

MIR Summary of Responses to Questions

Question 1:

Do you agree that the vision and objectives set out in the adopted Plan remain valid?

Yes/No

Please briefly tell us the reasons why

KEY AGENCIES

Scottish Water is delighted to support the vision and objectives set out within the adopted Plan by Perth and Kinross Council.

SNH suggest the Vision reflects the contribution of Perth and Kinross's considerable natural assets in improving quality of place, health and well-being.

TACTRAN, Scotia Gas Networks agree that the vision and objectives set out in the adopted Plan remain valid.

HES consider that the vision and objectives remain valid and welcome the continued commitment to the protection and enhancement of the cultural and historic environment.

Scottish Government – Would like to see Figure 2: Adopted Local Development Plan Key Objectives amended to include additional text to demonstrate upfront commitment to a town centres first approach – it may be most appropriate to include this within the 'Place' objective/section.

SEPA recommend that the vision and/ or liveable objectives are expanded to include the commitment that development will create high quality environments which contribute to health and wellbeing. In addition they recommend that a clear commitment is included within the vision and objectives to the protection and enhancement of the natural environment.

SUPPORT

The majority view was that the vision and objectives set out in the adopted Plan remain valid and in accordance with the strategic framework provided by TAYplan. Some additional comments of support were caveated with comments as follows:

- opportunities to allocate housing and employment together should be supported
- need to ensure that allocated housing sites are effective and deliverable
- the second paragraph of the housing objective, should read: 'ensure a continuous and effective seven year supply of developable housing land'
- the last objective under Place" should be amended to read "Protect and enhance the character, diversity and special qualities of the area's landscapes to ensure that new development does not exceed the capacity of the landscape in which it lies or existing infrastructure that it is dependent on"
- it would be appropriate for the 'Key Objectives' 'Climate', 'Infrastructure' and 'Economy' to be aligned in the context of how the development of appropriately sited renewable energy development could contribute equally to all three 'Key Objectives'

OPPOSITION

A number of the respondents whilst answering no to the question, actually support the objectives but disagree with the spatial strategy recommended to achieve them. Comments refer to:

- the Perth Core Area not necessarily being the most appropriate location for the majority of new development
- the tiering hierarchy being incorrect, with a suggestion that Auchterarder should be Tier 2
- need to ensure the housing land supply accommodates the needs of various sectors of the market. This requires the allocation of sites in smaller settlements which perform an important function in the wider area
- In interpreting the TAYplan Spatial Strategy, the Council is not delivering on the housing objectives. Expansion of other settlements out with those tiered should be considered
- there are some areas where more thought needs to be given to proposals for high density housing in areas that cannot sustain such growth
- greater emphasis needs to be put on housing delivery

Others who didn't support commented that:

- The vision and objectives in the MIR and LDP have been based on poor findings and without proper consultation and local knowledge
- housing allocation already surpassed, only landowners and developers benefit
- Objectives invalid for Longforan as proposing loss of agricultural land
- Lack of infrastructure to support development
- There should be more of a focus on prioritising the development of brownfield land ahead of greenfield, regardless of whether it is or isn't located within the Perth HMA
- No as there is not yet a clear lead on the problem of funding the Cross Tay Link Road, and disagree with the plans for meeting the housing need over the foreseeable future, in particular the pressing need for affordable housing The LDP's vision statement (2.2.1) is bland, verbose, uninspiring, non-quantifiable and certainly not memorable.

COUNCIL RESPONSE

The majority of respondents agreed in the main with the objectives. A number seemed to be looking for more detail to be added in relation to their particular areas of interest, however, there has to be a balance between how much information is contained in the objectives and what is more appropriately detailed within the policy framework. As the format of the Plan has changed the objectives are now split across the 4 policy sections, however, they remain relatively unchanged. A number of the comments relate to the spatial strategy set out to achieve the objectives. This is set by TAYplan and the LDP must conform.

Question 2:

Do you agree settlement based 'statements of aspiration' should be developed in conjunction with the communities and key stakeholders? Yes/No
Please briefly tell us the reasons why

KEY AGENCIES

Scottish Water agrees and would welcome the opportunity to be involved in the preparation of statements of aspiration.

SNH agree with the proposed 'statements of aspiration' for settlements as this will enable a long term direction for these areas and help establish their role and community aspirations. It is important to identify the actual and planned strategic assets for settlements and their wider connections as part of this, including locations of green infrastructure. We would be pleased to help with this process. We support the alignment with the Community Planning agenda.

TACTRAN confirms its willingness to engage with and support work on developing 'statements of aspiration' for settlements both in terms of linkage with the RTS and also in their role as a statutory Community Planning Partner.

Historic Environment Scotland considers that people associate positively with the historic environment features that help make up their neighbourhood and create attractive places to live and work. We therefore consider that communities have a strong role to play in influencing the future of their local areas and would emphasise the key role that the historic environment can play in helping deliver the aspirations of the community.

SEPA recommend that any statements of aspiration which are developed are informed by, and incorporate the relevant environmental constraints, such as flood risk, AQMAs and relevant sewerage issues which require investment from Scottish Water, and identify opportunities to provide environmental improvements such as enhanced green infrastructure, riparian habitats and active travel routes.

SUPPORT

Network Rail - Community engagement and development is key to delivering sustainable new communities.

Sportscotland considers that this approach would be a good opportunity to ensure the Local Development Plan is a spatial expression of what the Council seeks to achieve. All parts of the Council, and the Community Planning Partnership, should be involved at an early stage to think about challenges / vision for the area and how the development plan can deliver this. Such an approach could give emphasis to wider community issues – beyond housing and employment land – including community facilities, open space and sports facilities. The recently launched 'Place Standard', has the potential to assist in this area.

Homes for Scotland would urge early engagement with them and members

The majority view was that Statements of aspiration should be developed with communities and key stakeholders with full communication among all parties. Other comments of support were caveated with comments as follows:

- Statements of aspiration should be developed with communities and key stakeholders with full communication among all parties
- Yes, a community masterplan approach for Kinross/Milnathort is long overdue
- Would like to get involved in a village planning exercise for Errol
- Laudable but current aspiration for Blairgowrie is wrong
- Agree but they should not be seen as a blueprint - charrette in Crieff flawed as didn't take account of existing community engagement exercises and many conclusions and proposals had not secured community support
- It is essential that these "statements of aspiration" are followed through and actioned such that an agreed set of local rules or detailed policies is put in place

- Yes - However, nothing has happened with the community since the last plan was suggested and Longforgan deemed unsuitable. 350 local residents signed a petition to publish a masterplan after the previous consultation. This has been ignored
- Need to consider impact on nearby settlements
- Should be developed primarily with communities with less input from stakeholders
Development/house building industry needs to be more involved and consulted at an early stage
- It may be that they can be prepared outwith the LDP process as Supplementary Guidance
- Should also prepare them for smaller settlements
- If not affecting LDP timescales
- Early engagement is essential

OPPOSITION

The points raised by those who disagreed can be summarised as follows:

- They won't influence decisions and are a waste of resources
- Lack of resources so should be incorporated into the body of the plan
- Communities are not always consulted/aware
- The LDP should form the sole basis for defining settlement proposals and development intentions. To introduce a further set of documents with no additional powers in terms of ensuring deliverability will simply serve to confuse an already fairly complex system in terms of public perception as well as raising community expectations
- Whilst it is important to ensure that planned growth is supported by the identification of all issues which help deliver successful and sustainable places, we do not consider that statements of aspiration are required to ensure this

COUNCIL RESPONSE

The majority view was that statements of aspiration should be developed in conjunction with the communities and key stakeholders. Unfortunately due to a lack of resources and the differing timescales in preparation of the community planning agenda, it has not been possible to bring this forward in preparing LDP2. As the Community Planning Action Partnerships become more established it should be possible to pick up on this for a future LDP.

Question 3:

Do you agree with the preferred option of increasing the contribution of small sites in the Highland HMA from 15% to 20%?

Yes/No

Please briefly tell us the reasons why

KEY AGENCIES

SNH agree that larger scale sites in the Highland HMA can be more constrained by natural heritage considerations, and support a greater percentage of small scale sites making up the housing land requirement.

SUPPORT

Scotia Gas Networks agree in order to meet Council's housing needs.

Further support for the preferred option came from landowners, individuals and one Community Council.

Small scale development is seen as being the established pattern in Highland Perthshire; the nature of this area makes it harder to identify large sites for housing without detracting from the beauty and attractiveness of the natural and built environment. Small scale development is in keeping with national planning policy, in particular the need to encourage small scale development where constraints can be mitigated and where there is a clear economic benefit. Small sites have the potential to deliver a variety of benefits including: employment opportunities; affordable housing; helping sustain and rejuvenate communities; and helping meet housing needs. They provide greater diversity, are more sympathetic to the built and natural environment, are more easily absorbed into existing communities, and are more likely to be delivered.

However, meeting the housing land requirement necessitates a loosening of tight settlement boundaries and a more flexible approach to development at the edge of existing settlements and communities to avoid the risk that relying too heavily on small sites will promote unsustainable development. The emerging LDP therefore needs a policy context that will allow appropriate development opportunities within existing settlements to come forward. Development needs to be supported by the necessary infrastructure.

One respondent suggested that 20% is too low given the significant contribution from small sites in the past and the lack of delivery of larger allocated sites. This supports a more flexible approach to housing building in the Highland HMA to encourage more small sites in more sustainable locations.

OPPOSITION

Homes for Scotland disagree with the preferred option and are concerned at a potential over reliance on smaller sites. This will exacerbate the existing problem of a lack of main stream family housing; only by allocating more sites will the current under supply be readdressed. Historically some allocated sites haven't delivered due to infrastructure constraints but these, mainly technical issues, have now been removed.

Further objection to the preferred option came from a mix of landowners, individuals and housebuilders.

The increase would place an over-reliance on small sites, create uncertainty and dilute the purpose of allocating sites in the Development Plan. Infrastructure constraints which have impacted on the delivery of allocated sites have now been removed. This rate has not previously been achieved and in the longer term may exacerbate shortfalls in meeting the Housing Land Requirement. It increases the risk that the Council may not meet its duty to maintain an effective five year supply of land for housing as required by Scottish Planning Policy. SPP requires a generous supply of appropriate and effective sites to give the flexibility necessary for the continued delivery of new housing. The current level should remain and sufficient land should be allocated to meet the housing land requirement.

Concerns were expressed at the potential adverse impact on existing settlements: building houses on greenfield land 'bolted onto' small villages is not sustainable or logical; the associated impact on

existing infrastructure such as schools has not been considered; developers already over develop sites and this would encourage this trend to continue; and need and demand should be met as close to where it arises. There is an over-reliance on small sites and increasing this will intensify the lack of mainstream family housing for local residents which can only be addressed by allocating more sites.

The capacity of existing settlements to meet future housing needs by means of settlement boundary changes should be considered in advance of increasing the contribution of small sites. Increased building should concentrate in Perth to allow it to continue to develop as an important City and economic centre, and where there is much more scope and less impact on infrastructure, amenity etc.

OTHER COMMENTS

One respondent considered that insufficient data had been provided to evaluate the need for the increase in the contribution from small sites, nor had information been made available on how the associated increased demand on infrastructure and services was to be met.

COUNCIL RESPONSE

An evaluation of past completions data highlighted that the contribution from small sites in the Highland HMA has in some years been higher than 20%, averaging 36% between 2010 and 2016, and in some individual years was significantly higher, e.g. in 2015/16 the percentage was over 58%. This reflects the predominance of small settlements and development opportunities in this, largely rural, area. A balance needs to be struck between reflecting the essential contribution small sites make to the overall supply in the Highland area, and continuing to meet the majority of the housing land requirement on allocated sites, whilst still ensuring that a 5 year supply of effective land is maintained. A 20% contribution was therefore considered appropriate and realistic. However, the calculation of the housing land requirement and supply for the Proposed Plan using the 2016 Housing Land Audit showed that increasing the contribution from small sites would not be necessary as there is sufficient supply (together with windfall and a 15% small site allowance) to meet the housing land requirement set out in TAYplan.

It is considered that in most cases there are already opportunities for small scale development within existing settlement boundaries. The majority of the housing land requirement will be met on allocated sites in the principal settlements in line with the TAYplan spatial strategy; the Council does not therefore agree that settlement boundaries require to be loosened in order to meet the housing land requirement.

Question 4:

Do you agree that the Council should introduce new policy RD7 to ensure stalled and non-effective sites are brought forward?

Yes/No

Please briefly tell us the reasons why

KEY AGENCIES

SNH agree in part subject to reference to the Delivery Strategy addressing the delivery of essential green infrastructure as well as funding and timescales.

