09899) George Pease (10115) The Church of Scotland General Trustees (09167) The Harris Family (10220) Susan Forde (10332)
Provision of the development plan to which the issue relates:	Identification of boundaries for small settlements.	
Planning authority's summary of the representation(s):		
<p><u>Abernyste</u> Braes of the Carse Conservation Group (00391/1/005); A & J Stephen (Builders) Ltd (03068/2/001); Inchtute Community Council (00701/1/003): Object to the removal of the settlement boundary. Abernyste is larger and has more facilities than some other settlements which are to retain a boundary.</p> <p>Braes of the Carse Conservation Group (00391/1/005): A boundary provides certainty and its removal is an open invitation for development.</p> <p>Mr & Mrs M Sands (09142/4/001): Promoting a boundary which includes a site for residential development which would be a logical extension to the settlement. There is an urgent need for residential development to help safeguard the school, provide more rental accommodation and offer locals opportunity to purchase housing.</p> <p><u>Airntully</u> Snaigow Estates (09289/11/005): Airntully should have a settlement boundary to guide and inform future development. It is questioned as to why certain small settlements have a boundary whilst other equivalently sized settlements have not. A site is promoted for</p>		

residential development which is unconstrained in terms of the local road network, services are available and the landscape framework is suitable for limited development.

Amulree

Glen Quaich Estate (09289/15/003): LDP should retain a settlement boundary for Amulree to allow continuation of the preservation of the character of the settlement and protect against inappropriate development. Site being promoted for development has previously been identified as suitable for limited scale housing; it would have minimal adverse landscape impact, would provide private rented accommodation, would be close to sources of employment and would help provide a more sustainable future for Amulree.

Culfargie Estates (07693/1/001): There is an inconsistent approach to the identification of settlements and their boundaries. Disagree with the approach of using LDP policy RD3 (S4_Doc_418) rather than defining boundaries – all clearly recognisable settlements should have a defined boundary regardless of their size. Inclusion of a development site within an extended settlement boundary would allow for modest expansion and help meet the housing land requirement. The site proposed is a realistic opportunity for further limited development, it is accessible, topography would allow integration into the settlement, and building design and orientation would allow incorporation of sustainability measures.

Balado Crossroads

Councillor Michael Barnacle (02633/1/065): There is no justification for removing settlement boundaries within Loch Leven Catchment. The LDP MIR paragraph 4.2.32 (S4_Doc_223) suggested these would be retained. Small communities want certainty as to the parameters of their settlements. Concern at the potential for ribbon development and unauthorised development on settlement edges unless LDP policy RD3 (S4_Doc_418) is robustly enforced.

Ballindean

Alison Ramsay & Susan Fraser (00390/1/004): Support not having settlement boundaries for small settlements but only if LDP policy RD3 (S4_Doc_418) is robust and rigorously applied. If the policy is changed or relaxed then a tight boundary should be drawn round Ballindean to allow for limited future infill development appropriate in scale to the size of the village.

Ballintuim

The Petrie Family (09289/4/003): A settlement boundary for Ballintuim should be retained and amended to accommodate a site to the west which would help ensure the viability and sustainability of the settlement.

Blairforge

Councillor Michael Barnacle (02633/1/066): Small communities want certainty as to the parameters of their settlements. Concern at the potential for ribbon development and unauthorised development on settlement edges unless LDP policy RD3 (S4_Doc_418) is robustly enforced.

Collace

Jamie Sinclair (09289/21/001): Planning consent has been granted for housing which brings Collace to a scale which justifies retaining a settlement boundary to guide and inform future development. Further modest expansion would allow the possibility of connection to a public sewerage system. Question why the boundary for Collace has been removed whilst a boundary is included for nearby Damside/Saucher.

Craigowmill

Kinross-shire Civic Trust (06950/1/012): LDP should reinstate the settlement boundary. Craigowmill is within the current Area of Great Landscape Value and LDP policy RD3 (S4_Doc_418) will not guarantee its protection.

Councillor Michael Barnacle (02633/1/067): There is no justification for removing settlement boundaries within Loch Leven Catchment. The LDP MIR paragraph 4.2.32 (S4_Doc_223) suggested these would be retained. Small communities want certainty as to the parameters of their settlements. Concern at the potential for ribbon development and unauthorised development on settlement edges unless LDP policy RD3 (S4_Doc_418) is robustly enforced.

Cuthil Towers

Councillor Michael Barnacle (02633/1/068): Small communities want certainty as to the parameters of their settlements. Concern at the potential for ribbon development and unauthorised development on settlement edges unless LDP policy RD3 (S4_Doc_418) is robustly enforced.

Easter Balgedie

Robert Hogg (00282/1/001); Kinross-shire Civic Trust (06950/1/013); Fiona Mead (00633/1/001); Portmoak Community Council (00638/2/003); Mr & Mrs Alexander Lindsay (09899/1/001); Susan Forde (10332/1/003); Mr & Mrs Mark Dall (00748/1/001); Mr & Mrs Richard Green (00858/1/001); Mr & Mrs Thomas Dall (00749/1/001); Councillor Michael Barnacle (02633/1/069): Object to removal of the settlement boundary on some or all of the following grounds: removal of the boundary will lead for further opportunities for additional development detracting from the surroundings, increasing risk of accidents, and increasing contamination of Loch Leven; it is within the current Area of Great Landscape Value and the open countryside and unspoilt landscape is a visitor attraction (the failure to produce a replacement for the Area of Great Landscape Value alongside the LDP increases uncertainty and lack of confidence); building outside the settlement boundaries would take away from the attraction of the area to tourists; additional development would adversely affect existing businesses; the settlement has a naturally defined boundary; LDP policy RD3 (S4_Doc_418) is not sufficiently robust to offer protection from expansion into the countryside, from infill, ribbon development, or from development adjacent to existing settlement edges; Easter Balgedie is unique within the Portmoak area as it contains three working farms; the existing boundary has proved effective at containing new development and preventing housing development on adjacent fields; it will encourage future development of greenfield sites and agricultural land in this rural area; more development would increase the accident risk on the A911; small communities want certainty as to the parameters of their settlements; other similar sized settlements have boundaries; boundaries have been retained for all the villages on the eastern side of Loch Leven; inconsistency with the treatment of Kilmagadwood where a new boundary has been created to prevent development between there and Scotlandwell but it is equally important to prevent development between Easter and Wester Balgedie and between Easter Balgedie and Kinnesswood; and there is no justification for removing settlement boundaries within Loch Leven Catchment – the LDP MIR paragraph 4.2.32 (S4_Doc_223) suggested these would be retained.

