

Issue 46		Whole Plan Issues	
Development plan reference:	<p>1 – Introduction, page 13-16 2.2.1 - Vision Statement, page 17 2.4.2 – Sustainable Economic Growth Strategy, page 19 2.4.12 – Infrastructure Strategy, page 21 PM3 - Infrastructure Contributions, page 24 3.9 – The Natural Environment, page 40-46 3.10 – Environmental Resources, page 47-69 4.1.1 - Spatial Strategy, page 61 Perth Area Landward Map, page 73 5.2.5 – Perth Transport Infrastructure, page 76-77 Highland Perthshire Area Landward Map, page 155-156 Kinross Area Landward Map, page 201 Strathearn Area Landward Map, page 243 9.1.12 - Lunan Valley Lochs, page 274 Strathmore and the Glens Landward Map, page 277 H66 – Ardler, page 209 H69 - Forfar Road, Meigle, page 302 Glossary, page 306-309</p>		Reporter: David Buylla
	Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Scone &amp; District Community Council (00043) Scottish Water (00055) Portmoak Community Council (00638) Sainsbury's Supermarkets Ltd (00754) Universities Superannuation Scheme Ltd (00844) Scottish Environment Protection Agency (03194) Scottish Natural Heritage (05211) JW Farquharson and GD Strawson (09117)</p>		<p>Ken Russell (09193) SSE plc (09311) Shell UK Ltd (09313) David Adams (09420) Dr Peter Symon (09723) G S Brown Construction Ltd (09817) Alistair Godfrey (09941) BP North Sea Infrastructure (09994) Stewart Milne Homes (10080) Homes for Scotland (10214) Ken Miles (10236) John Munro (10277)</p>	
Provision of the development plan to which the issue relates:	General representations to the Plan		
Planning authority's summary of the representation(s):			
<p><u>Glossary</u> Scone &amp; District Community Council (00043/1/003): Term '<i>committed project</i>' should be defined in the glossary as it is loose and open to interpretation and possible abuse.</p> <p>Sainsbury's Supermarkets Ltd (00754/1/002): Wording suggested for a definition of 'retail sites' that should be included in the glossary.</p>			

Universities Superannuation Scheme Ltd (00844/1/015): Support glossary definition of Town Centre but reference to Local Plans should read Local Development Plans. Support glossary definition of Vitality and Viability. Glossary should contain definition of a commercial centre. Glossary definition of retail park should be amended as off-centre is not a term used in any current planning policy document.

Ken Russell (09193/8/001): Term mixed use is used in the LDP but requires a definition.

#### Supplementary Guidance

Portmoak Community Council (00638/2/002 & 00638/2/007): It is unacceptable that the Settlement Strategy Landscape Capacity Study (Core\_Doc\_053) is unavailable for comment and there is no supplementary guidance on landscape to replace the current provisions of Areas of Great Landscape Value. This failure makes commenting on this part of the LDP impossible.

G S Brown Construction Ltd (09817/3/008): The Developer Contributions supplementary guidance is not available and this makes commenting difficult. We have no idea what the level of contributions will be.

Stewart Milne Homes (10080/10/001): There is insufficient detail in the LDP policies to enable determination of applications under Section 25 without supplementary guidance and/or planning advice notes. Council have not published supplementary guidance. The Plan does not therefore constitute an LDP for the purposes of the 1997 Act (Core\_Doc\_120) and does not comprise a document in respect of which there could be a lawful examination in accordance with Section 19 and 19A, or which could be adopted lawfully in accordance with Section 20(1) (S4\_Doc\_602).

Homes for Scotland (10214/1/040): Any supplementary guidance currently available or in the process of being created, which relates to infrastructure contributions should be listed here. It is not possible for developers or landowners to accurately calculate the contributions that are required without this information. Cannot tell if allocated sites will be effective and currently have no way of determining this.