TACTRAN support the approach and state that a key part of the Delivery Strategy should be considering transport connections

Scottish Enterprise supports the approach but identify that realistic expectations have to be placed on stakeholder to facilitate delivery. Unrealistic expectations would slow down delivery.

SUPPORT

Homes for Scotland agree to the principle of the policy as it is trying to deliver housing but concerned that the infrastructure providers may be an issue as it is difficult to agree a position with them. The Council should help facilitate infrastructure delivery.

The main points raised in support of the Policy are as follows:

- Helps ensure sites identified in the LDP are progressed, provides greater control, greater structure to the detail of the development;
- Policy should apply to smaller sites where part is only available for immediate development;
- Helpful to give a realistic delivery programme. Could cause developers to look at other Council areas where it does not apply;
- Current strategy of large sites can cause delay in delivery due to different ownerships;
- Will support the delivery of smaller sites where the strategy for larger sites has not been effective;
- Welcome only if effective in supporting delivery. Delivery Strategy for larger sites will need co-ordination through a masterplan with a clear time line, regulation and a system of bonuses and penalties;
- Should not apply to sites of less than 20 units. Current planning process sufficient incentive for this scale;
- Cut off point should be 100 units;
- Should apply to sites of 200+ units;
- Should apply to sites of 300+ units;
- Care must be taken that additional requirements are not overly onerous and delay housing delivery. Need to be clear what is required to support the policy and what happens if there is disagreement between parties, including arbitration;
- Non-effective sites should be removed through the LDP review;
- Broad principle acceptable but more detail as to how it would operate required;
- Acceptable providing realistic expectations are placed on stakeholders;
- Important that only effective sites of those that will demonstrate become effective within the LDP period are allocated in the first instance;
- If sites cannot be progressed mechanism to allow for Council to bring forward other sites to maintain effective Housing Land Supply;
- Aligned with SPP in terms of encouraging partnership working and the delivery of new development and better enforcement of deliverability;
- Essential Infrastructure providers could be weak link in process. They should be bound to engage at an early stage. Council need to facilitate engagement with essential infrastructure

providers and stakeholders so as not to be additional burden on development industry or prejudice landowners with a lack of experience with the planning system;

- The compliance criteria should be in the SG but within the LDP;
- Should allow for flexibility if circumstances change.

OPPOSITION

Development Management state that it may be difficult to put into practice. It would be better to remove non-effective sites from the Plan. Policy needs to take account of market forces.

The main points raised against the Policy are as follows:

- Policy wholly inappropriate as it places additional burden on development industry. Site delivery depends on a range of factors which will not be addressed by the policy. The Housing Land Audit is sufficient;
- More of a stick than carrot; must have regard to changing economic circumstances;
- Unnecessary layer to the planning process which could delay delivery of sites;
- Unlikely to succeed as relies on actions of multiple agencies and third parties. Will not ensure delivery and does not address the consequences of what will happen if sites not progressed. LDP needs to include policy to allow for the release of effective sites to maintain effective Housing Land Supply;
- Hard for realistic programme of delivery to be produced within one year of plan adoption. Delivery Strategy as an extension to a Processing Agreement may be acceptable to co-ordinate the delivery of sites but with timescales being indicative only;
- Until a developer involved not possible to dictate programme of delivery. Duplicates the Housing Land Audit and Action Programme;
- Should not be applied to smaller settlements/developments sites where community sensitivities might be greater. Policy should only apply in these settlements after the outcome of an appropriate Charrette/Placemaking event has been carried out.

SUMMARY

A total of 57 responses have been received. The majority (41) are in support of the Policy, 11 object and 5 responses are undecided whether it is required.

It is clear that there is general support for the policy as it is seen to provide greater control to ensure the timely delivery of LDP sites. But it is also clear that the policy is viewed as a way to support the delivery of other sites not identified in the LDP if the LDP sites are not being progressed. It is viewed that it will help with partnership working at an early stage to move sites forward but concern is raised that infrastructure providers could cause a blockage and the Council should facilitate the engagement between infrastructure providers and developers to stop delays. Further detail as to how the policy would operate in practice is also required.

The objections to the policy are on the basis that it is another unnecessary burden to the development industry and delivering development. It does not take account of the wide range of factors which impact on the delivery of sites. It is also viewed as duplicating the function of the Housing Land Audit and Action Programme. Providing an accurate Delivery Schedule within one year of adoption of the LDP is also seen as difficult.

COUNCIL RESPONSE

Please see Council Response to Question 6

Question 5:

What enforceable mechanism could be used to ensure development commences within a specified period of planning permissions being granted and to ensure that phasing is tied to the Delivery Strategy? Please briefly tell us the reasons why you are suggesting this mechanism.

No key agency commented on Question 5.

OTHER ORGANISATIONS

Development Management responded that if there is no delivery strategy within a specified time perhaps should remove the site from the LDP. Practicality of developing a site should be established before being included in LDP. Regarding the enforcement mechanism the market situation will be relevant. If site has started but stalled without reasonable justification a notice under S.61 could be considered. Revocation under S.65

Homes for Scotland state that conditions attached to planning consent and tied to Delivery Strategy are sufficient to ensure development proceeds. No new enforcement mechanism required.

OPPOSITION

The main points against any mechanism are as follows:

- Already exists. Planning consents are time limited. Should not be tied to delivery strategy;
- Not appropriate, current enforcement powers suitable;
- Council has power through Section 61 of the Town & Country Planning (Scotland) Act 1997 to ensure sites are completed;
- Council has power through Section 58 of the Town & Country Planning (Scotland) Act 1997 (as amended) to implement other durations for planning permissions beyond 3 years;
- No enforceable mechanism. Planning renewals should take account of most up to date policy position.

SUGGESTED MECHANISMS

The suggested mechanisms are as follows:

- Through Delivery Strategy and Masterplan
- Developer Agreement
- Revocation of planning consent or financial penalty
- Council to determine a mechanism
- Condition attached to planning consent tied to Delivery Strategy
- Delivery strategy should include dates for commencement and completion if not met an application to modify dates required and an increase in S.75 payment required.

- Better definition of what constitutes commencement of development;
- Focus on delivery not commencement;
- Conditions placed on consents and penalty clauses where work is not completed on schedule;
- Terms and conditions placed on sale of land requiring site delivery with agreed timescale;
- Consent should last 2 years for small developments and 5 for larger ones. If not met developer has 6 weeks to start or a new application required;
- If planning consents not progressed sufficiently then they should lapse and other sites brought forward;
- Refuse renewals of applications or remove from LDP;
- Remove sites as being ineffective if not delivered in accordance with the Delivery Strategy;
- Where there is a site with no developer interest and doesn't come forward doesn't change the merits under which it was first identified;
- Planning application to be submitted within 3 years of adoption of LDP Only enforceable mechanism is legislation;
- All social housing should be built on sites first to ensure developers complete remainder of site;
- Town and Country Planning (Development Management Procedure, Scotland) regulations 2013 provides sufficient scope to use conditions relating to pre-commencement activities and time limited controls.

SUMMARY

A total of 34 responses have been received. 5 responses stated 'Yes', 9 stated 'No' with the remaining 20 simply providing a view on the question.

There is no clear single mechanism put forward with the majority of suggested mechanisms would not accord with current planning legislation. It is suggested that current legislation provides sufficient powers to ensure developments are completed or if not consents not renewed and sites removed from the LDP when reviewed.

Planning consents/LDP allocations could be tied to Delivery Strategies whereby if the targets are not met then Council would consider whether to renew the consent or remove from the LDP at review. But it is identified that if a site doesn't progress due to market conditions or developer interest it does not mean that merits of the site have changed from when it was first identified.

COUNCIL RESPONSE

Please see Council Response to Question 6.

Question 6:

Do you agree that this policy should require the Delivery Strategy for larger sites (over 300 houses) to demonstrate how delivery can be maximised, including by involving a range of developers and provision for self build?

Yes/No

Please briefly tell us the reasons why

KEY AGENCIES

SNH state that Delivery Strategies should address site specific developer requirements such as biodiversity as well as funding and timescales.

TACTRAN agree and identify that this approach is essential to ensure that essential transport infrastructure is properly planned and in place of house occupancy.

SUPPORT

Development Management agree that the Delivery Strategy should be part of the masterplan. 300 units is too high a threshold (limited sites in P&K of this size), 100 units would be better.

Homes for Scotland agree in principle but note that it might be difficult to implement due to marketability and legal issues. The market determines how many developers operate a site and this has associated legal sensitivities. Self-Build better suited to small scale sites, less manageable on large sites.

The main points raised in support of the Policy are as follows:

- Should encourage diversity of design, not monochrome sites;
- Lack of Landowner Agreements delaying sites;
- Beneficial in moving developer agreements forward;
- Larger sites benefit from a range of developers involved;
- Welcome only if effective in supporting delivery. Delivery Strategy for larger sites will need co-ordination through a masterplan with a clear time line, regulation and a system of bonuses and penalties;
- Cut of should be 100 units;
- Delivery strategy should include a timeframe (start date, phased plans, finished building date, type & quality of units) in outline, infrastructure considerations and developer contributions;
- Commercial negotiation with a range of developers while providing self-build plots could lead to a delay in housing delivery. Self-build plots should be on smaller sites and interim servicing arrangements considered in advance of connection to wider infrastructure;
- Would demonstrate that developers have a resourced and structured plan in place;
- Would ensure full site potential realised and allow sites to continue if there is a dip in the market;
- Market conditions will still determine how many units can be sold on a site;
- Council should focus on sites in single ownership;
- Inclusion of self-build would be a boost to diversity;
- Self-build should be made easier for applicants even out with designated areas;
- No one developer should control large development sites;

OPPOSITION

The main points raised against the Policy are as follows:

- Not for Council to tell developers how to build, but ensure that sites are not left semi-finished for long periods of time;

- Little detail on how it will operate. It should be for developer/landowner to determine how many developers operate on the site and on Self-Build delivery;
- Not clear what is being sought to maximise, density, speed of construction, diversity of house type;
- Self-build more suited to one-off sites and small groups of residential development;
- No requirement for Delivery Strategy, replicates Action programme;
- The Council should not stipulate how many developers involved in a site. Council requirements could slow down progress of sites;
- Policy should read 'On sites of 300 houses or more the Delivery Strategy should demonstrate however delivery will be maximised where applicable, making reference to the various developers involved and where provision for self-build has been made.'
- Documents would be out of date by time of publication. Replicates Housing Land Audit and Action Programme;

SUMMARY

A total of 37 responses have been received. The majority (22) are in support of the suggestions, 5 disagree and 10 responses did not support or object.

The responses to this question did not result in a clear point of view. While a number of the respondents identify that the involvement of different developers and the provision of Self-build is more likely to make sites progress and be fully built out while allowing for a diversity of building styles it is also clear that these issues have been identified as making sites less likely to deliver. The view against the policy is clear that the market will drive the delivery of sites and the Council should not be involved to dictate how many developers should be on site and that this could delay in moving sites forward.

From the responses it is identified that further information as to how this policy would operate is required before a clear view on it can be formed.

COUNCIL RESPONSE

The Council recognises that there currently exists mechanisms that ensure that sites progress within a specified time period and if they are shown to be non-effective can have an allocation removed through the LDP review. Through the Delivery Strategy the Council is seeking to promote clarity in relation to the delivery of sites at an early stage. Taking account of the responses to the Main Issues Report the Policy has been revised and a Delivery Strategy template has been produced to be completed by each landowner/developer for sites within the LDP within one year of the adoption of the Plan. The purpose of the Delivery Strategy is to provide a summary of how each of the elements of the site delivery will be progressed. By completing this document at an early stage it will allow for the identification of blockages to the site delivery which can enable joint working with the Council where required. This process will also bring to the fore a wide range of delivery information which will support the submission of a planning application. The Delivery Strategy will also inform not replicate the Local Development Plan Action Programme by providing a general overview of the intended progress of each site. The Council is seeking to use the Delivery Strategy as a positive process for the opening up of development sites and the consideration of the issue which prevent sites progressing.

Taking account of the site demographic across Perth and Kinross a threshold of 10 units has been applied to the Delivery Strategy requirement. Site delivery issues are not restricted to only large

300+ house developments so it is important that the Delivery Strategy applies to those sites of scale which have a bearing on the effective housing land supply.

While the Council agrees that the housing market demand is fundamental to the types of houses which are delivered on sites it is recognised that other types of delivery such as self-build plots and joint working between developers can provide a catalyst to the delivery of sites. The Delivery Strategy provides an opportunity to review the various approaches to site delivery at an early stage and allow for early engagement with the Council in order to explore options in advance of submission of a planning application.

The Delivery Strategy is not intended to place additional burdens or restrictions on site delivery. The Council is seeking to use the Delivery Strategy as a positive process for the delivery of development sites and the consideration of the issue which prevent sites progressing.