Mr & Mrs Michael O'Kane (02865/1/001): Support the removal of the boundary. The previous boundary was subjective and the hamlet can be protected against undesirable development by other policies.

Gairney Bank

Councillor Michael Barnacle (02633/1/070): There is no justification for removing settlement boundaries within Loch Leven Catchment. The LDP MIR paragraph 4.2.32 (S4_Doc_223) suggested these would be retained. Small communities want certainty as to the parameters of their settlements. Concern at the potential for ribbon development and unauthorised development on settlement edges unless LDP policy RD3 (S4_Doc_418) is robustly enforced.

Gairneybridge/Fruix

Kinross-shire Civic Trust (06950/1/014): LDP should reinstate the settlement boundary to prevent further expansion into agricultural land. LDP policy RD3 (S4_Doc_418) will not guarantee its protection.

Councillor Michael Barnacle (02633/1/071): There is no justification for removing settlement boundaries within Loch Leven Catchment. The LDP MIR paragraph 4.2.32 (S4_Doc_223) suggested these would be retained. Small communities want certainty as to the parameters of their settlements. Concern at the potential for ribbon development and unauthorised development on settlement edges unless LDP policy RD3 (S4_Doc_418) is robustly enforced.

Lawers

D Ironside (07693/8/002): There is an inconsistent approach to the identification of settlements. Disagree with the approach of using LDP policy RD3 (S4_Doc_418) rather than defining boundaries – all clearly recognisable settlements should have a defined boundary regardless of their size. Inclusion of a development site within an extended boundary would allow for modest expansion and growth. Site is a realistic opportunity for further limited development and would tie in with existing building pattern, character and boundaries of the existing group.

Keltneyburn

Danvers Valentine (09289/1/002): Object to exclusion of an identified settlement boundary for Keltneyburn as there is scope for limited infill development. The site proposed would logically round off the settlement without impact on the character and would support the viability of the local community. Mitigation and enhancement measures would allow the site to be developed.

Lochran Sidings

Councillor Michael Barnacle (02633/1/072): Small communities want certainty as to the parameters of their settlements. Concern at the potential for ribbon development and unauthorised development on settlement edges unless LDP policy RD3 (S4_Doc_418) is robustly enforced.

Mawcarse

R T Hutton Planning Consultant (09539/5/001): Disappointed LDP does not include a settlement boundary for Mawcarse when other smaller settlements have boundaries. Planning consent has been granted for development in the north western edge and defining a settlement boundary which includes an area immediately south of this would allow a rounding off of the village and a better settlement edge. The site is free of constraints, is effective and would contribute to the land supply in the Kinross area.

Councillor Michael Barnacle (02633/1/073): There is no justification for removing settlement boundaries within Loch Leven Catchment. The LDP MIR paragraph 4.2.32 (S4_Doc_223) suggested these would be retained. Small communities want certainty as

to the parameters of their settlements. Concern at the potential for ribbon development and unauthorised development on settlement edges unless LDP policy RD3 (S4_Doc_418) is robustly enforced.

Middleton

Councillor Michael Barnacle (02633/1/074): There is no justification for removing settlement boundaries within Loch Leven Catchment. The LDP MIR paragraph 4.2.32 (S4_Doc_223) suggested these would be retained. Small communities want certainty as to the parameters of their settlements. Concern at the potential for ribbon development and unauthorised development on settlement edges unless LDP policy RD3 (S4_Doc_418) is robustly enforced.

Netherhall Farm, West of Milnathort

R T Hutton Planning Consultant (09539/3/001): Planning consent was granted to convert the steading to 5 houses and a settlement boundary should be identified around this area and Netherhall Cottage to the north. The area in-between would round off the development and contribute to the effective housing land supply. Access, surface water discharge and foul drainage could be satisfactorily provided.

Netherton

Councillor Michael Barnacle (02633/1/075): There is no justification for removing settlement boundaries within Loch Leven Catchment. The LDP MIR paragraph 4.2.32 (S4_Doc_223) suggested these would be retained. Small communities want certainty as to the parameters of their settlements. Concern at the potential for ribbon development and unauthorised development on settlement edges unless LDP policy RD3 (S4_Doc_418) is robustly enforced.

New Fargie

Mr & Mrs O Ferry (00779/1/001): New Fargie meets the criteria of LDP policy RD3 (S4_Doc_418) as a self-contained group of buildings and has opportunities for single house infill developments and conversions which would provide linkages and cohesion to the settlement. For clarity the boundaries of significant building groups like New Fargie should be defined. SPP (Core_Doc_048) encourages supportive attitude towards appropriate rural development and past planning decisions indicate acknowledgement of acceptability of residential development. Development in this location is sustainable as it is close to existing centres, transportation routes and major employment areas, the site is immediately available for development, development will not cause undue disruption to the community, site is visually contained and building orientation and design will maximise sustainability opportunities and integrate development into the landscape.

Pitnacree

Patrick Sheriff (09289/3/003): Object to the proposed loss of a settlement boundary at Pitnacree. Retention would protect the character and identity of the settlement encouraged in SPP (Core_Doc_048) whilst providing assurance and robustness for proposals seeking to provide for small scale development. Housing pattern in Highland comprises many small scattered settlements and identification of boundaries provides a sound basis for LDP policy PM1A (S4_Doc_396).

Rannoch Station

Dunan Estate (07693/3/001): There is an inconsistent approach to the identification of settlements and their boundaries. Disagree with the approach of using LDP policy RD3 (S4_Doc_418) rather than defining boundaries. All clearly recognisable settlements regardless of size should have a boundary. LDP should identify a range of small sites to

spread impact of development and help increase competition and choice for small house builders, self build projects and new home buyers, and also help sustain existing communities. Inclusion of the site proposed would allow for modest expansion of the settlement and could help meeting housing land requirement. Site topography would allow integration with the settlement, and building orientation would maximise energy efficiency measures.