#### Format

Alistair Godfrey (09941/1/007): Considers that the present position of referencing transport infrastructure in a separate document called 'Shaping Perth's Transport Future' Shaping Perth's Transport Future (Core\_Doc\_021) is contrary to SPP paragraph 14 (S4\_Doc\_311) and do not consider this issue to be overcome by the cross referencing from the Proposed Local Development Plan.

Homes for Scotland (10214/1/005): Scottish Ministers expect LDPs to be concise, map-based documents. The LDP is not concise, contains repetition and is not user-friendly due to the fragmented layout.

Homes for Scotland (10214/1/006): The Vision and Objectives – SPP (Core\_Doc\_048) does not require Perth & Kinross Council's LDP to have a separate vision statement because it is within an SDP area but if Perth & Kinross Council wants one it should stand out as it is presently lost in paragraph 2.2.1.

Ken Miles (10236/1/001): Identification of opportunity sites for employment at Stirling Road and Kinross Auction Mart are omitted from table at 7.1.6. Plan should clearly state Stirling Road Op16 and Kinross Auction Mart Op13 or there could be confusion with Stirling Road E19 in particular.

John Munro (10277/1/001): There should be a generalised '*urban structure*' plan making clear how proposals and policies relate to national and local aims and to strategies for health, education, transport etc. This would not include details needed in the statutory Plan and would cover a longer period (refer to 'Inverness Vision' by Highland Council 15 years ago).

### Maps

Scottish Natural Heritage (05211/6/001): Welcome the identification of the Lunan Valley catchment area and Loch Leven catchment area on the LDP maps. Also recommend the River Tay SAC catchment is shown on these maps. Making potential developers aware of this catchment is an effective way of drawing attention to possible requirements for developments within the River Tay SAC catchment. SPP paragraph 139 (S4\_Doc\_085)

SSE plc (09311/1/011): For purposes of the LDP strategy, certain localised distribution network enhancements likely to be required to increase capacity to meet the envisaged housing and business growth numbers in the LDP.

NPF2 National Development 11 not recognised in the LDP.

Shell UK Ltd (09313/3/002): Consultation zones should be clearly shown on all relevant settlement maps to ensure Health and Safety Executive are consulted on proposals for development and compliance with Planning Advice for Developments near Hazardous Installations (PADHI) guidelines

Shell UK Ltd (09313/3/005); BP North Sea Infrastructure (09994/9/001): Southernmost part of site may encroach on pipeline consultation zone, so this should be highlighted to potential developers

Dr Peter Symon (09723/2/001): Site specific presentation of the area-based part of the LDP (refer paragraph 4.1.1) is a serious weakness. Sites already under construction or with consent are not identified as proposals. Only presenting proposed sites making it difficult to consider cumulative impacts on the need for additional infrastructure or facilities.

Sites identified are almost all housing sites. Inappropriate to consider most other developments as minor windfall when some are classed as major developments in terms of Development Management. Such sites do not appear at all in the LDP (refer example of Outdoor Experience Centre at Inchoonans) and this is a serious failing of the LDP as a comprehensive spatial planning policy framework.

BP North Sea Infrastructure (09994/10/001): Support the retention of the pipeline corridors in the spatial strategy maps.

Scottish Natural Heritage (05211/6/002): Suggest that the location of both statutory and non-statutory local designations are identified in the LDP. We recommend their inclusion on the landward maps in the Plan. Local designations, such as Local Nature Reserves, are a statutory designation and should be identified clearly in the Plan. Making potential developers aware of the location of these sites on maps in the plan is an effective way of drawing attention to the policy approach and level of protection. Refer to paragraph 139 of SPP (S4\_Doc\_085).

Alistair Godfrey (09941/1/009): Should fully reflect SPP paragraph 126 (S4\_Doc\_079). The same applies also to Policy NE1, and Perth & Kinross Council should be clear about

local designations in its policy and to take account of paragraph 139 of SPP to identify such areas in the plan. In the absence of its own designations, Perth & Kinross Council should take account of initiatives led by organizations providing local knowledge of the importance of geological and ecological sites.

#### Clarity

Scottish Natural Heritage (05211/15/003): Amend wording of paragraph 6.1.15 to clarify the settlements within the catchment area.