Question 7:

Do you agree that policy PM4 should be renamed 'Settlement Envelopes' and reworded to allow development on the edge of settlements in specific limited circumstances?

Yes/No

Please briefly tell us the reasons why

KEY AGENCIES

Tactran supports the proposed changes; it is essential to ensure developments takes place within settlement envelopes as much as possible so that they can be accessed by a variety of travel modes and reduce dependence on the private car.

SNH does not support the proposed changes. 'Envelopes' are harder to define and may cause confusion as to when the housing in the countryside policy should instead apply. There is also potential for adverse impacts on the landscape character and setting of settlements. The term 'boundaries' will help protect unplanned settlement growth and landscape capacity studies should be used to ascertain the best places for planned settlement growth. The text "that a suitable site is not available within the settlement envelope" should be replaced with "it is the only location where the development can be reasonably sited". Gardens should not be treated separately from 'built' development.

SUPPORT

Network Rail supports the proposed rewording to allow development outside settlement envelopes for operational reasons as this will allow a pragmatic assessment of options and decisions. Network Rail has operational assets outside settlement boundaries and has some uses which are either locationally difficult, or which it would prefer to site outside settlements to protect residential amenity.

sportscotland supports the proposed changes as this will allow flexibility for built development which may be required in connection with outdoor sports pursuits on the basis of 'locational need.'

Councillor Barnacle supports the changes and is more relaxed about proposals on the edge of settlements where community benefit can be illustrated and it cannot be located within the settlement envelope. However, the term 'specific limited circumstances' needs careful wording to avoid creeping settlement development.

The Scottish Government supports the proposed renaming and rewording. They consider it logical for the plan to be clear on its aspirations for settlements in rural areas and to apply flexibility in certain circumstances, particularly where these can be demonstrated to support fragile and remote communities as supported by national policy. The Scottish Planning Policy presumption in favour of development that contributes to sustainable development could also apply to developments adjacent to or outwith settlement boundaries and this should also be considered.

Homes for Scotland support renaming the policy but consider the policy should be further reworded as follows to allow for housing development on the edge of settlements in specific circumstances (changes underlined) : “Built development including housing should only be located adjoining and outwith those settlements which have defined settlement envelopes, providing that the proposal accords with policy ED3: Rural Business and Diversification, or the proposal is justifiable as being in a sustainable location and compliant with the terms of Scottish Planning Policy and that it can be demonstrated that a suitable site is not available within the settlement envelope”.

Further support for renaming and rewording policy PM4 largely came from landowners and individuals. Six housebuilders and four Community Councils also agreed with the proposed changes. However, of these only a small number specifically voiced support for renaming the policy.

Support is primarily due to the additional flexibility the proposed changes will allow. A Local Development Plan cannot plan for every eventuality and as such some degree of flexibility is considered appropriate in allowing valuable development which is located just outside, or straddling the defined boundary of existing settlements. Settlement envelopes / boundaries are often too tightly drawn and do not allow logical sites to be developed. The development industry and land owners require a more nuanced approach to development on the edge of settlements.

The changes to the policy will assist in the delivery of new housing close to services allowing the sustainable use of existing services and infrastructure within settlements. They will provide opportunities for small and single house developments, including self-build, allowing a wider range of development types and tenures without detriment to the established community. The changes would also allow the delivery of sites such as brownfield sites on the edge of settlements, the development of which can often have wider benefits and be supported by national planning policy.

Settlement boundaries should not restrict the growth of rural businesses and so the priority to policy ED3 is welcomed. A policy framework that can positively respond to opportunities for small scale economic development close to existing settlements must be a priority of the proposed plan.

Additional changes proposed

Some respondents, whilst agreeing with the general thrust of the changes proposed, considered that they do not go far enough in terms of the flexibility provided. There is concern that the wording could be overly prescriptive and constraining; Scottish Planning policy requires development plans to “meet the needs of the plan area in a way which is flexible enough to adapt to changing circumstances over time” (para.30) and the Council is urged to further work this focus of national policy into the emerging LDP2 policy framework to ensure that rural development proposals are not adversely constrained.

In particular, a number of respondents suggested that the policy should be amended to allow housing developments on the edge of settlements. Appropriate situations could include: where the location is sustainable and is in line with Scottish Planning Policy; where housing development could

enhance the landscape and biodiversity (for example, in conjunction with appropriate associated land management); where development would aid the delivery of brownfield sites which meet all other Plan policies; where housing development would bring about wide ranging and positive impacts such as employment opportunities and developer contributions; or where development is infill rather than open countryside and the principle of development has already been established. Proposals should be considered on their individual merits and not just in relation to small scale rural development. The local context should be considered. The policy should not prevent the release of greenfield sites where this is consistent with addressing housing delivery problems.

It is important that the policies of the Plan provide a context within which development can be clearly directed to places where development should and should not be supported. Whilst a pragmatic view should be taken in some circumstances, greater weight should be given to the views of local residents and stakeholders in exchange for the greater flexibility given by the planning process in maximizing a development opportunity.

A number of specific changes to the policy wording were suggested (underlined):

- “The drawing of a settlement envelope should not result in a total prohibition of all development on the edge of the settlement. Built development should generally not be located adjoining ...within the settlement envelope. The Council will, in the application of this Policy, take cognisance of local circumstances.” This flexibility is necessary in this Plan area and is in line with Scottish Planning Policy.
- A clause should be included to permit appropriate housing development where there is a shortfall in the 5 year effective housing land supply to enable efficient determination of planning applications in these circumstances. Following on from the last sentence: “Housing development will be supported at the edge of existing settlements in the circumstances where there is a shortfall in the 5 year effective housing land supply in accord with Policy XX.”
- The phrase “...and it can be demonstrated that a suitable site is not available within the settlement envelope” has the potential to lead to future confusion and should be removed.
- The revised policy should also refer to policy RD3 Housing in the Countryside to ensure that any potential contradictions can be addressed.
- Policy note 2 is not required as it does not reflect a flexible policy promoting development and growth and could be used negatively.
- The current approach presumes against small and windfall housing development at the edge of settlements in the Highland area, but provides a more supportive framework for housing in the countryside. A third policy note should be added: “Within the Highland HMA, proposals for housing development adjacent to existing settlement envelopes may be supported in the following circumstances where: the scale of the proposal is in keeping with the existing locality; it is demonstrated that suitable access can be achieved; the proposal does not adversely affect the landscape character of the area – new landscaping will be required to provide a robust edge to the development; the architectural form and massing of the new housing is in keeping with the existing locality; infrastructure capacity is available or can be made available to accommodate the proposal.”

OPPOSITION

Further objection to renaming and rewording policy PM4 largely came from landowners and individuals. Two Community Councils / other Community organisations also disagreed with the proposed changes. Again, only a small number specifically voiced their objection to the renaming of the policy. A number of those who disagreed with the changes to the policy wording did so because

they considered that they did not go far enough. These comments are included in the 'Additional changes Proposed' section above.

Some specific objection to the proposed renaming of the policy to 'Settlement Envelope' was raised. The term 'boundary' is considered to offer a greater degree of protection. One alternative view is that the concept of a settlement envelope is in fact too inflexible and if the Council wishes to attract investment the policy needs to be more welcoming and less restrictive.

The primary objection to the proposed rewording is that a relaxation of the policy, or introduction of increased flexibility, will potentially have undesirable consequences. The proposed changes would introduce the opportunity for liberal interpretation and undermine and dilute the effectiveness of the Plan to adequately control development through clear prescriptive policy. Policy PM4 needs strengthened not weakened. The policy is already being diluted and abused as other policies in the plan are being used to justify departure from policy PM4.

The proposal to include 'locational need' as a criterion would be open to abuse and exploitation. Any development outwith the settlement boundary can lead to further planning applications, for example, a business use which then 'needs' a house alongside to support the business, or extended gardens which can become a future house site if the plot is permitted to be too large. It is important to have a defensible boundary which can be protected in order to avoid development in conflict with the interests of the community; settlement **boundaries** should mean just that as any blurring of the definition will inevitably lead to more building in the countryside.

COUNCIL RESPONSE

The changes proposed in the MIR to policy PM4 were in response to issues which have arisen in the application of the policy.

The change in title from settlement 'boundary' to 'envelope' was intended to more accurately reflect the balance between protecting settlements from creeping development whilst allowing those developments which are necessary to support rural businesses and communities. However it is acknowledged that the term 'envelope' does perhaps suggest there may be a greater degree of flexibility than the term 'boundary'. The Proposed Plan will therefore revert to 'settlement boundaries' and instead make it clearer the circumstances under which development on the edge of the boundary may be permitted.

Disagree that revised wording is overly prescriptive and constraining. Expanding the exceptions further to include proposals which contribute to sustainable development is considered too broad and could have an adverse impact on the delivery of the spatial strategy. This is, and should remain, a restrictive policy and as such policy note 2 is relevant and should remain (as amended). To relax the policy any further would question the value of retaining boundaries at all.

Policy PM4 as currently worded conflicts with policy ED3 and as such introduces uncertainty; the changes clarify the circumstances under which development will be permitted on the edge of settlements, and removes this conflict. Policy ER6 will continue to protect landscape character and setting of settlements. The views of local residents and stakeholders will continue to be taken into account through the planning application process although the Planning Authority is obliged to assess applications based first and foremost on the policies of the development plan. The requirement to demonstrate that a suitable site is not available with the settlement boundary is an important caveat and will ensure that applicants actively consider all possible options within the boundary first.

Specifying 'built' development in the policy will allow the flexibility to permit some development, such as extensions to garden ground, which will not have an adverse impact on maintaining the integrity of the settlement boundary. Consideration could be given through the planning application process to removing permitted development rights for such extensions beyond the settlement boundary in order that any subsequent application for built development, for example a shed within the extended garden ground, would be subject to the policy.

The suggested additional policy note relating to the Highland area would potentially allow development, primarily housing, which would conflict with the aims of the policy itself. Introducing the suggested additional circumstances under which development would be permitted on the edge of settlements in the Highland area would largely remove the distinction between those settlements which have a defined boundary and those which do not thereby questioning the value of having settlement boundaries in the Highland area at all. The preference is to continue to have planned growth through allocations in all but the smallest settlements.

It is agreed that it is appropriate to include a clause to permit housing development where there is an identified shortfall in the 5 year effective supply.

Minor wording changes are proposed in response to comments to add further clarity.

Question 9:

Do you agree with the proposed Green Belt boundary changes (Maps 2 + 3) ?

Yes/No

Please briefly tell us the reasons why

KEY AGENCIES

SNH have some concerns about the proposals which are driving the changes to the Green Belt boundary, rather than a change in the Green Belt boundary itself. The significant proposals are Perth West, the Cross Tay Link Road (CTRL), and Scone North. At Scone, they do not support the change of boundary as it will result in the loss of woodland listed on the Ancient Woodland Inventory (AWI) and impact on woodland habitat connectivity. Although the MIR states (3.5.6) that "the developer requirements will ensure no net reduction in woodland cover" SNH do not consider this sufficient as ancient woodland sites are irreplaceable (SPP paras 216-8). They refer to the Scottish Government's Policy on Control of Woodland Removal's strong presumption against removing this type of woodland and where it would lead to fragmentation /disconnection of forest habitats, as in this case.

Historic Environment Scotland notes the intention to change the boundary at Scone and states that further encroachment of development within the designed landscape could have an adverse effect. They are content, however, that this can be mitigated through sensitive design, layout and landscaping. They request to be consulted on any proposals. The reasoning behind the significant boundary changes to the Green Belt in view of the Cross Tay Link Road (CTRL) is noted. They acknowledge that much work has gone into the design and location of the CTRL to minimise its impact on the Scone Palace Inventory Designed Landscape and substantial areas of nationally important scheduled monuments in the vicinity of the proposed route. The environmental assessment of this element of the MIR notes that the current extent of the Green Belt allows for greater protection covering a larger area and any decision on the removal of this area should be considered in light of this. HES have offered further detailed comments on the environmental

assessment of this issue in their response to the Strategic Environmental Assessment. Perth West Greenbelt Boundary Change is also noted and HES has concerns regarding the Inventory Battlefield site of Tippermuir in terms of development. They support the need for a conservation plan for the area to ensure that the setting of scheduled monument Huntingtower Cairn (Index no. 2477) and the battlefield are effectively managed.

SEPA have no comments regarding this issue.

SUPPORT

Seven representatives agree with the Green Belt boundary changes. They considered that the Green Belt should provide flexibility for economic and industrial developments, including the incorporation of new transport routes, in this case the Cross Tay Link Road. It was also noted that measures can be taken to minimise the visual and environmental impact of these developments on the Green Belt. It was acknowledged that Green Belts require robust boundaries and that the changes to the Green Belt were to accommodate the proposals for settlement expansions as part of a planned broader spatial strategy defined in the SDP and LDP. It was also considered that it is important to show flexibility and that the change of boundaries could have the potential to allow for initiatives such as woodland burials. There was also a request made for a further change to be made to the boundary at Balboughty.