Tenandry

The Church of Scotland General Trustees (09167/9/001): The LDP should recognise Tenandry as a settlement. The proposed sites can be sensitively developed for housing round the existing buildings to establish a small settlement. The sites are effective (refer PAN 2/2010 paragraph 55 (S4_Doc_609)): the landowner wishes to see them developed; uneven topography mean residential development and access points will be carefully sited, there are no known flood risks; no known contamination issues; no public funding required; there is a market for new open-market housing in the area; and there are no known deficiencies in infrastructure provision. Further, there are no listed buildings or evidence of any archaeological interest and an ecological study will be undertaken. The aim is to provide sustainable dwellings in large plots benefitting from the location, respecting local built and natural heritage and fitting with existing landscape and features. The existing buildings and the proposed sites at Tenandry should also be excluded from the National Scenic Area.

Tulloch of Ballechin

Patrick Sheriff (09289/2/002): The lack of an identified settlement boundary for Tulloch of Ballechin introduces uncertainty. Concern that LDP policy RD3 (S4_Doc_418) is subjective and proposals for minor expansion may not be supported even though these would effectively consolidate and enhance the existing clachan.

Upper Tillyrie

Councillor Michael Barnacle (02633/1/076): There is no justification for removing settlement boundaries within Loch Leven Catchment. The LDP MIR paragraph 4.2.32 (S4_Doc_223) suggested these would be retained. Small communities want certainty as to the parameters of their settlements. Concern at the potential for ribbon development and unauthorised development on settlement edges unless LDP policy RD3 (S4_Doc_418) is robustly enforced.

West Myreriggs

Carolyn Bell (09289/23/001): The number of MIR representations indicates that a range of development proposals are being considered by landowners and the provision of a settlement boundary would help guide and inform future development. MIR site 798 (S4_Doc_289) provides a logical and immediately deliverable expansion of the settlement. It can be easily accessed and serviced and would consolidate the settlement form. The Strathmore Area has had past difficulties in housing delivery. Part of the LDP enabling process is the provision of a range of site types/locations for different market sectors.

Non-Settlement Specific Comments

D Ironside (07693/8/001); Culfargie Estates (07693/1/002): Identifying settlement boundaries is particularly important in Highland given the number of small settlements. The LDP should identify a wide range of small sites in all Highland settlements to help meet the requirement for windfall and small sites, spread the impact of development, increase competition and choice, and help sustain communities.

George Pease (10115/1/002); Matthew Pease Architect (09125/1/002): The removal of settlement boundaries lays all 'building groups' (under LDP policy RD3a (S4_Doc_418)) vulnerable to pressure for expansion. Settlement boundaries should therefore be restored.

The Breas of the Carse Conservation Group (00391/1/006); Inchtute Community Council (00701/1/002): Support principle of not identifying settlement boundaries for smallest settlements but only if the Housing in the Countryside Supplementary Guidance (Core_Doc_064) is adopted into the LDP and is consistently and rigorously applied.

The Breas of the Carse Conservation Group (00391/1/006): If LDP policy RD3 (S4_Doc_418) is relaxed then tight settlement boundaries should be drawn round existing built areas.

Danvers Valentine (09289/1/001; Patrick Sheriff (09289/3/001); The Petrie Family (09289/4/002): Object to the Council's reliance on LDP policy RD3 (S4_Doc_418) where there is no settlement boundary. Implementation of the policy is objective. Settlement boundaries provide greater clarity.

Kinross-shire Civic Trust (06950/1/010): There is no equivalent in the LDP to Policy 48 of the Kinross Area Local Plan (S4_Doc_290) which defines a settlement boundary and explains that no development will be permitted outside this boundary. The LDP is supposed to provide sufficient housing land to meet growth figures so it is illogical to remove settlement boundaries to provide more flexibility in the provision of housing around these settlements. Such settlements are often surrounded by good quality agricultural land which should be preserved. Expansion in small rural settlements is against the sustainability policy of the Plan which aims to reduce long distance commuting.

Peter Allan (00327/4/001): The absence of a settlement boundary is an invitation to put forward small sites designed to meet the identified need and the contribution assumptions in the LDP. However the LDP (chapter 6 specifically mentioned) does not offer any clear support for this, the implication being that land may come forward only through development management in terms of LDP policy RD3 (S4_Doc_418). Additional wording is suggested.

Proposed Settlement Extensions

John Buchan (09169/1/001): Proposes a settlement extension to the west end of Clathy. The existing boundary is erroneous and artificial. Site shown on submitted plan should also be included in the LDP as suitable for housing.

The Harris Family (10220/1/001): Disagree with strategy to direct majority of development to principle settlements and that within small settlements boundaries are drawn tightly to limit development opportunities. Development of the site proposed would give the possibility of road widening and provision of a pavement and cycle track. Other proposals for development in Campmuir would be sporadic and would not offer these potential benefits. There is demand for new housing in Campmuir and failure to allow modest development will result in ad hoc applications for individual houses. There needs to be supply of housing varying in size and cost. Site could come forward as windfall.

Modifications sought by those submitting representations:Abernyte

The Braes of the Carse Conservation Group (00391/1/005); Inchtute Community Council (00701/1/003): The LDP should reinstate the settlement boundary for Abernyte (S4_Doc_610).

A & J Stephen (Builders) Ltd (03068/2/001): LDP should identify a settlement boundary for Abernyte which includes a site for a single plot on the north west boundary (S4_Doc_610).

Mr & Mrs M Sands (09142/4/001): LDP should identify a settlement boundary for Abernyte and identify the site shown on the submitted plan for residential development (S4_Doc_610).

Airntully

Snaigow Estates (09289/11/005): The LDP should identify a settlement boundary for Airntully as proposed by the draft Perth Area and Central Area Local Plan 2004 (as shown on the submitted plan) which includes a site to the north for residential development. An explanation should be given as to why certain small settlements have a boundary whilst other equivalently sized settlements have not.

Amulree

Glen Quaich Estate (09289/15/003): The LDP should reinstate the settlement boundary for Amulree (S4_Doc_611) which includes the site being promoted in the representation for housing development.

Culfargie Estates (07693/1/001): The LDP should identify a settlement boundary which includes the site to the north for residential development (S4_Doc_611).

Balado Crossroads

Councillor Michael Barnacle (02633/1/065): The LDP should reinstate the settlement boundary for Balado Crossroads as per the Kinross Area Local Plan 2004 page 87 (S4_Doc_615).

Ballindean

Susan Fraser & Alison Ramsay (00390/1/004): If LDP policy RD3 (S4_Doc_418) changed or relaxed then a tight boundary should be drawn round Ballindean. For information S4_Doc_627 shows the boundary which was proposed for Ballindean in the Perth Area Draft Local Plan 2004.