J W Farquharson & G D Strawson (09117/4/001): Existing diagram at paragraph 2.4.2 is indecipherable.

#### Process

David Adams (09420/1/002): TAYplan should have reported first so that the overall strategy and scale of development for various settlements would have been established.

#### Support

Scottish Water (00055/1/001): Support for the Plan

Scottish Environment Protection Agency (03194/20/001): Welcomes the identification of waste management sites and infrastructure in the LDP.

### **Modifications sought by those submitting representations:**

#### Glossary

Scone & District Community Council (00043/1/003): Term '*committed project*' should be defined in the glossary.

Sainsbury's Supermarkets Ltd (00754/1/002): A definition of 'retail sites' should be included in the glossary - suggested wording: '*Sites which benefit from planning permission which make a contribution to the network of centres*'.

Universities Superannuation Scheme Ltd (00844/1/015): Glossary definition of Town Centre should refer to Local Development Plans not Local Plans.

Glossary should contain a definition of '*Commercial Centre*' suggest following wording:

*'These are distinct from town centres as their range of uses and physical structure makes them different in character and sense of place. They generally have a more specific focus on retailing or on retailing and leisure uses. Examples of commercial centres include out-of-centre shopping centres, commercial leisure developments, mixed retail and leisure developments, retail parks and factory outlet centres'.*

Glossary definition of retail park should be amended as follows: '*An out-of-centre group of three or more stores selling primarily non-food goods, with a shared car park*'.

Ken Russell (09193/8/001): Term mixed use should be defined in the glossary e.g. '*A site where a variety of developments may be established, particularly those not catered for elsewhere in the plan e.g. Use Classes 10 & 11*'.

#### Supplementary Guidance

Portmoak Community Council (00638/2/002): The Settlement Strategy Landscape Capacity Study (Core\_Doc\_053) should be made available for comment.

Portmoak Community Council (00638/2/007): No specific modification sought but implied that the supplementary guidance on landscape should be available for comment alongside the LDP.

G S Brown Construction Ltd (09817/3/008): The level of contributions should be set out in the policy.

Stewart Milne Homes (10080/10/001): LDP should contain policies and proposals which provide details of the development which is proposed by the Council for identified land and which is sufficient to comply with the requirements of the 1997 Act (Core\_Doc\_120).

Homes for Scotland (10214/1/040): The policy should contain further information listing the Supplementary Guidance to be read in conjunction with this policy. The Supplementary Guidance relating to this policy should be available.

#### Format

Alistair Godfrey (09941/1/007): The inclusion of land and infrastructure within the Plan itself.

Homes for Scotland (10214/1/005): Repetition of the requirements for each area should be removed from the introductions to chapters 4-9 e.g. all the housing numbers and education infrastructure requirements should be combined and included in chapter 4.

Homes for Scotland (10214/1/006): The statement in paragraph 2.2.1 (last sentence) '*Our vision is of a Perth and Kinross which is dynamic, attractive and effective which protects its assets whilst welcoming population and economic growth*' should be typed to stand out from the rest of the text, so that the reader can see the vision statement easily.

Ken Miles (10236/1/001): Table at 7.1.6 should clearly state Stirling Road Op16 and Kinross Auction Mart Op13.

John Munro (10277/1/001): There should be a generalised '*urban structure*' plan making clear how proposals and policies relation to national and local aims and to strategies for health, education, transport etc. This would not include details needed in the statutory Plan and would cover a longer period.

#### Maps

Scottish Natural Heritage (05211/6/001): Identify the River Tay SAC catchment boundary on the LDP maps.

SSE plc (09311/1/011): Proposals maps should illustrate alignment of the existing 275kV transmission line and the text amended to recognise the 400kV upgrade.

Shell UK Ltd (09313/3/002): Definition of pipeline consultation zone on map of Ardler

Shell UK Ltd (09313/3/005); BP North Sea Infrastructure (09994/9/001): Inclusion of pipeline consultation zone on the proposals map at H69, and inclusion of a requirement for consultation with HSE under developer requirements in paragraph 9.14.3.