OPPOSITION

Over 40 representatives said no to the Green Belt boundary changes. This was for the following reasons:

There was a fundamental disagreement with changing the Green Belt boundary. The respondents felt that the Green Belt is a vital protective policy that prevents the spread of development in areas of important landscape value. Concern over loss of ancient woodland, prime agricultural land, habitats for endangered species and green space were all referenced as arguments for retaining the current boundary. Respondents also stated that the changes were not compliant with Scottish Government protocol and that changing the boundaries so soon after the adoption of the previous Local Plan. A number of respondents noted that they considered there to be enough development land available already and that both the LDP and TAYplan agree that the Green Belt should be designed to strictly control excessive expansion of built development. Furthermore, a respondent noted that the MIR (2016) states that the Green Belt is vital in ensuring sustainable development within locations such as Scone. The proposed changes to the Green Belt is generally considered to undermine the overall policy and several respondents promoted the idea of using brownfield sites instead of greenfield land. The concentration of housing development on edge of settlement sites was considered to create unattractive and empty town centres. It was also perceived that this change to the boundary was to assist developers rather than the local community. One respondent stated that they would prefer not to see an overall blanket change to the boundary but rather ensure that further development applications are put under greater scrutiny by being within the Green Belt area.

There were considerable area-specific concerns regarding changes to the Green Belt boundaries: The Scone Housing site H29 Green Belt change raised concerns with regards to the impact on the ancient woodland and Scone Palace estate. A large number of respondents felt that the Green Belt boundary should not change other than to incorporate H29 back into the boundary and deallocate the site. One respondent voiced this change to the boundary as “the wilful destruction of this beautiful village and area” and would encourage further development beyond the settlement envelope. It was also noted by two respondents that this boundary change would accommodate the

premature start on H29 site. There was scepticism for the purpose of this change and it was noted that this minor change was to facilitate development rather than create a more sustainable design for the site. It is perceived that the changes might cause further issues with drainage and that the location of the current ALP site H29 is too close to the airport. Impact on recreational resources, wildlife, quality of life, overcrowding, loss of identity and traffic were all cited as problems if this boundary change were to be implemented. The CLTR was specifically highlighted by many respondents with concerns that development will take place before the issues surrounding congestion have been resolved, and that Bridgend is already suffering as a result of increased traffic. The proposal to change the Green Belt at Perth West also raised similar objections. Nonetheless, objections to this boundary change have been considerably less than in the case of Scone. It was raised that the Green Belt would be even narrower in this area and the respondent felt it should actually be increased around Noah's Ark to prevent further development. One respondent considered the change of boundary to be premature in terms of the delivery of development within the Perth West area and proposed that the change not be made until the next LDP to ensure that it did not influence the delivery of currently allocated housing sites. They also noted the Charrette Masterplan Framework Report also supports the re-designation of an area (west of Noahs Ark) which was excluded from the Masterplan area due to the landowner not favouring development. The respondent considered that this should therefore be returned to the Green Belt. There was general concern that this boundary change would encourage large scale development and that the area was too large.

OTHER

One respondent stated that they had no objection to a change of Green Belt boundary but considered the current boundary to be rather arbitrary and would benefit from woodland planting.

COUNCIL RESPONSE

Many of the objections raised are focused on the housing allocation at Scone North and are local Scone issues regarding congestion, access, the CTLR, the location, loss of ancient woodland, drainage, open space, affordable housing, visual impact, impact on local amenities and biodiversity. A change in the boundary of the Green Belt does not have a direct impact on these issues as other Local Development Plan policies will continue to protect habitats, biodiversity, archaeology, open space, affordable housing, landscape impact and access. Furthermore, changing the Green Belt boundary would not allow for widespread development as the countryside would still be protected by the Housing in the Countryside policy.

The CTLR is aimed to assist with congestion in Bridgend and this is likely to commence by 2020 which is within the lifespan of the current LDP. Work is advanced in terms of Perth West Masterplan and therefore the boundary change is to reflect this. As the CTLR is likely to commence before the end of the adopted Plan period, it is recommended that the greenbelt boundary is changed to reflect this new and robust greenbelt boundary. This is in line with Scottish Government advice regarding green belt boundaries. In terms of the small change to the Scone North site, it is recommended that the greenbelt does not change in line with the comments from SNH. In terms of Perth West, it is recommended that the Council makes changes to the greenbelt boundary to reflect the changes to the Perth West site.

Question 10:

Do you agree that the Green Belt policy should be changed as proposed to allow more scope for development within the Green Belt?

Yes/No

Please briefly tell us the reasons why

KEY AGENCIES

SNH neither support or object to the proposed changes but suggest further modification of the policy to take account of the Green Belt purposes of landscape setting and identity of settlements (changes underlined): “For all proposals, development must be appropriate to the overall objectives of the green belt in maintaining character, landscape setting and settlement identity. All proposals for new buildings or extensions to existing buildings must be of a suitable scale and form, located and designed in such a way so as not to detract from the character and landscape setting of the green belt. Appropriate measures may be required to mitigate any adverse impact on the character, setting and identity of the locality.”

SUPPORT

Homes for Scotland support changing the policy to allow for more scope for development but suggest an additional criterion: “(g) It can be demonstrated that the housing development is sustainable and complies with the principles of Scottish Planning Policy”. They note that Scottish Planning Policy states that for most settlement a green belt is not necessary as other policies can provide an appropriate basis for directing development to the right locations.

Network Rail supports the change to (f). This allows for a considered approach to be taken to operational and strategic requirements and options.

A degree of support for rewording the policy came from landowners, individuals, four housebuilders, two Community Councils and an energy company.

A Green Belt designation should be an opportunity to effect positive changes to the quality and value of the land, the more positive presumption in favour of acceptable forms of development is therefore welcomed. The Green Belt function to protect the setting of the city can still be achieved whilst allowing development opportunities. Furthermore, the changes would complement the increased flexibility proposed for Policy PM4 ‘Settlement Envelopes’.

Some respondents only supported the changes providing that the terms of policy NE5 are strictly applied and adhered to; the rules must not be relaxed over time. In particular there is a need to be careful in the siting of aerials / masts and chimneys. The changes to allow housing proposals in line with categories (d) and (e) of the Housing in the Countryside policy is welcomed providing that the overall principle of controlling development is fully implemented, and not too many are allowed in one area. All development should be considered on a case-to-case basis and limited in size. The term “suitable scale and form” must be defined, and far stronger restrictions should apply under (f), particularly on renewable development within the Green Belt; a statement identifying the search area and the site options assessed **must** be supplied.

One respondent, whilst not specifically agreeing with the proposed changes, commented that Green Belts were never intended to prevent development completely. Green wedges or fingers can be a better solution, as 'belts' are often jumped across leading to longer commuting distances and less desirable development patterns.

Additional changes proposed

Some respondents, whilst agreeing with the changes proposed, considered that they do not go far enough. In particular, the policy should be further changed to allow housing development under more of the Housing in the Countryside categories. Policy RD3 categories (a) building groups, and (b) infill sites should be included. These are already strictly controlled and additional restrictions within the Green Belt are unnecessary. If a site meets the criteria under policy RD3 then such a use would not adversely impact the function of the Green Belt but would facilitate the wider principles of the policy in terms of diversifying the rural economy and encouraging public access.

Most of Policy RD3 category (c) new houses in the open countryside should also be permitted within the Green Belt. There are already sufficient restrictions within the policy and associated supplementary guidance to protect the setting of Perth. Development within walled gardens will be self-contained and have no impact on the wider landscape. Preventing houses associated with an economic activity appears contrary to the need for sustainable development. Relocation from flood risk areas and proposals for eco-friendly houses should be allowed. Lastly, Policy RD3 category 6 Rural Brownfield Land should be included to assist in protecting and enhancing the attractiveness of the Green Belt. Not allowing the opportunity to improve the local environment by permitting small scale housing is detrimental to the setting of Perth.

A number of additional changes were suggested:

- The policy should have the flexibility to allow development where there is a shortfall in the housing land supply, without the need for a Development Plan Review. The release of Brownfield sites in particular was suggested.
- The policy could instead be amended to facilitate further appropriate development where in effect the Green Belt washes over the development e.g. the RBS HQ at Edinburgh.
- The policy should support development where there is a clear environmental or amenity gain which enhances those amenity and landscape qualities the Green Belt designation seeks to protect. For example, tree planting or biodiversity gains.

Specific wording changes are also sought in relation to renewable energy (additional text underlined and text to be deleted struck through): "Within the area designated as Green Belt, development will only be permitted where:

f) It constitutes essential infrastructure such as roads, other transport infrastructure, wind turbine developments, other communications masts and telecoms equipment ~~or renewable energy...~~

g) It constitutes non-permanent renewable energy development where it can be designed in such a way that biodiversity will be enhanced, and the landscape impact is minimal or can be mitigated. A statement may be required setting out the reasons why a Green Belt location is optimal for the project. Any such proposal will also need to demonstrate that it accords with the overriding objectives of the green belt."

It is inappropriate to group all renewable energy developments together with road, other transportation and telecommunications infrastructure projects in terms of how they will be assessed, and to impose the same restrictions. Many renewable energy developments have much

less potential for adverse impact. Renewable energy proposals should be required to demonstrate how they can enhance the character and quality of the Green Belt, rather than demonstrate that there are no alternative sites outside the Green Belt. The wording changes are necessary so that the new policy offers clarity on appropriate siting criteria for all forms of renewable energy including large scale solar PV. The visual impact of ground-mounted solar PV panels beyond the site boundary can be mitigated relatively easily.

OPPOSITION

Further objection to rewording the policy came primarily from individuals. Two Community Councils also disagreed with the proposed changes.

Many of those responding to this question were primarily concerned with the proposed change to the Green Belt boundary at Scone, discussed under Q9, rather than changes to the policy wording. Relevant to the consideration of the proposed changes to the policy itself is the significant level of opposition to any loss or erosion of Green Belt land. Boundaries should have permanence and not be continually threatened.

A significant concern at the proposed changes to the wording of the policy is the potential adverse impact of relaxing the policy to make it easier to build in the Green Belt, for additional housing development in particular. Building on Green Belt land should be exceptional but the proposed Green Belt policy offers six ready-made exemptions. The Green Belt was designated for good reason, what is the point of having a Green Belt if more and more development is allowed to take place there? Once the rules start to be changed no land will be safe from development. Development should be directed to land outwith the Green Belt and brownfield sites in the first instance.

Specific issues were raised in relation to renewables. Reference was made to the forthcoming supplementary guidance on “Spatial Strategy for Wind Energy Developments” and the potential impact of this on the Green Belt policy.

COUNCIL RESPONSE

The Green Belt is a living landscape and it is not appropriate for the planning system to seek to prevent all development. Scottish Planning Policy allows for certain developments within Green Belt and policy NE5 reflects these whilst protecting this important area from the most potentially harmful developments.

The intention of a Green Belt designation is to impose significant restriction on the development which is allowed to take place. Scottish Planning Policy lists those uses which may be appropriate within the Green Belt but this does not include housing. The previous LDP Inquiry concluded that: ‘there is no justification for permitting houses within the green belt under the proposed housing in the countryside policy, as the objectives of green belt designation justify a significantly greater degree of control over such forms of development and any economic or social benefits of permitting additional development would be outweighed by the harm to the integrity and effectiveness of the green belt that such development would cause.’ This said, and in recognition of the contribution housing can make in terms of bringing redundant buildings into use and the need in some cases for housing associated with rural businesses, it is accepted that housing under these circumstances may be appropriate in the Green Belt. However, given the restrictive nature of the Green Belt policy it is considered appropriate to continue to strictly limit the circumstances under which new houses are

permitted. The policy has not therefore been amended to include more categories of the Housing in the Countryside policy RD3. On the same basis it is not considered appropriate to amend the policy to allow housing which can be demonstrated to be sustainable, or to allow development where there is a shortfall in the housing land supply.

The policy already supports development which offers an environmental or amenity gain under (c) woodlands or (d) improving public access. No further changes are considered appropriate.

The policy allows for essential infrastructure development within the Green Belt. This reflects Scottish Planning Policy. It is not considered necessary for the policy to distinguish between renewable energy and other forms of infrastructure as the principle is the same. Nor is it considered appropriate for the policy to offer encouragement specifically for renewable energy proposals given that the overall aim of the policy is to limit development within the Green Belt. The area of land falling within the Green Belt is a very small percentage of the total land area of Perth & Kinross. It is therefore appropriate to retain the presumption that only that infrastructure which is essential and cannot instead be located outwith the Green Belt should be permitted.