Ballintuim

The Petrie Family (09289/4/003): The LDP should identify a settlement boundary for Ballintuim which includes the site shown on the submitted plan (S4_Doc_638).

Blairforge

Councillor Michael Barnacle (02633/1/066): The LDP should reinstate the settlement boundary for Blairforge as per the Kinross Area Local Plan 2004 page 88 (S4_Doc_616).

Collace

Jamie Sinclair (09289/21/001): The LDP should identify a settlement boundary for Collace as per the submitted plan which includes a site for residential development. Explanation should be given as to why the boundary for Collace has been removed whilst

a boundary is included for nearby Damside/Saucher.

Craigowmill

Kinross-shire Civic Trust (06950/1/012); Councillor Michael Barnacle (02633/1/067): The LDP should reinstate the settlement boundary for Craigowmill as per the Kinross Area Local Plan 2004 page 90 (S4_Doc_617).

Cuthill Towers

Councillor Michael Barnacle (02633/1/068): The LDP should reinstate the settlement boundary for Cuthill Towers as per the Kinross Area Local Plan 2004 page 91 (S4_Doc_618).

Easter Balgedie

Robert Hogg (00282/1/001); Kinross-shire Civic Trust (06950/1/013); Fiona Mead (00633/1/001); Portmoak Community Council (00638/2/003); Mr & Mrs Alexander Lindsay (09899/1/001); Susan Forde (10332/1/003); Mr & Mrs Mark Dall (00748/1/001); Mr & Mrs Richard Green (00858/1/001); Mr & Mrs Thomas Dall (00749/1/001); Councillor Michael Barnacle (02633/1/069): The LDP should reinstate the settlement boundary for Easter Balgedie as per the Kinross Area Local Plan 2004 page 93 (S4_Doc_619).

Gairney Bank

Councillor Michael Barnacle (02633/1/070): The LDP should reinstate the settlement boundary for Gairney Bank as per the Kinross Area Local Plan 2004 page 94 (S4_Doc_620).

Gairneybridge/Fruix

Kinross-shire Civic Trust (06950/1/014); Councillor Michael Barnacle (02633/1/071): The LDP should reinstate the settlement boundary for Gairneybridge/Fruix as per the Kinross Area Local Plan 2004 page 95 (S4_Doc_621).

Lawers

D Ironside (07693/8/002): The LDP should identify a settlement boundary for Lawers which includes the site on the submitted plan for residential development.

Keltneyburn

Danvers Valentine (09289/1/002): The LDP should identify a settlement boundary for Keltneyburn as per submitted plan which includes sites to the south and west for housing (S4_Doc_614).

Lochran Sidings

Councillor Michael Barnacle (02633/1/072): The LDP should reinstate the settlement boundary for Lochran Sidings as per the Kinross Area Local Plan 2004 page 97 (S4_Doc_622).

Mawcarse

Councillor Michael Barnacle (02633/1/073): The LDP should reinstate the settlement boundary for Mawcarse (S4_Doc_623).

R T Hutton Planning Consultant (09539/5/001): The LDP should identify a settlement boundary for Mawcarse which includes an area to the south for residential development (S4_Doc_623).

Middleton

Councillor Michael Barnacle (02633/1/074): The LDP should reinstate the settlement boundary for Middleton as per the Kinross Area Local Plan 2004 page 99 (S4_Doc_624).

Netherhall Farm, West of Milnathort

R T Hutton Planning Consultant (09539/3/001): The LDP should identify a settlement boundary around the steading conversion at Netherhall Farm, West of Milnathort and the land to the north for housing as shown on submitted plan.

Netherton

Councillor Michael Barnacle (02633/1/075): The LDP should reinstate the settlement boundary for Netherton as per the Kinross Area Local Plan 2004 page 100 (S4_Doc_625).

New Fargie

Mr & Mrs O Ferry (00779/1/001): The LDP should identify a settlement boundary for New Fargie with a settlement statement and map (as per submitted plan) and a clear statement that it, and the site being promoted in the representation, is suitable for housing. It should be included within the list of settlements.

Pitnacree

Patrick Sheriff (09289/3/003): Not explicitly stated but implied that the LDP should reinstate the settlement boundary for Pitnacree as per the Highland Area Local Plan 2000 page 103 (S4_Doc_612).

Rannoch Station

Dunan Estate (07693/3/001): The LDP should identify a settlement boundary for Rannoch Station and identify the site subject of planning application 10/01977/FLL (S4_Doc_629) for housing. No specific boundary is proposed.

Tenandry

The Church of Scotland General Trustees (09167/9/001): The LDP should identify a settlement boundary for Tenandry. No specific boundary is proposed. Sites on submitted plan at Tenandry Glebe, or parts thereof, should be allocated for housing. Existing buildings and proposed sites should be removed from the National Scenic Area designation.

Tulloch of Ballechin

Patrick Sheriff (09289/2/002): It is assumed that a settlement boundary is sought for Tulloch of Ballechin but no specific modification or boundary is proposed. For information (S4_Doc_613) shows the existing Highland Area Local Plan 2000 boundary.

Upper Tillyrie

Councillor Michael Barnacle (02633/1/076): The LDP should reinstate the settlement boundary for Upper Tillyrie as per the Kinross Area Local Plan 2004 page 102 (S4_Doc_626).

West Myreriggs

Carolyn Bell (09289/23/001): The LDP should identify a settlement boundary for West Myreriggs as per the existing Local Plan (S4_Doc_628) but extended to include MIR site 798 (S4_Doc_289) for residential development.

Non-Settlement Specific Comments

D Ironside (07693/8/001); Culfargie Estates (07693/1/002): All clearly recognisable settlements should have a defined boundary, especially in the Highland area. The specific settlements are not identified.

George Pease (10115/1/002); Matthew Pease Architect (09125/1/002): Small settlement boundaries should be re-instated.

The Braes of the Carse Conservation Group (00391/1/006): If the Housing in the Countryside Supplementary Guidance (Core_Doc_064) is relaxed tight settlement boundaries should be drawn round existing built areas.

Inchtute Community Council (00701/1/002): 2009 Housing in the Countryside Policy (Core_Doc_064) should be incorporated as supplementary guidance to the LDP.