Dr Peter Symon (09723/2/001): LDP should identify sites already under construction or with consent as well as proposals. LDP should identify sites for all land uses not just mainly housing sites. Such other uses should not be considered as '*minor windfall*' developments.

Scottish Natural Heritage (05211/6/002); Alistair Godfrey (09941/1/009): Regarding Policy NE1C the location of both statutory and non-statutory local designations should be identified in the LDP, such as the Inner Tay Estuary Local Nature Reserve. We recommend their inclusion on the proposals maps.

#### Clarity

Scottish Natural Heritage (05211/15/003): Amend wording of paragraph 6.1.15 to include:

*'The settlements that lie within the Lunan Lochs catchment are Butterstone, Concraigie, Craigie, Kinloch and the west of Blairgowrie'.*

J W Farquharson & G D Strawson (09117/4/001): Need for a clearer diagram at paragraph 2.4.2

#### Process

David Adams (09420/1/002): No modification is proposed to the Plan.

### **Summary of responses (including reasons) by planning authority:**

#### Glossary

Scone & District Community Council (00043/1/003): The term '*committed project*' is the point where a project is included in the capital programme of the relevant agency and funding is secured. The Council do not regard a definition as essential to understanding the Plan.

No modification is proposed to the Plan. However, if the Reporter is so minded as to include a definition within the Glossary then the Council would have no objection.

Sainsbury's Supermarkets Ltd (00754/1/002): The Council does not consider it is necessary to include a definition of '*Retail Sites*' in the Glossary as it is not a phrase which occurs in the Plan.

No modification is proposed to the Plan. However, if the Reporter is so minded as to include a definition within the Glossary then the Council would have no objection.

Universities Superannuation Scheme Ltd (00844/1/015): The Council does not consider it is necessary to include a definition of '*Commercial Centres*' in the Glossary as paragraph 54 in SPP (Core\_Doc\_048) provides a definition and it would be repetitive to put it in the Plan also.

No modification is proposed to the Plan.

Should the Reporter be so minded the Council have no objection to the wording in the Glossary for 'Retail Park' being amended to read '*out-of-centre*' rather than '*off-centre*'.

Ken Russell (09193/8/001): Policy ED1B (S4\_Doc\_483) has been designed to allow maximum flexibility providing the proposed uses are compatible with surrounding land uses and the setting of a tight definition may impede this. The term '*mixed use*' can describe a variety of development projects and the mix of uses will vary from proposal to proposal. It is therefore imprecise to define, however, the supplementary guidance for policy ED1 would be the appropriate place if a definition is necessary.

No modification is proposed to the Plan.

Supplementary Guidance

Portmoak Community Council (00638/2/002): The Settlement Strategy Landscape Capacity Study (Core\_Doc\_053) was completed in 2005 by David Tyldesley and Associates for the Council in relation to the Kinross Area Local Plan (Core\_Doc\_008). It is a background document used to inform plan preparation; it is not a report for consultation. It has not formed part of the published documents for establishing this Plan. However the Community Council are aware of the document and could have requested to view the published document which has been available for public inspection at the Council offices since its publication. It is acknowledged that due to its format it is not possible to be viewed online.

No modification is proposed to the Plan.

Portmoak Community Council (00638/2/007): As identified in the Plan supplementary guidance relating to landscape is to be prepared. It was considered by the Council that given the likely scope, scale and detail involved in identifying such areas, and also to ensure their protection and enhancement through the development management processes, that the issue would be best dealt with through supplementary guidance to the Plan. Unfortunately, there were insufficient resources available to produce the guidance and the necessary environmental assessments and other studies required to inform and accompany the document in advance of the publication of the Proposed Plan. It is however a priority for the Council during 2013 to produce and consult on supplementary guidance linked to Policy ER6 (S4\_Doc\_397) of the Plan. Draft LDP Action Programme 2012-2024, page 14 (Core\_Doc\_172).