The minor amendments to the policy requested by SNH reflect Scottish Planning Policy and are therefore considered appropriate. It is not possible to define the term 'suitable scale and form' in such a way as to cover all possible eventualities. Professional judgement will be used to assess whether the scale and form of a proposal is suitable.

Question 11:

Do you agree that Policy ER1 should be amended as proposed in the preferred option to provide support for district heating proposals and to better enable these proposals to be assessed under LDP2, including the use of heat mapping?

Yes/No

Please briefly tell us the reasons why

See response below.

Question 12:

If not, which alternative approach to addressing the issue of district heating would you suggest the LDP could take and why?

SUMMARY OF RESPONSES

There is broad support from the majority respondents for the Council supporting the roll-out of heating networks through the preferred option, with exception of a number of volume housebuilders who hold reservations about the principle of district heating as part of the delivery of houses from private sector. Homes for Scotland agree to the proposed change in policy in principle but raise concerns if there are potential implications on the delivery of housing. Key agencies and other stakeholders (e.g. RSPB) provide comments on how to support district heating within the area, as well as various businesses/landowners (e.g. Binn Group, Lamberkin Trust) demonstrating a willingness to assess the viability of new systems as part of their ongoing work interests. Key issues

raised by housebuilders centre around development viability and compelling customers to connect to a heating system that is out-with their choice.

COUNCIL RESPONSE

The Council is required under Scottish Planning Policy to promote the use of district heat networks in the area including the use of heat mapping to identify potential and existing district heat opportunities. A new policy has been developed to cover heat networks and the range of relevant factors to be considered, in line with National Policy. The new Policy will cover a) Heat Network Zones, Major Developments, and LDP site allocations, b) co-location, c) energy sources/storage, and d) Energy Statements. In addition, the Council has identified a requirement to prepare Supplementary Guidance on Heat Networks and will be prepared in due course. The Council will work with landowners and developers to identify opportunities for the roll-out of heat networks.

Question 13:

If you wish to see changes made to the boundary of any of the towns or villages within the Perth Area, please indicate which settlement and provide details of the change you think should be made.

KEY AGENCIES

Historic Environment Scotland: Any changes to settlement boundaries should be considered against the historic character of settlements and any historic environment designations that may be affected.

SUPPORT FOR CHANGES

Abernethy: It is suggested that the settlement boundary for Abernethy should be amended to include sites on the east of the village, referenced within appendix 3 as Abernethy site 1 and 2. The representation states that given that the existing settlement boundary is defined by exposed built development the incorporation of these two sites will enable a higher quality landscape setting to be created as part of the development proposals. In addition, Abernethy has a proven track record in terms of marketability.

Bankfoot: Two respondents have suggested that the settlement boundary of Bankfoot is amended to allow for a limited growth. They assert that this growth could support and potentially improve services and infrastructure in the village. The representations include supporting statement.

Bridge of Earn/Oudenarde: It is suggested that site H72 is retained within the next LDP. However it is suggested that the indicative capacity of this site is increased to 80 units. This representation goes on to say that the indicative landscape strip shown on the Proposals Map should also be amended to reflect the approach shown in the detailed landscape plans submitted in support of the planning application for this site which is currently under consideration and due to be reported to the Council's Development Management Committee in April/May 2016 (Application Reference: 15/02176/FLM). This representation states that full details on the proposed development of this allocated housing site are set out in the supporting studies and detailed layout plans submitted in support of the current planning application. Further copies of these documents can be provided if required. **Network Rail** state that the allocation at H15 lies either side of the main east Coast Mail Line and in line with Network Rail requirements all level crossings, and in this case all farm crossing

should not be increased in terms of usage and should be replaced and any connection between the sites and over the rail line should be the subject of early discussion with Network Rail.

Support is given for the existing H14 housing site allocation which lies within the settlement boundary of Bridge of Earn. The representation states that work is ongoing on this site which is being prepared for market and the landowner is fully committed to it being deliverable in the early LDP2 plan period. This representation seeks an alteration/extension to the site's southern boundary as per the attached location plan, to bring the settlement boundary in line with existing 1970's housing at The Meadows and create a more defined edge to the settlement boundary [locational plan provided].

Support is given in favour of development in Bridge of Earn over Scone. It is suggested that Bridge of Earn would seem a far more manageable site as all infrastructure has already been put in place and the motorway links are excellent resulting in minimum disruption for existing residents and minimal infrastructure costs for council.

Burrelton: An amendment is suggested to the south of Burrelton. The respondents consider that land identified as Burrelton 2 (north) and Burrelton 2 (south) within the Pre-MIR assessment of the sites should be identified for development. They suggest that Phase 1 could be identified in the short to medium term, and Phase 2 identified for future development. They also state that both should be identified in the LDP 2 to allow an appropriately designed, mixed use masterplan approach to be developed. They consider that this strategy would bring significant benefits to the local community by supporting the upgrade of infrastructure as well as providing new housing, employment opportunities and a potential extension to the primary school. They emphasise that sites provide significant wider benefits than the currently allocated site at Balbeggie which is constrained. They propose that this site should be removed from the Local Development Plan and land at Burrelton provided in its place. The respondents have provided full submissions.

Dunning: It is proposed that there is a change to the boundary of Dunning, by extending the existing H20 allocation on its Western boundary, as additional residential development land (in line with call for sites submission for Dunning1) as it would enable the delivery of the existing allocation. It is suggested that this additional land should be allocated, as this will make the site viable and improve the effectiveness. The representation states that the extension would be supported by a landscape framework and masterplan. It is suggested that the proposed site is effective as it is in the control of a single landowner who can release the land for development, and the site is free from physical constraints, the site also does not require public funding to make the development economically viable. The submission then goes on to state that suitable provision will be made with regards to landscaping to reduce any impact on the Ochil Hill LLA. The representation states that this site would not be contrary to TAYplan as the adopted TAYplan states that development should be focused on tiered settlements/ key settlements, but that small scale development elsewhere should not be immediately discounted.

Errol Airfield: A number of respondents consider that land at Errol Airfield should be allocated for development and have provided full submissions regarding proposals for the site.

Forgandenny: A new residential site is proposed at Forgandenny. The site covers 0.67 Hectares (1.61 Acre) and it is suggested that it will provide an effective housing site for 8 houses, supporting evidence and maps have been provided alongside this submission.

Invergowrie: An extension to the E37 boundary proposed and subsequent change to settlement boundary.

Methven: It is suggested that new development should be considered within Methven which, as it is within the defined Perth Core area and a Tier 1 settlement but there are no plans to allow additional development in the settlement. The representation identifies land at Strathview Place and states that there are no infrastructure constraints and that the land is within the hands of a builder (and of interest to other builders). This representation goes on to say that the site that could readily, within a defined landscape context (refer Landscape Assessment Plan), be developed for circa 30-40 units with no detriment to the local area or the landscape setting of Methven. It is suggested that development of this site would assist the short term land supply failings presently and in the first period of LDP2, while adding to the range of locations, choice and variety required in order to meet identified requirements. [This representation provides a supporting statement, transport assessment and a landscape assessment plan.]

Perth Airport: One respondent proposes that there is a review of Perth airport and suggests that the land should be identified as residential. A fuller submission is provided.

Scone: Several respondents consider that H29 should be removed from the LPD and MIR as Scone is already over developed and the Perth area has reached its housing quota. The settlement boundary should be changed to remove this site.

Pictonshill, Scone: One respondent suggests settlement boundary changes at Pictonshill & Bridgend to allow for housing sites. Full submissions are provided.

Tibbermore: A new site has been proposed within Tibbermore. The representation seeks the removal of land totalling 2.5 hectares acres from the greenbelt and its inclusion within the Tibbermore settlement envelope.

It is submitted that the site has the potential to provide a range and choice of land for future housing needs of around 40 units it is suggested that this would meet windfall provisions within rural areas including affordable, shared equity and self-build. The representation states that the site has the landscape capacity to accommodate a sensitively designed project, whilst infrastructure to services exists.

The representation state that they developer would support a design led approach to the site which would include adopting a pro-active approach towards meeting the housing needs of rural community through a bespoke design for the site. The representation states that supplemental information in the form of a housing layout, house type and market assessment will be submitted as to assist the councils in the preparation of the Proposed Plan during the late Spring/early summer of 2016.

OPPOSITION TO CHANGES

A number of responses stated their concern for changes being made to settlement boundaries within the Perth area. Issues raised were as follows:

- Perth and Scone should not expand any further as they would become less attractive and this could impact on them as tourist destinations.
- Changing the green belt boundary would ensure further urbanisation of the area and loss of countryside.

OTHER COMMENTS

Two representatives suggested that the local residents should be consulted. There are a number of submissions placed within the answer to this question that have been dealt with under Perth City as they are sites within the boundary of Perth. Please see this section for summaries and responses.

COUNCIL RESPONSE

The proposed boundary changes have been assessed in terms of SEA. The findings for settlements are as follows:

Abernethy: The sites on the eastern side of the village, will not give a higher landscape setting because they constitute backland development, not in keeping with the settlement pattern. They would not be consistent with TAYplan's locational priorities and have previously been considered but rejected at LDP examination.

Bankfoot: the settlement is extremely limited in terms of housing expansion due to flood risk, drainage and the primary school. A design based workshop is anticipated to be held to identify ways to support long term growth and development of infrastructure within the village. This will inform the next LDP.

Bridge of Earn/Oudenarde: The site H72 has been retained with a fresh assessment of its capacity, and an updated indicative site plan will be included that takes account of more recent submissions. Network Rail, will be consulted where development is proposed so that any impact on its operations may be assessed. Site H14 has also been retained in the plan however with its original boundary. The capacity of the site has been reassessed. In terms of whether Bridge of Earn is a more favourable development location than at Scone, it is recognised that both form part of the Perth Core Area, where TAYplan Policy 1 identifies both settlements as having the potential to accommodate additional development. While Oudenarde/Bridge of Earn is specifically identified as a transformational project where major change will happen – TAYplan is clear that both Bridge of Earn/Oudenarde and Scone are in the Perth Core Area and are therefore principal settlements. TAYplan identifies the settlements in the Perth Core Area because together they have significant land and infrastructure capacity to accommodate future development.

Burrelton: A number of sites were proposed to expand Burrelton. Nonetheless, this settlement is outwith the Perth Core Area and has a limited range of local facilities. A small site has already been allocated in LDP1 and as this is currently under the embargo for the area, the settlement does not require any further growth during this plan period.

Dunning: At Dunning, additional consultation was carried out at Main Issues Report stage into the suggestion for an expanded housing proposal H20 at Auchterarder Road.

In terms of roads capacity, our colleagues in the traffic and network team have assured us that there have been no significant issues regarding traffic management or road safety in Dunning. Occasionally, there are some, short-duration congestion issues around the primary school on Station road or near the shop at Kirkstyle. There are occasional difficulties for large commercial vehicles accessing the meat processing plant on the B934 Thorny Hill Road.

In terms of access to the site, a Transport Statement would be required alongside any planning application for this development. This would assess the proposed vehicular access solution (ensuring that the geometry and the visibility splays are appropriate for the vehicle speeds in the vicinity), and

would also assess the sites accessibility via sustainable travel modes including the provision of adequate public transport infrastructure and facilities for walking and cycling.

Concerning school capacity, the school was extended in 2008 and it is anticipated that the roll can be managed within the existing accommodation without the need for another extension. Should this site come forward for development, phasing of 10/15 houses per year beyond 22/23 would be manageable.

In terms of biodiversity, there is unlikely to be a significant impact on biodiversity. The loss of mature trees and hedgerow should be minimised and any mature trees to be lost will require bat roost potential surveys. A breeding bird survey will also be required to ensure that ground nesting birds are not negatively impacted. Where appropriate, measures to enhance biodiversity should be included within the proposed development. This should include native hedge planting and hedge trees along the boundaries and within the site, where appropriate.

A Flood Risk Assessment and a Drainage Impact Assessment would require to be carried out prior to the development of this site. We note that this area is potentially vulnerable to flooding. Dunning is designated a Potentially Vulnerable Area under the Flood Risk Management (Scotland) Act 2009. It is noted that within the adopted LDP site a Flood Risk Assessment is already a requirement of development – this should be kept as a requirement of the site (and the potential extension), and should consider all sources of flooding.

The site is steeply sloping (south to north) and so overland flows may affect the site during prolonged or intense periods of rainfall. The Council holds information regarding an issue affecting nearby residential properties in 'The Glebe'. This appeared to be the result of overland flow from the fields to the rear of the properties. This further highlights this risk. There is a field drain/cut-off drain along a field boundary at the south of the site. This may serve to provide some protection from overland flows. The required Flood Risk Assessment should therefore assess this risk. The risk from the Latch Burn should also be considered by the required Flood Risk Assessment as currently this is unknown.