Danvers Valentine (09289/1/001); Patrick Sheriff (09289/3/001); The Petrie Family (09289/4/002): No specific modification sought but is assumed that those making representations wish that settlement boundaries are reinstated.

Kinross-shire Civic Trust (06950/1/010): No specific modification sought but is assumed that the Civic Trust wish existing settlement boundaries in Kinross-shire to be reinstated and a policy similar to policy 48 of the Kinross Area Local Plan (S4_Doc_290) to be included in the LDP.

Peter Allan (00327/4/001): Following wording should be added following LDP paragraph 6.1.12 (S4_Doc_509): *'Where settlement boundaries have been identified, the presumption is that any future development will take place within those boundaries. Settlement boundaries have not been drawn for a number of small settlements in the landward area thus removing the restrictive policy in the present local plan which stated that built development should not be located adjoining and outwith those settlements which are the subject of inset maps. The development of small sites within or adjacent to these small villages and hamlets will be encouraged. Criteria (a) and (b) of Policy RD3 will be deemed to have been met in such cases but otherwise development will be controlled by the published SPG on Housing in the Countryside with regard to criteria a) - m) in the section headed 'For All Proposals'.*

Proposed Settlement Extensions

John Buchan (09169/1/001): Settlement boundary at Clathy should be extended to include the 6 houses to the western end.

The Harris Family (10220/1/001): Settlement boundary at Campmuir should be extended to accommodate housing as per submitted plan.

Summary of responses (including reasons) by planning authority:

In order to avoid significant repetition the first part of the planning authority's response deals with the main issues which have been raised in the representations across all the settlements. Any additional settlement specific comments are given in the second part of the response.

Objection to the Removal or Non-identification of Settlement Boundaries

Braes of the Carse Conservation Group (00391/1/005); A & J Stephen (Builders) Ltd (03068/2/001); Inchtute Community Council (00701/1/003); Mr & Mrs M Sands

(09142/4/001); Snaigow Estates (09289/11/005); Glen Quaich Estate (09289/15/003); Culfargie Estates (07693/1/001 & 07693/1/002); Councillor Michael Barnacle (02633/1/065, 02633/1/066, 02633/1/067, 02633/1/068, 02633/1/069, 02633/1/070, 02633/1/071, 02633/1/072, 02633/1/073, 02633/1/074, 02633/1/075 & 02633/1/076); The Petrie Family (09289/4/002 & 09289/4/003); Jamie Sinclair (09289/21/001); Kinross-shire Civic Trust (06950/1/010, 06950/1/012, 06950/1/013 & 06950/1/014); Robert Hogg (00282/1/001); Fiona Mead (00633/1/001); Portmoak Community Council (00638/2/003); Mr & Mrs Alexander Lindsay (09899/1/001); Susan Forde (10332/1/003); Mr & Mrs Mark Dall (00748/1/001); Mr & Mrs Richard Green (00858/1/001); Mr & Mrs Thomas Dall (00749/1/001); D Ironside (07693/8/001 & 07693/8/002); Danvers Valentine (09289/1/001 & 09289/1/002); R T Hutton Planning Consultant (09539/3/001 & 09539/5/001); Mr & Mrs O Ferry (00779/1/001); Patrick Sheriff (09289/2/002, 09289/3/001 & 09289/3/003); Dunan Estate (07693/3/001); The Church of Scotland General Trustees (09167/9/001); Carolyn Bell (09289/23/001); George Pease (10115/1/002); Matthew Pease Architect (09125/1/002): Both communities and promoters of development are seeking the identification or reinstatement of settlement boundaries as there is a perception that these provide more certainty and clarity than a reliance on LDP policy RD3 (S4_Doc_418). Many of the small settlement communities are concerned that settlement boundaries offer protection against inappropriate development and without a boundary development will be allowed to sprawl. Developers and landowners want settlement boundaries to guide and inform future development and are concerned that Policy RD3 may be used to reject development.

Scottish Ministers expect LDPs to be '*concise map-based documents*' and the use of supplementary guidance is encouraged (Circular 1/09 paragraph 39 (S4_Doc_524)). It is therefore considered appropriate to have reduced the number of small settlements which have an identified settlement boundary in the Plan and instead to use Policy RD3: Housing in the Countryside and the detailed associated supplementary guidance (Core_Doc_064) as a means of assessing proposals for development in these settlements.

It is often very difficult to identify meaningful boundaries for small settlements due to the more dispersed nature of many of such settlements, especially in the Highland Area. It is therefore considered that using Policy RD3 to assess applications for development in these small settlements is more appropriate and will allow proposals to first and foremost be assessed against their suitability and fit within, and their impact upon, an existing building group rather than being almost deemed acceptable in principle because the proposal is within a settlement boundary line. Using Policy RD3 to guide development will allow these small settlements to grow more naturally than determining where development is/is not appropriate based on what can be an arbitrary line. It is considered important to allow small rural settlements to grow in accordance with SPP paragraph 92 (S4_Doc_107) which states that planning authorities should aim to "*enable development in all rural areas which supports prosperous and sustainable communities*". In relation to concerns of development sprawl the policy clearly states that ribbon development will not be supported. Other forms of expansion e.g. onto 'definable sites' should not be presumed against if they are acceptable in terms of the policy. The Council disagrees that the lack of a boundary introduces uncertainty or that Policy RD3 is not sufficiently robust to give the necessary protection to existing settlement edges or to prevent settlement coalescence. Nor does the Council agree that it will encourage future development of greenfield sites and agricultural land in rural areas. The policy and supplementary guidance together with other LDP policies such as ER6: Managing Future Landscape Change (S4_Doc_397) are considered to provide a detailed and comprehensive framework for determining planning applications giving all the advice

necessary to guide development and advise where development will and will not be acceptable and in what form.

No modification is proposed to the Plan.