No modification is proposed to the Plan.

G S Brown Construction Ltd (09817/3/008): By setting out the level of contribution in the policy itself this would remove any flexibility in the policy to revise the amount in response to changing economic conditions and therefore be detrimental to developers. It's considered the most appropriate approach is that taken where the Supplementary Guidance details the level of contributions and how they are calculated; this document will have been subject to consultation prior to approval by the Council and as such will take into account comments from developers and others. The document will be able to be revised and updated as necessary. Reference to Schedule 4, 04 (Infrastructure Contributions) the Council's response under the topic heading 'Policy PM3 Infrastructure Contributions' is highlighted for further information on this issue.

No modification is proposed to the Plan.

Stewart Milne Homes (10080/10/001): The Council considers that the Plan complies with the requirements of the Town & Country Planning (Scotland) Act 1997 (as amended) (Core\_Doc\_120); that it is a spatial strategy for the Perth & Kinross area, and is a detailed statement of the policies and proposals as to the development and use of land. The matter of supplementary guidance is dealt with as per section 22(1) of the Act (S4\_Doc\_602).

The Council has already published 22 pieces of supplementary guidance. A recent committee paper shows 6 other supplementary guidance priorities which are likely to be finalised alongside publication of the Plan. It is highlighted a similar representation was made to the Aberdeenshire LDP and was considered by the Reporter who found no issue.

No modification is proposed to the Plan.

Homes for Scotland (10214/1/040): The supplementary guidance relating to Infrastructure Contributions had not been published for consultation at the time of the Proposed LDP period of representation. The supplementary guidance has since been approved by Council for consultation and has been out for consultation in December 2012. Cross reference with Schedule 4, 04 (Infrastructure Contributions) is highlighted for a more detailed response on the issue.

No modification is proposed to the Plan.

#### Format

Alistair Godfrey (09941/1/007): Legislation and national policy require the Plan to be a succinct document focusing on the main proposals. Therefore it is not considered possible to merge the separate document regarding transport infrastructure into the Plan as it contains too much detail and should be fully considered on its own; appropriate reference is made to transport infrastructure where necessary in the Plan and Transport Planning have been involved throughout the preparation of the Plan. It is highlighted that key transport proposals with land use consequences are detailed in the Plan i.e. CTRL, Park + Ride sites.

No modification is proposed to the Plan.

Homes for Scotland (10214/1/005): The Council does not agree with the representation proposing the removal of the requirements for each area. Many members of the public using the Plan will only look at the areas they are interested in and its therefore felt to be 'user friendly' that the requirements should be highlighted for each area in the introductions to chapters 4-9. Whilst there are common themes there are some differences between the areas.

The Council has reduced 5 Local Plans into the Plan and believes this to be a concise document which is aided by the map based approach used, which has been recognised by the Scottish Government as good practice.

No modification is proposed to the Plan.

Homes for Scotland (10214/1/006): The Council does not consider the additional highlighting of the vision in the last sentence of paragraph 2.2.1 is required.

No modification is proposed to the Plan. However, if the Reporter is so minded then the Council would have no objection to the proposed modification.

Ken Miles (10236/1/001): By their nature the sites Op13 and Op16 are opportunity sites rather than employment sites and therefore not included in the table at paragraph 7.1.6 (S4\_Doc\_499) which relates specifically to employment sites in the Kinross-shire area. Op13 and Op16 are clearly identified with the Site Specific Developer Requirements on pages 207-208 and it is not considered necessary to alter this and include the modification as proposed.

No modification is proposed to the Plan.

John Munro (10277/1/001): The LDP is not considered to be an appropriate document to cover the '*urban structure*' plan that is referred to. It would alter the aim and structure of



the Plan particularly giving it a life extending beyond the SDP period and this is considered inappropriate and not in line with Scottish Government guidance.

No modification is proposed to the Plan.

#### Maps

Scottish Natural Heritage (05211/6/001): Each of the strategy sections, or specific proposals, provides sufficient cover and highlights the area so the Council does not consider the identification of the River Tay SAC catchment boundary on the Plan maps would be particularly meaningful given that it covers a significant part of the Perth and Kinross Council area.