Additionally a Drainage Impact Assessment should also be a requirement of the LDP site. The developer must demonstrate through this that the development would have a neutral impact (at worst) on the existing flood risk around the site. Site drainage will be required to consider any existing surface water issues at the site. It will be important to ensure the drainage is appropriate given the steep nature of the site.

Scottish Water has sufficient water capacity at Turret Water Treatment Works to service this development. The Dunning Waste Water Treatment Works has insufficient capacity to manage additional flows from this proposed development. However under current ministerial objectives, Scottish Water is funded for domestic growth at Waste Water Treatment Works. In addition, a Drainage Impact Assessment is required to establish what, if any network mitigation measures are required to support a development of this size in the Dunning catchment. Any drainage network upgrades identified as part of this assessment process will be funded and carried out by the developer.

Errol Airfield: The Errol Airfield proposal suggests extending the site considerably. The current site within the LDP1 settlement boundary has got permission for 240 units. This permission was first given in 2005 and there is a current planning application to extend this permission. It is questionable whether the site is effective. It has never been allocated as a housing site but was accommodated into the settlement boundary in LDP1. It is recommended not to extend the settlement boundary or

include any further land into the site. It is proposed that the settlement boundary is redrawn to reflect the current building groups for LDP2. Should the existing permission actually be taken forward and developed, the settlement boundary can be redrawn in the next plan period to reflect the new development.

Forgandenny: The settlement boundary in Forgandenny has already been drawn to allow for some infill development, for example along the south side of the B935 east of Kinnaird Place. As there is land already available within the settlement boundary there is no requirement to allocate further land that is currently outside the settlement boundary.

Invergowrie: The extension to the allocated employment area is recommended and the associated settlement boundary change.

Methven: It is recognised that Methven is one of a group of settlements that make up the Perth Core Area. They are identified as such because they have significant land and infrastructure capacity to accommodate future development. Methven is a sustainable place for significant further growth. The suggested site to the north of Strathview Place is elevated above the town in landscape terms and mitigation measures are unlikely to address the adverse impact of this. This site has previously been considered at LDP examination, where it was found to be unacceptably prominent on the hillside above the settlement. There are other options for development in the settlement. Importantly however development needs to be accommodated sensitively in the landscape and without prejudicing longer term options.

Perth Airport: There is an acknowledged need to review the long term strategy for Perth Airport. At present it is safeguarded for employment uses with an area designated for mixed use but a more holistic approach to Masterplanning the area is recommended in the next LDP.

Scone: H29 is a site that is already allocated in LDP1. The MIR was asking whether the site be extended not withdrawn altogether. As this settlement is part of the Perth Core Villages, the site is consistent with TAYplan strategy and therefore is recommended to be retained.

Pictonshill, Scone: There are housing sites at the Glebe School in Scone and at Scone North that are already allocated in the LDP1. The site at Pictonshill would be a significant and prominent addition to Scone, As there are other sites that are effective already allocated within the settlement, there is no requirement for further land during this plan period. It is therefore recommended that the suggested site not be included in the Proposed Plan.

Tibbermore: Not one of the group of settlements that make up the Perth Core Area, the proposed site is in the greenbelt, making it contrary to TAYplan and Local Development Plan policy. In terms of scale the suggested site is larger than the existing settlement and would have an unacceptable landscape impact.

Wolfhill: Site proposed at Wolfhill was assessed as a settlement boundary extension. Wolfhill is not within Perth Core and no facilities. It is therefore recommended that the settlement boundary does not change to accommodate further housing.

Question 14:

**Do you agree with the idea of enhancing the city centre streetscape? Yes/No
Please briefly tell us the reasons why**

KEY AGENCIES

Scottish Government are supportive of the provision made for active travel and consider that proposals for Perth reflect the hierarchy preference for more sustainable modes and consider that it is important that the same approach is taken throughout Perth and Kinross. **Transport Scotland** note that any reference to “Scottish Government’s Strategic Transport Projects” should be changed to “Transport Scotland’s Strategic Transport Projects Review and note their interest in discussions on any actions in the City Action Plan that have the potential to impact the strategic transport network and also others relating to walking, cycling and public transport. **SNH** are also supportive of the streetscape initiative, considering that the phased programme of enhancements should include the provision of a quality walkable environment with public greenspaces, and well signed access links to Perth Lade; recommend access and enhancement of the Lade should be a core part of this initiative; and request the opportunity to input into the draft non-statutory guidance.

OTHER COMMENTS

Responses were generally in favour of enhancing the city centre streetscape and greenspace and improving active travel connections. It is suggested by one respondent that the review should be more comprehensive.

On implementation there is some concern expressed by some about certain buildings/areas of the city they consider need attention, these include: the City Hall, St Andrews Church, North William St, and St Pauls. One respondent feels that opening up the Lade would lead to it becoming a dumping ground (due to experience of section between Caledonian Road and Crieff Road). Another respondent was concerned about the impact of Mill Street development and its impact on views to Kinnoull hill and wondered about the viability of another café quarter. Some commented that it was important to focus on the traditions and rich heritage of the city.

The King James V1 golf club makes a case for improvements to access to/from Moncreiffe Island, seeking ramp access by the existing access onto the island and also at Tay St. This they consider would have a wider public benefit by improving public access and would also support the 432 members of the golf course and the 71 allotment holders who currently have difficulty taking supplies and golf clubs onto the island. They do not support access at the southern end of the island due to safety for path users, but would support the lighting project which extends onto the island if this is linked with an improved safer environment. Another respondent also supports provision of additional pedestrian/cycle bridges over the Tay, and considers that some measures for active travel should be prioritised before the CTRL and considers that the Park and Ride sites should have good active travel links. This respondent also considers that the Council should not just identify potential but actively undertake design and feasibility work and establish possible funding sources, discuss with Sustrans/TACTRAN, and utilise previous work done for route on to North Inch from Quarry Mill. One respondent feels there is a need to enforce the Empty Buildings policies (if owners do not maintain property) in interests of health and safety before spending money on streetscape, and seeks measures to compulsory purchase accommodation.

COUNCIL RESPONSE

We welcome the supportive comments of Scottish Government and SNH and recognise the need to continue to work with Transport Scotland when bringing forward projects. The now finalised Perth City Plan sets out the Perth City Development Board’s aspirations and a framework for action by the public and private sector to grow the city of Perth and its economy. With regard to improvements to certain buildings and areas of the city, where the Council has ownership such as the City Hall, the

Council has full control, and can progress plans. This process has however been protracted, which reflects the challenges inherent in finding an alternative use for the building. The Council committee agreed on the 22nd of June to identify the building as a possible location for the development of a major new cultural attraction having completed the options appraisal which identified that such a facility could be located within the City Hall. On 16th August 2017 the Council approved plans to develop the former Perth City Hall as a new visual arts attraction for the city and recommended Mecanoo as the architectural firm to take designs forward. For privately owned property it is ultimately the private owner's responsibility, but the Council has an important role to assist and guide. There is a Vacant Property Development Officer, and an empty homes initiative, matchmaker scheme, and empty property fund, all of which are designed to help bring empty properties back into another use. Additionally the Council is currently planning and investing in streetscape projects to improve the amenity, such as the Mill Street project.

Proposals for active travel improvements are being brought forward with the Council currently undertaking design and feasibility work for the CTRLR and active travel improvements. It is acknowledged that there is benefit in having good active travel links to the Park and Rides. There is no current provision in the Council's capital budget for new crossings of the Tay. The Development Plan acknowledges links with the Perth City Plan in relation to the development and delivery of key sites, buildings and projects to support economic growth of the city and economy. The City Plan identifies options for potential access improvements to link the Moncreiffe Island and the north and south banks of the river with the city centre. These potential access improvements were also identified in the Bridgend Charrette as part of the local community's aspirations for investment in the area. Consultancy services have recently been procured to scope out and develop an appropriate cycle network plan and additional access improvements for the city of Perth and rural hinterland. The development of a masterplan will outline key cycle routes and supporting infrastructure, and complement previous investment, as well as assist future development of business cases for capital investment in active travel. The development of this masterplan will involve consultation with key interested parties. If resources are secured for investment in specific access improvements in and around the river and Moncreiffe Island, further formal consultation in due course separate from the Development Plan process.

Question 15:

Do you support enhancements to the Railway Station combined with an integrated bus and coach station (Map 6) ?

Yes/No

Please briefly tell us the reasons why.

KEY AGENCIES

Scottish Enterprise supports this initiative, which promotes sustainable modes of transport and encourages the use of public transport. In terms of delivery the following comments are made: Homes for Scotland support as long as costs are not sought from their members; SEPA support but would require a Drainage Impact Assessment; Network rail suggests proposal should be simplified to position of seeking bus drop off and pick up at the station in line with the Scotland Route Study Draft for Scotland December 2015 (requiring stabling and servicing facilities to be moved out of the station); Historic Scotland welcome their future involvement given the B listing of the station; SNH mention active travel connections between stations and the city centre; and TACTRAN mention active travel improvements to and from the stations in line with Scot Rail franchise and national objectives; someone suggested that this proposal along with relocation of Farquhar and Sons could secure improvements to the inner city ring as well.

OTHER COMMENTS

There is overwhelming support for this proposed enhancement to the Perth Railway Station combined with an integrated bus and coach station with only one respondent against. Benefits mentioned included breadth of economic, visitor, connectivity and sustainability/climate change benefits. Many consider improvements to timetables and integration of the services would be of benefit including a one ticket system for rail and bus, indeed the only no comment received suggested that this type of improvement was all that was required. Some considered that the proposal should go further and be developed into a strategic strategy for the whole of the region. In terms of delivery some suggested substantial and convenient car parking was required and reference was also made to short term waiting and taxi facilities.

The only no comment received suggested that current arrangements are adequate and that better timetable integration is all that is needed.

COUNCIL RESPONSE

We welcome the overwhelming support for this initiative and consider that it should be identified as a mixed use site in the Proposed Plan along with the Council's PH20 proposal as there is potential for shared access and parking arrangements. There are suitable developer requirements identified to guide it, including those highlighted in responses: need for drainage impact assessment, and recognising the B listing of the station.

Question 16:

Do you support expansion at Binn Eco Park (Map 7) within an agreed masterplan?

Yes/No

KEY AGENCIES

Scottish Water has no objection to the expansion.

Scottish Environmental Protection Agency support the concept of an eco-park, and the requirement for an agreed masterplan to inform future development. SEPA note that the disconnect between the heat and power demand and supply between activities current and proposed to operate at Binn Farm would not appear to accord with the concept of the Tay Eco-valley concept. The masterplan should show how to make use of heat and power generated on site, co-location of industries, and an integrated SuD system.

Scottish Natural Heritage supports the proposal but comments that it could result in adverse landscape effects and suggests mitigation in the form of appropriate native planting. SNH also draws attention to the adjacent Glen Wood AWI (LEPO) and nearby Turflundie Wood SAC/SSSI, which has a qualifying interest of great crested newt. A species protection plan would be required for this site. The development of sustainable drainage systems could provide wetland habitat for this species.

Historic Environment Scotland advise that the masterplan should take account of potential impact on the setting of the nationally important scheduled monuments of Balvaird Castle and Castle Law Fort.

Scottish Enterprise supports the approach set out by the Main Issues Report.

Scottish Government comments that this is in principle in keeping with SPP paragraphs 96 and 180; and that a detailed masterplan is required prior to planning application stage.

SUPPORT

The site owner and operator expresses conditional support for the expansion with minor amendments to the boundary proposed to accommodate minor and ancillary operations. The scope of the masterplan is submitted for discussion, to include future direction of operations relating to renewable energy and heat use; extensions to core waste services; related circular economy and clean technology initiatives; local food production plans; reassessment of traffic impact; and continued participation in the Tay Eco Valley programme. The benefits of local recycling and recovery operations to help meet proximity principles and secure local employment are set out. The additional allocation is required to secure the significant opportunity to locate new clean technology businesses using resources from discarded materials at the site.

Conditional support is expressed by Bridgend, Gannochy and Kinnoull Community Council subject to impact on nearby castle and control of odour; and by Auchterarder and District Community Council subject to the detail in the masterplan.

Two respondents support the expansion because it will provide employment. Another supports because it makes a positive contribution towards dealing with waste, climate change, and heat from waste issues

One other respondent opines that it is good to centralise services at one location.

Another respondent supports the provision of this facility away from dense residential population.

There were two further expressions of support without giving reasons.

OPPOSITION

Abernethy and District Community Council, and two other respondents opposed the approach set out by the Main Issues Report, suggesting that the masterplan for the proposal should be prepared, evaluated and approved prior to inclusion in the Local Development Plan.