Inconsistency in how Settlement Boundaries have been defined

Braes of the Carse Conservation Group (00391/1/005); A & J Stephen (Builders) Ltd (03068/2/001); Inchtute Community Council (00701/1/003); Snaigow Estates (09289/11/005); Culfargie Estates (07693/1/001); Jamie Sinclair (09289/21/001); D Ironside (07693/8/002); R T Hutton Planning Consultant (09539/5/001); Dunan Estate (07693/3/001); Fiona Mead (00633/1/001); Portmoak Community Council (00638/2/003); Mr & Mrs Mark Dall (00748/1/001); Mr & Mrs Alexander Lindsay (09899/1/001): Understandably comparisons have been drawn in the representations between those settlements which have a boundary and those which do not. Whilst settlement size was an important consideration decisions were not simply based on a pre-determined size limit. Instead each settlement was considered on its own merits taking account of the relative significance of that settlement in its particular location in terms of the range and type of facilities such as schools, shops or community facilities, and its overall size and number of houses. The scope for expansion of each settlement in terms of available sites and the ability to sustain additional development were also taken into account. When many of the boundaries were identified for the smallest settlements through the existing suite of Local Plans (1995-2004) the Housing in the Countryside Policy was less detailed and provided less guidance than LDP policy RD3 (S4_Doc_418) and associated Supplementary Guidance (Core_Doc_064). When reviewed therefore some settlements which previously had an identified boundary but which are of a more dispersed nature were considered to be more meaningfully served by the more detailed policy provision provided by Policy RD3 and the associated supplementary guidance than by a settlement boundary.

No modification is proposed to the Plan.

Allocation of Specific Sites for Development

Mr & Mrs M Sands (09142/4/001); Snaigow Estates (09289/11/005); Glen Quaich Estate (09289/15/003); Culfargie Estates (07693/1/001); The Petrie Family (09289/4/003); D Ironside (07693/8/002); Danvers Valentine (09289/1/002); R T Hutton Planning Consultant (09539/3/001 & 09539/5/001); Mr & Mrs O Ferry (00779/1/001); Dunan Estate (07693/3/001); The Church of Scotland General Trustees (09167/9/001); Carolyn Bell (09289/23/001); A & J Stephen (Builders) Ltd (03068/2/001); Jamie Sinclair (09289/21/001): The sites being promoted for development are in the landward area as they are not within a settlement boundary in the LDP. The strategy of the Plan is to direct most growth to the principal settlements in line with TAYplan policy 1 (S4_Doc_067). These sites would not therefore be allocated for housing in the LDP. There is however scope for appropriate landward area sites to come forward through LDP policy RD3 (S4_Doc_418) through the planning application process.

No modification is proposed to the Plan.

Retention of Boundaries for Settlements in the Loch Leven Catchment Area

Councillor Michael Barnacle (02633/1/065, 02633/1/067, 02633/1/069, 02633/1/070, 02633/1/071, 02633/1/073, 02633/1/074, 02633/1/075 & 02633/1/076); Robert Hogg (00282/1/001); Mr & Mrs Thomas Dall (00749/1/001): These representations relate to the following settlements: Balado Crossroads, Craigowmill, Easter Balgedie, Gairneybank, Gairneybridge/Fruix, Mawcarse, Middleton, Netherton and Upper Tillyrie. It is LDP policy

EP7: Drainage within the Loch Leven Catchment Area (S4_Doc_491) which considers the issue of drainage and which gives protection to this area not settlement boundaries. The emphasis of LDP policy EP7 is that of mitigating the impact of development to deliver an overall improvement in phosphorous levels rather imposing a heavy restriction on development which would reduce the opportunity for improvement. It is not therefore considered necessary to identify boundaries for all settlements within the catchment area.

No modification is proposed to the Plan.

Identification of a Range of Sites

Dunan Estate (07693/3/001); Carolyn Bell (09289/23/001); D Ironside (07693/8/001); Culfargie Estates (07693/1/002): The LDP does identify a range of site types, sizes and locations. It does not identify the smallest sites in any settlement, with or without a boundary, but instead allows for these to come forward and contribute to the housing land requirement as windfall sites.

No modification is proposed to the Plan.

Policy RD3: Housing in the Countryside Policy

Inchtute Community Council (00701/1/002): The 2009 Housing in the Countryside Policy, as amended, will be incorporated as Supplementary Guidance (Core_Doc_064) to the LDP.

No modification is proposed to the Plan.

Susan Fraser & Alison Ramsay (00390/1/004); The Braes of the Carse Conservation Group (00391/1/006): These representations only sought the identification of settlement boundaries should changes be made to LDP policy RD3 (S4_Doc_418) or the associated Supplementary Guidance (Core_Doc_064). The Council are not proposing any changes to policy RD3 and only minor changes were made to the Supplementary Guidance which further strengthen the policy.

No modification is proposed to the Plan but should the Reporter be minded to make amendments to Policy RD3 these requests for settlement boundaries will need to be borne in mind.

Non-Settlement Specific Comments

Kinross-shire Civic Trust (06950/1/010): The Kinross Area Local Plan policy 48 (S4_Doc_290) (and equivalents in other Local Plans) is no longer required. Removal of the Kinross Area Local Plan policy was linked to the removal of settlement boundaries for the smallest settlements – because a proposal is at the edge of a settlement does not automatically make it inappropriate. It could in fact be the best location for new development. Development in the countryside and adjacent to settlement boundaries will be controlled by LDP policy RD3 (S4_Doc_418) section 1 building groups and extensions onto definable sites. It is not therefore considered necessary to include further policy provision within the LDP.

No modification is proposed to the Plan.

Peter Allan (00327/4/001): The absence of a settlement boundary is an indication that the Council consider that development proposals can adequately and appropriately be assessed under LDP policy RD3 (S4_Doc_418) so a defined settlement boundary is not therefore required. It is not considered that the amendment to LPD paragraph 6.1.12

(S4_Doc_509) proposed in the representation adds any further clarity.

No modification is therefore proposed to the Plan.

Proposed Settlement Extensions – Clathy and Campmuir

John Buchan (09169/1/001); The Harris Family (10220/1/001): There are no boundaries identified for Clathy or Campmuir in the proposed LDP so these requests for boundary extensions are not applicable. Any proposals for development at Clathy or Campmuir would fall to be assessed against LDP policy RD3 (S4_Doc_418).

No modification is proposed to the Plan.

Additional Comments on Craigowmill

Kinross-shire Civic Trust (06950/1/012): It is LDP policy ER6: Managing Future Landscape Change to Conserve and Enhance the Diversity and Quality of the Area's Landscapes (S4_Doc_397) which gives protection to the landscape, not settlement boundaries. It is not therefore considered necessary to identify a boundary for Craigowmill solely because it is within the current Area of Great Landscape Value. All settlements are protected by Policy ER6.

No modification is proposed to the Plan.