No modification is proposed to the Plan.

SSE plc (09311/1/011): The Council does not agree that the proposals map needs to illustrate the alignment of the existing 275kV transmission line as this is available on Ordnance Survey mapping. Nor does the Council consider that the text need be amended to recognise the 400kV upgrade as there are no land use implications if it is an upgrade to existing infrastructure.

No modification is proposed to the Plan.

Shell UK Ltd (09313/3/002): The pipeline consultation zone is shown on the bottom right of the settlement map of Ardlar (page 291) and therefore the Council does not consider it necessary to add further to this.

No modification is proposed to the Plan.

Shell UK Ltd (09313/3/005); BP North Sea Infrastructure (09994/9/001): The pipeline consultation zone is shown on the bottom right of the settlement map of Meikle (page 302) in the Plan. It does not go through site H69 but is south of the site, therefore the Council does not consider it necessary to add the inclusion of a requirement for consultation with HSE under the Site Specific Developer Requirements.

No modification is proposed to the Plan.

Dr Peter Symon (09723/2/001): It is impractical to identify all current planning permissions, both active and unimplemented as some will be for relatively small sites and others may be nearing completion. Furthermore the value of identifying such developments is questioned as the opportunity for members of the public to have an input to the development of these sites has passed. The Plan has however sought to identify with a housing symbol larger sites with consent which have not commenced. The Plan identifies sites for the majority of land uses but it is highlighted that due to the high level of housing need and demand in Perth and Kinross housing sites do make up the majority of new proposals.

No modification is proposed to the Plan.

Scottish Natural Heritage (05211/6/002); Alistair Godfrey (09941/1/009): It is not considered necessary to identify the location of both statutory and non-statutory local designations on the landward maps of the Plan. This information is already publicly available from other sources. Reference to schedule 4, 15d (Policy ER6 (S4\_Doc\_397)) and the response to Sport Scotland (03185/1/006) is highlighted for further information.

No modification is proposed to the Plan.

#### Clarity

Scottish Natural Heritage (05211/15/003): Paragraph 6.1.15 relates only to the Highland HMA and the settlements within this area and the Loch Lunan catchment area and is therefore correct.

While the Council does not consider the proposed amendment to be appropriate in this paragraph the other settlements could be listed within the Strathmore and the Glens HMA paragraph 9.1.12 if the Reporter was so minded, and the Council would have no objection.

J W Farquharson & G D Strawson (09117/4/001): The diagram at paragraph 2.4.2 is considered to be both clear and helpful in setting out the key components of sustainable economic growth.

No modification is proposed to the Plan.

### **Reporter's conclusions:**

#### Glossary

1. The term "committed project" is not a technical term and is sufficiently clear not to require definition in the glossary.
2. Similarly, the term "retail sites" is self-explanatory. The term is not used in the plan in any technical sense and the proposed definition would give out of centre retail sites a status in the retail centres hierarchy which they are not afforded in Scottish Planning Policy (SPP) or in the policies of the Proposed Plan.
3. As reference to "local plans" in the definition of "town centre" is directed to future plans rather than to historic documents, it should be modified to "local development plans" to reflect current terminology.
4. For ease of reference, it would be helpful to include a definition of "commercial centre" with the glossary. That suggested in the representation reflects the definition in SPP and would be appropriate. The definition for "retail park" should be modified to refer to "out of town centre" rather than "off centre" to reflect recognised terminology. Simply defining such parks as "out of centre" would not be appropriate as some retail parks are in fact designated "commercial centres".
5. The term "mixed-use" is sufficiently clear not to require definition in the glossary and any attempt to define it would be likely to suggest erroneously that the range and composition of uses in a mixed use site is inevitably subject to restriction.