One respondent went further to suggest that EIA scoping would have provided more detail on what should be included in the masterplan; and that a much more comprehensive approach is required including provisions for the site's eventual closure and restoration. More detailed information on extant planning consents; current restoration requirements; options for land areas for expansion; consideration of new and expanded uses; infrastructure requirements and environmental effects would have been helpful. In the absence of this it was not possible to set out a properly detailed response.

One respondent opposed the inappropriate scale of the expansion, seeking more public information. Concerns are raised over increase in vehicle movements and loss of agricultural land; lack of consideration of impacts on biodiversity or natural heritage; loss of amenity, scenic rural character; loss of public asset; potential for ground water pollution, noise pollution, adverse visual impact and impact on the area as a recreational destination with reference to viewpoints at Balvaird Castle, Castle Law, and Pitmedden Forest; issues relating to site access and road safety; and concerns about the presentation of the proposal as an Eco Park instead of as an overwhelmingly new industrial development next to a much smaller waste management facility that ought to be programmed for closure.

RSPB Scotland comment that should changes be proposed to the types of waste brought to the site then the number of birds at the site could increase, which should trigger a reassessment of the

impact of the wind farm on breeding Herring Gull and Lesser black-backed gull from the Forth Islands SPA and Inchmickery SSSI.

One response commented that the site is sited within the Ochil Hills Special Landscape Area. In terms of landscape impact, another respondent was opposed to expansion over to the Glentarkie side of the hill and the glen.

One comment received was conditionally opposed to the proposal if it would lead to burning up waste in the city. Points raised in other responses include: concerns about traffic impact including the enormous size of lorries and blocked roads; avoiding loss of agricultural land; industrial uses existing and proposed that would generate unacceptable noise and odour disturbing the surrounding area; availability of more suitable alternative sites; and loss of residential amenity at Glenfoot and Abernethy.

COUNCIL RESPONSE

No masterplan has been agreed in respect of this suggested expansion so the Council will not include it in the Proposed LDP. The policy framework of the Proposed Plan remains highly supportive of the types of operations proposed at the site, and the future direction chosen by the site operator. In particular the policy framework would support meeting Zero Waste and proximity principles; and would support the suggested co-location of clean technology businesses using discarded material as a resource. It is agreed that any masterplan will need to be prepared and consulted prior to the site's inclusion in the Local Development Plan.

The comments regarding adverse landscape, biodiversity, natural heritage, traffic, noise, odour impacts, impacts on scheduled monuments and potential mitigation measures should be taken into account by any future masterplan. Eventual closure and restoration of the landfill site and/or other areas of the site should also be considered through the masterplan.

Question 17:

If not, how and where should the Proposed Plan promote investment in the technologies and industries that will maximise the value of waste?

KEY AGENCIES

Scottish Environment Protection Agency suggests that the Plan should incorporate both the identification and safeguarding of existing waste management uses to allow for potential expansion; and improved policy coverage that supports technologies and industries that would maximise the value of waste that may come forward at locations throughout the plan area.

OTHER COMMENTS

One respondent commented on the need to minimise waste and the requirement for the plan to consider how it might be re-used.

Two respondents commented that other sites should be scoped and assessed, including the consideration of alternative technology and options that do not involve the development of agricultural land. Additionally points were raised by one of these respondents that it seems inappropriate to link the future of waste technologies and industries in Perth and Kinross to a single site.

COUNCIL RESPONSE

The Proposed Plan will retain the requirement for Supplementary Guidance on Delivering Zero Waste, in support of Policy EP9

Question 18:

Do you support the protection of land to facilitate opportunities to enhance train journey times to Edinburgh?

Yes/No

Please briefly tell us the reasons why

KEY AGENCIES

Tactran, Scottish Enterprise, Network Rail, SEPA, Historic Environment Scotland and Homes for Scotland all support the principle of the protection of land to facilitate opportunities to enhance the train journey times [from Perth] to Edinburgh.

Tactran state that this will support the Regional Transport Strategy 2015 - 2036 Refresh Objective 1.B Improving the efficiency, reliability and integration of the movement of goods and people, noting that Tactran continues to lobby Transport Scotland and the rail industry for this. Tactran seek clarification of the LDP position on the related proposal for a station at Oudenarde, as per the Oudenarde masterplan. The proposed LDP response refers to the need for joint agency working, which we agree/support, but it should be noted that PKC/Tactran/Fife Council and SEStran are currently jointly funding work which is investigating the potential for new/reopened stations at Oudenarde and Newburgh, which could potentially increase rail journey times.

Scottish Enterprise support this as it is considered that improving interconnections between main urban areas of Scotland will enhance economic development opportunities.

Network Rail representation refers to the Scotland Route Study Draft for Consultation December 2015, which sets out options for the rail network and its future investment. This also proposes the enhancement of the single line between Ladybank and Hilton Junction so is in line with the Councils proposals. Equally, protection of other land for future line improvements is seen as a key strategic requirement.

SEPA support the protection of land to facilitate opportunities to reduce journey times as it supports the development of sustainable transport options through Perth and Kinross area. However they state that railway improvements should be designed so that they do not increase the risk of flooding. The improvements would be cutting through the floodplain of the River Earn and so compensatory storage will be required and any culvert extensions designed to convey the same capacity as the existing culverts. SEPA recommend that contact is made with Flood Prevention colleagues regarding this issue.

Historic Environment Scotland supports the proposal but note that future rail track improvements should avoid and mitigate impacts on the historic environment assets in its vicinity. They state that this will be of particular importance regarding the scheduled monument Carey, Roman temporary camp and enclosure, (Index no. 9449) which is bisected by the existing track.

Scottish Government suggests that future reference to “Improved journey times to Edinburgh...” should specifically mention rail journeys to clarify that this specific issue relates to train travel not road or bus.

SUPPORT

It is suggested that and enhancements to public transport services should be supported. Two representations see more protection in order to facilitate an integrated strategy [for rail] for the whole of Perth and Kinross, including far more effective use of Gleneagles as a suburban as well as an inter-city station with another representation suggesting that thoughtful forward planning is always desirable and has been sadly lacking in the past. . While another suggest that a clear statement should be made about enhancing accessibility to Edinburgh from Kinross and Milnathort, and its neighbouring settlements, in order to truly be delivering the vision for the City Region outlined. It is also suggested that a new station at Abernethy should be considered as it would enhance transport options.

It is suggested that any initiative to improve public transport is welcomed and there is a general call for better rail facilities between Perth & Edinburgh. It is suggested that the journey time to Edinburgh is excessively high compared to other intercity journeys. Another representation suggests that whilst the service has improved it is not an expected city to city transfer with a second representation going on to suggest that it is quicker to journey to Edinburgh by car than by train which they do not believe should not be the case. The representation goes on to say that Perth should have a viable alternative to the car and that currently the Megabus is by far the quickest but if we are to become 'greener' we should have a faster rail service to our capital city.

Representations state that this has to be the correct step forward to provide the best opportunity for business, recreation and tourism and that effective means of travel to and from Edinburgh are essential for the continued economic growth of the area.

One representation states that rail journey times and the ability to increase train frequency is hampered by sections of single track both within the PKC area and farther afield. It is proposed that dual tracks should be considered as standard rather than the creation of short section passing loops as these are of limited benefit and would not allow significant reduction in either journey times or meaningful increases in train frequency.

OPPOSITION

One representation is opposed to his proposal stating that it is essential to encourage sustainable travel and enhance the marketability of Perth and surroundings and that park and ride services are essential to facilitate wider catchment.

COUNCIL RESPONSE

There is generally support for the protection of land to facilitate opportunities to enhance the train journey times from to Edinburgh. The Proposed Plan will include measures to protect this land. There is general support for encouraging sustainable travel which will be encouraged through policies which in the current LDP include PM1 and TA1. One comment suggests that instead of improving rail facilities we should be focusing on Park and Ride services however adequate provision for Park and Ride facilities is provided within the current plan with Park and Ride sites proposed at both Bertha Park and Kinfauns as well as this there is a current Park and Ride site in Scone.

Question 19:

Do you agree that the best location for a new cemetery is at Isla Road, Perth? Give reasons.

KEY AGENCIES

SNH do not support a new cemetery at Isla Road due to the loss of good quality agricultural land and detrimental impact on the greenbelt – they would support a new cemetery within the Perth West site. **SEPA** have concerns about all of the proposed cemetery options due to the lack of information available as groundwater tests have not been carried out but would review their position once investigations have been completed. **HES** emphasised the need for good design to limit the impact the cemetery would have on the Scone Palace Designed Garden and Landscape area.

SUPPORT

Those that supported a new cemetery at Isla Road agreed that it was a good location, with good access and would have minimal impact on surrounding residential areas. Support would have been greater if there was further information on how the increased traffic generated by the cemetery would be managed. There was also a suggestion to have an eco-cemetery with the option of woodland burials, similar to that in Comrie.

OPPOSITION

Those who did not support this location were mainly concerned about the current congestion and pollution levels in this area and the increased traffic generated along the busy roads from those visiting the cemetery. The Bridgend area is already an Air Quality Management Area (AQMA) and congestion is increased when there are large events on at Scone Palace and Perth Racecourse. There are also some concerns over site access and road safety with the suggestion of a proposed roundabout to alleviate these issues. Concerns were also raised about the poor provision of public transport for getting to and from the proposed cemetery.

Support for Perth West: Two representations were made which preferred a new cemetery to be located within Perth West as it would provide an area of open space with amenity value as opposed to impinging on the existing greenbelt at Isla Road.

COUNCIL RESPONSE

At the MIR stage Isla Road was the preferred option for a new cemetery to serve Perth, Scone and the surrounding towns and villages. Planning policy would have supported a cemetery in the greenbelt due to it being classed as essential infrastructure for the area; a cemetery is categorised as functional open space so therefore the impact on the greenbelt at Isla Road would have been minimal.

In response to **SEPA**, we will not proceed with the allocation of a cemetery site until groundwater investigations have been carried out, that will be the next step in the process and Community Greenspace will be responsible for this. Scone Estates (landowner) have been willing to engage with the Council to consider the site further.

With regards to the congestion concerns, restrictions could be imposed to ensure that large funeral parties are unlikely to be held during peak times when congestion is at its worse and arrangements would need to be made to take into account the increased traffic generated when large events are held at Perth Racecourse and Scone Palace – discussions would be progressed with Transport Planning with regards to this and the options available (potential roundabout). However it is likely

that the CTRL will be completed and in use before a new cemetery is operational so issues of congestion will likely be less significant. The proposal of incorporating part of a new cemetery site for woodland burials can be explored further at the detailed site investigations stage.

With regards to the support for Perth West, areas of search have been identified for both sites (Isla Road, Perth West) which will enable further investigations to take place for site suitability.

Question 20:

Do you agree with the preferred option for Perth West (Map 12) to allocate a wider area here?

Yes/No

Please briefly tell us the reasons why, particularly if you think the alternative option of continuing the existing LDP Perth West allocation, and identifying a separate allocation/or leaving the former auction mart within the settlement envelope as white land should be pursued.

KEY AGENCIES

The key agencies that have responded, namely: RSBP, Tactran, Scottish Enterprise, Historic Environment Scotland, the Scottish Environment Protection Agency, Sportscotland, Scottish Water and Scottish Natural Heritage all offer no objection to the principle of the preferred option of supporting the wider Perth West site in LDP2. They do however offer some detailed comments and sometimes offer their support subject to certain provisions/requirements.

Scottish Water notes that some manner of network mitigation for water and/or waste water will ultimately be required and they are undertaking a strategic study to support this and other associated development. Tactran support as long as a suitable access strategy can be achieved whilst Transport Scotland pick up on reference in supporting text to Transport Scotland spacing requirements which they consider should refer to trunk road or DMRB requirements as it is not specifically a Transport Scotland request. Network Rail comment that it has potential to increase pressure on the use of Perth station and this increased use should be mitigated by financial contribution towards rail infrastructure and consider that timing of a bridge across the Highland Mainline does raise the issue that safety on and within the line should be addressed as part of detailed studies. Scottish Enterprise supports the preferred option as long as the Council is satisfied and has sufficient certainty on its viability and delivery.