Additional Comments on Easter Balgedie

Fiona Mead (00633/1/001); Mr & Mrs Alexander Lindsay (09899/1/001): Concerns are raised that the proposed removal of the settlement boundary will result in increased levels of development which will in turn have an adverse impact for those people already living there and those who may wish to visit. As stated in the overall response above LDP policy RD3 (S4_Doc_418), together with the supplementary guidance and other LDP policies, are considered to provide a detailed and comprehensive framework for determining planning applications. It is not envisaged therefore that there will be any greater impact on the landscape, the attractiveness of the area to tourists, or on existing businesses as a result of removing the settlement boundary.

No modification is proposed to the Plan.

Kinross-shire Civic Trust (06950/1/013): It is LDP policy ER6: Managing Future Landscape Change to Conserve and Enhance the Diversity and Quality of the Area's Landscapes (S4_Doc_397) which gives protection to the landscape, not settlement boundaries. It is not therefore considered necessary to identify a boundary for Easter Balgedie solely because it is within the current Area of Great Landscape Value.

No modification is proposed to the Plan.

Robert Hogg (00282/1/001); Mr & Mrs Richard Green (00858/1/001): The impact of any additional development on road safety would be assessed at planning application stage.

No modification is proposed to the Plan.

Portmoak Community Council (00638/2/003): Highlights that Easter Balgedie is unique within the Portmoak area as it contains three working farms but this if anything further emphasises the rural nature of the settlement which is best served by Policy RD3.

No modification is proposed to the Plan.

Fiona Mead (00633/1/001); Portmoak Community Council (00638/2/003); Mr & Mrs Alexander Lindsay (09899/1/001); Mr & Mrs Mark Dall (00748/1/001); Mr & Mrs Thomas Dall (00749/1/001): Draw comparison with the Scotlandwell/Kilmagadwood boundary. To clarify, this is a proposed tightening of the existing settlement boundary rather than the creation of a new boundary for Kilmagadwood. The gap between Scotlandwell and Kilmagadwood is small, separated by a single field, but the main reason for the boundary alteration here is to help preserve the setting of the conservation area of which the aforementioned field forms a part. Whilst the Council agrees it is important to avoid settlement coalescence the distances between Easter Balgedie and the neighbouring settlements of Wester Balgedie and Kinnesswood are much larger than that for Scotlandwell and Kilmagadwood.

No modification is proposed to the Plan.

Additional Comments on Pitnacree

Patrick Sheriff (09289/3/003): LDP policy PM1A (S4_Doc_396) is as applicable to proposals for development in settlements where there is no boundary as it is to settlements with an identified boundary. It is not therefore considered necessary to identify a boundary for Pitnacree on the grounds that it provides a sound basis for LDP policy PM1A.

No modification is proposed to the Plan.

Additional Comments on Tenandry

The Church of Scotland General Trustees (09167/9/001): National Scenic Areas are national designations designated under Section 263A of the Town and Country Planning (Scotland) Act 1997 (S4_Doc_637). The Council is not at liberty to exclude Tenandry from the National Scenic Area through the LDP process.

No modification is proposed to the Plan.

Reporter's conclusions:

1. Reference should also be made to Issue 8a, which considers Policy RD3, and Issue 14, which deals with the green belt.
2. Representations which request a settlement boundary where none is proposed may be categorised into two types: those which are prompted by concern that the absence of a settlement boundary will be too restrictive of new residential development in that location; and those which reflect concern that the absence of a settlement boundary will permit too much residential development through the application of Policy RD3 and the associated Housing in the Countryside supplementary guidance. Each argument is considered below.
3. However, it is necessary first to address the representation which seeks to strengthen the effect of settlement boundaries by introducing a policy similar to Policy 48 in the Kinrosshire Area Local Plan. This would have the effect of introducing a policy presumption against development beyond a settlement boundary.

The argument in favour of a presumption against expansion beyond a defined settlement boundary

4. Unlike Policy 48 in the Kinrosshire Area Local Plan and similar policies in other local

plans, the Proposed Plan contains no policy presumption against development beyond a settlement boundary. Any such proposal would be assessed under Policy RD3 in the same way as a proposal to extend a building group which did not have a settlement boundary. As currently drafted therefore, the definition of a settlement boundary has little effect in controlling the expansion of a settlement because development outwith the defined boundary could potentially be approved under Policy RD3. Consequently, while a settlement boundary might be of assistance in indicating where settlement expansion would be particularly welcome, it would have little effect in defining an edge to a settlement beyond which further development would not be expected to occur. This significantly undermines the usefulness of the settlement boundary designation.

5. The council's response to the request for a policy similar to Policy 48 in the Kinrosshire Area Local Plan argues that such an approach is no longer necessary because Policy RD3 would provide an adequate level of control. The council states that a site which was on the edge of a settlement (and presumably by this it means outwith the defined boundary) might be the best location for new development. But if that were the case, one would have to ask why the land in question was not included within the settlement boundary.

6. There seems little logic in drawing settlement boundaries if they have no effect in defining the edge of settlement and are only an indicator of where development might and might not be encouraged. It is recommended therefore that a new policy is included within the Proposed Plan, which sets out a presumption against development outwith a defined settlement boundary. This will provide much greater certainty for local residents and for prospective developers alike. An appropriate place for this would be in the "Placemaking" section, as a new Policy PM4.

7. Representations requesting a settlement boundary, which are considered below, are considered in the light of the presumption against development beyond that boundary, which such designation (with the above modification) will now convey.

The argument that the absence of a settlement boundary is too restrictive

8. The absence of a settlement boundary around a particular building group does not remove all residential development potential. All of the locations that have been put forward by those seeking greater development potential are outwith the green belt. Housing development in such locations is potentially supported under Policy RD3 and the accompanying Housing in the Countryside supplementary guidance, which defines the circumstances in which such development will be supported. The aims of Policy RD3 and the supplementary guidance are to promote housing opportunities in the countryside while protecting residential and visual amenity and landscape character. Although this policy and its accompanying guidance would not apply to sites within a defined settlement boundary, considerations such as residential and visual amenity and landscape character are likely to be equally important to the council's assessment of a proposal in such locations, in accordance with the requirements of Policies PM1A and ER6.

9. Ultimately therefore, defining a settlement boundary around a building group is only likely to increase opportunities for residential development where the boundary is drawn loosely enough to include within it, areas of developable land that are larger than might be permitted under Policy RD3. This is the approach the council has taken where it has identified a building group that it considers has the attributes necessary to be an appropriate location for encouraging development. In assessing the requests for a

settlement boundary to be defined in order to enhance development opportunities, an assessment has been made as to whether that location is suited to a higher level of development than one would expect to be permitted under Policy RD3.