#### Supplementary Guidance

6. A number of representors are dissatisfied that specific detail on the implementation of certain policies in the Proposed Plan is not set out in the policy itself but is left for supplementary guidance to define. While such concerns are understandable, especially when the supplementary guidance in question may not yet have been produced, this practice is in accordance with the legislation. Opportunities for engagement in the preparation of supplementary guidance have been and will be made available.

Format

7. There is a degree of repetition within the Proposed Plan due to it being subdivided into four geographical areas. However, the benefits this brings to plan users who are only concerned with one of those geographical areas outweigh the increased size of the plan as a whole. The Plan's content, structure and timescale follow the government's expectations and the requirements of legislation. Transport infrastructure issues are sufficiently well recognised in the plan and it would be inappropriate to import the contents of other documents such as "Shaping Perth's Transport Future". There is no need for the vision expressed in paragraph 2.2.1 to be highlighted, as it is sufficiently clear at present and, in its current format is appropriately subordinate to the TAYplan vision, which is set out at paragraph 2.1.2, with which the proposed plan must be consistent.

8. Although some of the proposed opportunity sites are almost certain, when developed, to create additional employment space, the council's decision not to include them in tables that set out employment land designations is reasonable and does not lead to any confusion.

Maps

9. The landward maps are not a substitute for due diligence investigations by prospective developers and are not the only (or indeed the primary) source of information on which the council would rely when determining who to consult on receipt of a planning application. Therefore there is no need for them to contain every potential development constraint. And to do so would be likely to hinder their legibility. There is however a need to add to the maps, local landscape and natural heritage designations, which SPP requires to be clearly identified and protected through the development plan. Policy NE1C provides the required protection but does not identify spatially where these are located. Their addition to the maps should not compromise legibility or impose an unjustified administrative burden.

10. There would be no benefit in setting out in the maps all sites that have unimplemented planning permission, as these are no longer matters that are before the council for determination or about which interested parties may make representations. Their exclusion from the proposed plan does not prevent full account of their existence being taken when considering issues such as cumulative impacts. It is not the case that the council has resolved only to allocate land for residential development, leaving other potential uses to be developed on "white land". Where there is a need for a specific form of development, for example employment land, that is of a reasonably significant scale, a site is proposed within the plan. And the fact that other, smaller proposals, which are known to be in the pipeline, are not allocated in the plan, does not prevent them coming forward if they are consistent with the plan's strategy and policies.

11. National Development 11 in the National Planning Framework (NPF 2) is the large-scale reinforcement of the electricity grid. Within the Plan area there will be sub-stations and other infrastructure to be developed as part of this project, to which the Plan makes no specific reference. Although the project as a whole is undoubtedly of national significance, there is no evidence that its implications for this plan are so significant as to require specific reference.

Clarity

12. It would assist the Proposed Plan's clarity if the settlements within the Strathmore and the Glens area which lie within the Lunan Valley Lochs catchment area were listed at paragraph 9.1.12.

13. The diagram at paragraph 2.4.2 is adequately clear for its intended purpose.

Process

14. TAYplan has now been adopted and is a very significant material consideration in the examination of the Proposed Plan.

**Reporter's recommendations:**Glossary

1. Modify the definition of "Town centre" to refer to "local development plans" rather than "local plans".

2. Add a definition for the term "Commercial centre" to the glossary to read as follows:

*"These are distinct from town centres as their range of uses and physical structure makes them different in character and sense of place. They generally have a more specific focus on retailing or on retailing and leisure uses. Examples of commercial centres include out-of-centre shopping centres, commercial leisure developments, mixed retail and leisure developments, retail parks and factory outlet centres."*

3. Modify the definition of "Retail park" to refer to "out of town centre" rather than "off centre".

Maps

4. Add to the landward maps for each of the Plan's sub-areas, the location and extent of locally designated areas that are protected by Policy NE1C.

Clarity

5. Modify paragraph 9.1.12 to highlight the settlements within the Lunan Valley Lochs catchment area by adding an additional sentence at the end to read as follows:

*"The settlements that lie within the Lunan Valley Lochs catchment are Butterstone, Concraigie, Craigie, Kinloch and the west of Blairgowrie."*