10. The council has listed the factors that it took into account when deciding whether to define a settlement boundary. These include the range and type of facilities in the building group such as schools, shops or community facilities, and its overall size, settlement pattern and number of houses. These are all appropriate considerations. It is essential to bear in mind the expectation in TAYplan, with which the Proposed Plan must be consistent, that the majority of development is directed to the principal settlements and that only limited and properly justified opportunities for development are permitted elsewhere. Also of significance are the Key Objectives of the Proposed Plan, which include a commitment to producing a more efficient settlement pattern, which contributes to reducing the need to travel. It is difficult to see how encouraging housing development in locations that have few if any services or employment opportunities and poor public or active transport provision could be consistent with that objective.

11. Each of the locations where a settlement boundary has been requested in order to promote development has been considered against the above factors. In all cases, the building groups in question are small (and often dispersed) and offer few if any community facilities. In no case has a convincing argument been made to justify how expanding the residential development potential beyond that which would be permitted by Policy RD3 would accord with the objectives of TAYplan or the Proposed Plan itself. Consequently, none has been found to be appropriate for inclusion in the Proposed Plan as a settlement with a defined boundary.

12. It has been argued that the expansion of rural building groups would assist in meeting housing supply targets and in providing a range and choice of development sites. While this may be so, the examination of other issues, particularly Issues 20c and 20d, which deal with strategic housing issues, and the issues which deal with individual settlements within each housing market area, has found that the Proposed Plan provides a generous supply of effective housing land to meet the full range of housing requirements over the plan period and also to provide an immediate and on-going effective five year supply. Such sites are focussed on the principal settlements in order to be consistent with TAYplan, but provide development opportunities in a wide range of locations. Against that background, there can be no justification for defining additional inappropriate locations as settlements in order to provide improved prospects for residential development.

13. It has also been argued that there are settlements defined in the Proposed Plan, which are no larger, no less dispersed, or contain any greater range of local services than those which the council has not proposed. However, the role of this examination is not to compare one building group with another, but to consider each location on its merits. Where representations have been made against a settlement boundary that is included in the Proposed Plan, these have been examined under the relevant section of this report.

14. Ultimately, in respect of all of the settlements where a settlement boundary is proposed in order to promote development, it is concluded that the application of Policy RD3 and the accompanying supplementary guidance will provide an adequate framework for the consideration of development proposals and that there are no grounds for modifying the plan. There is no reason to suspect that this approach will fail to strike an appropriate balance between, on the one hand, satisfying the expectation in Scottish Planning Policy (SPP) to permit residential development in all rural areas, and on the

other, to encourage an efficient settlement pattern which contributes to reducing the need to travel.

The argument that the absence of a settlement boundary is not restrictive enough

15. With the recommended modification to incorporate a presumption against development beyond a settlement boundary, the significance of having a settlement boundary clearly increases. This has been taken into account when considering the requests for additional settlement boundaries in order to constrain development.

16. Representations have been received in respect of some rural building groups, which call for a settlement boundary to be defined in order more clearly and effectively to resist inappropriate levels of development. Some of this concern appears to be prompted by dissatisfaction with how successfully the council has controlled rural housing development in the past and some is prompted by concern that supplementary guidance might be modified at some point in the future in a manner which reduced its effectiveness. Both issues are addressed below before consideration is given to the appropriateness of defining settlement boundaries around building groups which do not currently have such a boundary.

17. In its response to representations made about Policy RD3 (which are examined under Issue 8a) the council has accepted that operation of the 2005 Housing in the Countryside Policy permitted, on occasion, some development that subsequently proved to be unpopular with rural communities due to its scale and character. As a result, the latest iteration of that policy, which will provide supplementary guidance to Policy RD3, is in some respects more cautious in its support for such proposals. It cannot reasonably be concluded therefore that any perceived shortcomings in the control of unsympathetic development that might have been experienced in the past, will necessarily continue under the revised approach.

18. With regard to concerns over subsequent relaxation of the housing in the countryside policy, Scottish Planning Policy (SPP) expects the detail of how policies will operate to be contained within supplementary guidance. Although such guidance is not subject to examination in the same way as policies that are set out in a proposed plan, it requires to be prepared in accordance with the Town and Country Planning (Development Planning) (Scotland) Regulations 2008, which sets out requirements for public engagement. Specifically, authorities must publicise draft supplementary guidance, giving a date before which representations may be made. Authorities must make people who may wish to comment aware of the guidance and give them an opportunity to comment. The authority must then consider any comments, and then send Scottish Ministers a copy of the guidance they wish to adopt. In addition, authorities must send Ministers a statement setting out the publicity measures they have undertaken, the comments they received, and an explanation of how these comments were taken into account. These requirements provide adequate opportunity for interested parties to comment upon any future supplementary guidance, which the council might propose.

19. The content of the proposed supplementary guidance has been taken into account in considering the representations raised under this Issue, as this is essential to understanding how Policy RD3 would operate.

20. Turning to the policy itself (to which minor modifications have been recommended under Issue 8a) and the accompanying supplementary guidance, these potentially permit residential development in a range of locations but contain a number of assessment

criteria and policy stipulations, which aim to permit only appropriate levels of new development in order to avoid harming local landscape character, the visual amenity of building groups and the living conditions of those who live there. There is no reason to suspect that this policy framework would prove ineffective in addressing these important issues.

21. None of the building groups that are referred to in the representations about this issue has the scale, form or range of facilities necessary to justify its identification as settlements defined by a settlement boundary. It would be inappropriate and illogical in the context of the plan's overall spatial strategy therefore, to identify them as settlements with a settlement boundary. Policy RD3 and its supplementary guidance would adequately control any additions to these building groups. Other plan policies aimed at protecting the character and amenity of the settlement and avoiding landscape harm would also apply, as would, where relevant, policies aimed at protecting conservation areas and other heritage assets.

22. Taking all matters into consideration, there are no grounds to provide any of the proposed locations with a settlement boundary.

Reporter's recommendations:

1. Add a new Policy PM4 worded as follows:

"Policy PM4 Settlement Boundaries

For settlements which are defined by a settlement boundary in the plan, development will not be permitted, except within the defined settlement boundary."