SNH offer conditional support for the preferred option as they consider it could deliver wider public benefits such as green infrastructure, integration into the landscape, active travel links and habitat enhancement or mitigation, if:

The Proposed Plan includes the Strategic Development Framework for West/North West Perth and is linked through green networks with the other West North West allocations and with the City centre SNH seek certain additional developer requirements which cover:

- green corridor/wider network connection to Almond Valley and Berthapark
- securement of the pedestrian/cycleway provision over the A9 near Newhouse farm
- SUDs

SNH also seek amendment of existing developer requirements to:

- amend the requirement for blue –green network to specify active travel network through it, and width and function of this network
- amend the landscape/open space requirements 2nd bullet to include “an appropriate planting scheme which will also link into green networks” and the 4th bullet to refer to “native planting”

SNH also:

- note that the access point at Lamberkin woodland is noted in the ancient woodland inventory and that the masterplan should avoid loss or fragmentation of this
- seek the proposed underpass access point to be moved to the south to avoid the green/blue corridor
- seek amendment to the map references to refer to existing woodland and new native woodland

SEPA require a developer requirement that requires a sewer connection. SEPA also recommend a requirement to commit to minimising soil sealing, and to amend the reference to the green/blue network to green network because the scouring burn begins outwith the site, and to the multifunctional nature of this to ensure active travel links to Perth are maximised.

Historic Environment Scotland welcomes the preparation of a conservation plan and considers the A9 access proposed should be considered in the context of the recommendations of this plan. They raised an objection to the Almond Valley application which concerns its impact on the setting of the scheduled monument Huntingtower Cairn and this concerns the area now proposed to be enclosed within Perth West. They request that an appropriate developer requirement is included to address this issue.

RSPB support as long as it proposes extensive open space and enhances the biodiversity value of the site, and they welcome the requirements for landscape framework and greenspace network management plan and construction method statement.

Sportscotland notes the intention for sports facilities to be shared resources for community and school(s) and strongly encourages provision of sports facilities in line with our School Sport guidance. This guidance sets out recommended provision for indoor and outdoor sports facilities to meet curricular needs, and design guidance to facilitate community use.

OTHER COMMENTS

A few supportive comments are made, and their remarks include that: the plan is well conceived; it should be supported if developers deliver a really good addition to the western edge; it is sensible to allow for long term planning; it recognises natural and man-made boundaries of the site; whilst Bridgend Gannoch and Kinnoull Community Council consider it to be a suitable site with good access to a major road system. One respondent suggested that that the auction mart site should be identified for leisure not retail. The Montrose Society is also broadly supportive of the proposal subject to further historical research and archaeological research being carried out to define the limits of the Battlefield. They consider this an opportunity to mark the Battlefield appropriately and interpret it at various places.

The John Dewar Lamberkin Trust (JDLT) as one of the major landowners supports the preferred option. They consider that this option will safeguard against potential delays in the delivery of other strategic sites whilst also enabling a strategic and co-ordinated approach to the delivery of key infrastructure and amenity provisions. They support a collaborative approach towards the delivery

of the project and affirm that they are working with all interested parties. They consider that delivery of the project will contribute towards: implementation of Broxden junction; implementation of the Tay Eco Valley initiative and exemplar initiatives around district heating; and a new cemetery site. They support the developer requirements listed in table 6 and consider them to be jointly deliverable, whilst the phasing strategy of the Masterplan Framework is also supported. An amendment is sought however to exclude land to south of the A9 from the green belt as shown in the Masterplan Framework as this will be needed to facilitate the delivery of long term trunk road improvements. In recognising the requirements of the Main Issues Report they note that the supplementary information requested will be provided late Spring/early Summer to cover key technical issues relating to traffic impact, forestry strategy, energy planning, delivery of service infrastructure and battlefield conservation.

Consistent with the charrette masterplan framework, JDLT seek the exclusion of land south of the A9 as shown in order to support the delivery of long term trunk road improvements. The exclusion of the land from the greenbelt and its inclusion within the Perth West masterplan would enable a co-ordinated approach to infrastructure delivery and land use management, consistent with the conclusions of the charrette masterplan framework of 2015. The strategic forestry plan for Lamberkin Wood (JDLT owned) is being reviewed and will include advanced planting in order to strengthen and maintain this woodland block. This forestry strategy, with its potential to open up public access consistent with greenbelt policy, is being incorporated into the Perth West project and supplemental information relating to the details of the strategic forestry plan will be submitted to Perth & Kinross Council during the early Summer 2017 to help inform the Proposed Plan.

There are not a substantial number of objections but there is a larger number of representations objecting to or raising concerns as opposed to directly supporting the preferred option. The majority of these representations are from other development interests in the HMA, and there are some from members of the public. Comments included:

- that the preferred option should be held as a reserve should other strategic sites not come forward as expected (with priority given to existing allocations);
- that that there should be a focus on smaller/medium sites instead which better meet the tests of effectiveness and do not rely on significant infrastructure or multiple landowners;
- that it is inappropriate and that there should be support for a wider distribution of effective sites across the HMA;
- that it is conditional on new transport infrastructure that is not currently planned;
- questioned if there is sufficient capacity in water and drainage infrastructure;
- that it will cause unacceptable traffic implications and air quality problems at West Huntingtower with associated quality of life and house price implications

The landowners of H70 prefer the alternative option as they say that they are attempting to bring forward a planning application and changes now could delay progress; and prejudice the delivery of existing sites. They also note that they do not support the phasing shown in the Perth West Masterplan Framework. The administrators of the former auction mart site also disagree with preferred option and seek a separate allocation for their land as a mixed use site (which they have marketed and received interest in). It is mentioned that this area was not included in the charrette process and it is suggested that site access and connectivity can be controlled through site specific requirements for separate allocations, and that the auction mart allocation could show active travel connections and connectivity with surrounding land.

An objection is also made on the behalf of the agricultural tenant of the farms of West and East-Mid Lamberkine. They wish to farm this land for the next generation and beyond. They suggest the western bypass is the clear boundary of the city and consider:

- that fundamentally it is not a suitable location for development in terms of the landscape setting of the city citing the Reporter concerns about the impact the grade separated junction on the A9 and suggests that the Council has not undertaken the necessary assessment or consultation on the visual impact of the site or its environmental acceptability;
- that a new site will just reduce confidence to invest in existing sites; that the large sites take a long time to come forward; that this site has particularly complex access issues; and
- if H70 does not have the critical mass to create a sustainable community then it should be removed from the LDP;
- that there is much still to be resolved in terms of access, drainage, cooperation between landowners, and phasing and delivery with a lack of certainty on these key principles and its viability.

COUNCIL RESPONSE

On housing land supply: there are comments suggesting that a wider Perth West site is not required and should be held as a reserve. The LDP considers the risk of relying heavily on the delivery of the strategic development sites (including Oudenarde) to maintain a 5 year effective housing land supply. Should progress on two or more of these sites slow significantly or even stall then there may not be sufficient alternatives within the current housing land supply to compensate for this. There is no suggestion that any of the strategic development sites should be removed from the next LDP. The potential inclusion of a wider Perth West site in LDP2 is about building in greater resilience in the supply of housing land.

Significant work has been done to date on a wider Perth West site through the charrette and masterplanning process and this is ongoing. The majority of the area is white land and is within the settlement boundary. In light of all this it therefore is reasonable to expect that a planning application will be forthcoming even if the full site is not allocated in LDP2. Also in response to the landowners of H70 who prefer just the current H70 allocation at Perth West, this does not have the critical mass to create a sustainable community. The charrette and work to prepare a Masterplan Framework for Perth West supported confirmation of a larger more sustainable site in the LDP.

On infrastructure implications: The Perth Transport Futures Project was developed to give greater priority to bus and active travel, to help ensure we do not exacerbate air quality problems within the Air Quality Management Area, and to ensure there will be sufficient capacity in the transport network to accommodate the future developments identified in the LDP. It is an integrated package of measures incorporating the Cross Tay Link Road and is supported by a package of City Enhancements to improve the wider public transport, walking and cycling networks and "lock-in" the benefits of the CTRL. The project is based on the future traffic movements associated with the current LDP allocations and identifies the need for an integrated approach to address the transport problems. Recently, to consider the implications of a wider Perth West, further traffic modelling work has been undertaken to assess the implications of the wider Perth West site based on its Masterplan Framework and access strategy.

When carrying out this update to the modelling the traffic solutions comprised: the CTRL, A9/A85 junction improvements, and full Inveralmond and Broxden roundabout improvements. If signal optimisation at the Inveralmond and Broxden roundabouts is included, then the modelling work indicates that the wider Perth West site could potentially cope with somewhere between 1,500 and 2,500 new houses before further physical / modal measure may be required. There may also be

implications for the city centre operation as whole. Further modelling work undertaken by the landowners suggests that this may not be a threshold however it is considered prudent to identify a threshold of 1,500 homes, and associated uses at Perth West, with a pause at this point for monitoring before the rest of the wider site can potentially come forward. This acknowledges the certainty we have over the initial phases of Perth West, and offers a suitable critical mass for sustainable communities and for development viability. If there are transport/traffic challenges beyond communities of 1,500 homes these could potentially be addressed by further physical/modal measures so it is appropriate to identify this pause and reflect monitoring.

Detailed matters in relation to traffic implications and air quality will also be suitably addressed through future planning application masterplan/s for the site as Transport Assessment(s) and future modelling studies will determine network and local junction capacity, when the strategic junctions will be required, and when the connection from the A9 to the A85 is required.

There is concern about the Council's reliance on these larger sites which rely on multiple landowners. Nevertheless it is important that we focus the long term growth of Perth along the new and improved transport network and clustered round a series of new or expanded schools. With the vast majority of schools, in the Perth area, being at or near capacity it was evident that a significant capital programme would be required to support growth. A range of developers and landowners advocated relatively small scale expansion of the villages surrounding the City. Whilst contrary to the Strategic Development Plan spatial strategy a scatter gun approach to development is also not sustainable from a financial standpoint. Such an approach would require the expansion or replacement of a large number of primary schools at considerable expense but delivering limited growth potential. The preferred and more viable approach is to concentrate development in a few locations and at a scale which justified a new build school or the extension of an existing school. This entails working with larger sites in Perth which rely on multiple landowners.

The key to addressing any potential issues around deliverability of these large sites is to ensure landowners work together in their masterplanning, and that we keep on top of their progress. The Council is moving toward requiring developer delivery strategies. These 'Delivery Strategies' would identify how the development will be implemented, the programme, any matters to be resolved such as land assembly and preparation, infrastructure requirements and delivery, development phasing and the likely need for development contributions. The identification of key milestones would allow the Council to assess whether the timetable is on track and the reasons for any slippage. Failure to produce a Delivery Strategy, or significant slippage (depending on the reason) in the programme, may result in either the site being proposed for removal from a subsequent Plan or a decision by the Council to progress the acquisition of the site, through compulsory purchase legislation, for subsequent development by the Council and/or an alternative private developer. This approach seeks to address the potential weaknesses of dealing with large multi landowner sites.

On the suitability of the location of the grade separated junction on the A9: this was considered through the charrette and Masterplan Framework for Perth West, and then in SEA of the LDP MIR. Transport Scotland has been fully consulted and the junction position is also to meet their requirements. This is considered to be a suitable and acceptable location but there are landscape and visual sensitivities to the development of this site that will need to be addressed in the detailed masterplanning and design and layout of this site. There is a need to soften the western urban edge of Perth and create a new outer western edge which links shelterbelts and woodlands, and incorporates new tree planting, providing a transition between town and country (and this will be secured through the developer requirement). It is recognised that if a larger Perth West boundary and change to the Green Belt boundary is to be supported in the Proposed Plan, there is a need to ensure that there is advanced planting along boundaries and key views. This should be as soon as practical to ensure a robust and more useable woodland structure is retained/created at West Lamberkine Wood and extending north of West Lamberkine Wood.

On deliverability: concerns about the length of time, complexity, and issues still to be fully resolved are accepted, but it is a good proposal from a Strategic Environment Assessment (suitability) and economic (viability) perspective. Any development of this scale encounters similar issues, and these are worked through in their masterplanning and detailed planning applications. There is enough certainty on the key principles, as these were established through the charrette and Masterplan Framework and in the landowner's delivery statement and a detailed access strategy which were provided after being requested in the MIR, and in the Council's traffic modelling work to support the case for inclusion of the site in the Proposed Plan as suggested. The majority of the landowners for Perth West (excluding for the moment the H70, the former auction mart site, and the small area that lies within H73) are working together and have a landowner agreement in place. Together this gives us sufficient confidence on deliverability of a phase of 1,500 homes and associated uses at Perth West.

Summary of reasons why we support this allocation:

- Need for flexibility in housing land supply due to reliance on large sites which could stall or slow, and creates healthy competition
- Need to support a sustainable development at Perth West (critical mass to create a sustainable community)
- Proposals for smaller scale proposals outwith the city are contrary to the Strategic Development Plan spatial strategy and a scatter gun approach to development is also not sustainable from a financial standpoint
- The SEA for this site shows that the site is suitable and the charrette provided engagement on the access strategy and the extent of the site/ greenbelt boundary change
- It is considered prudent to plan for the longer term, and the costs of providing infrastructure mean it needs to be supported by large scale development

Response to concerns about the detail of this proposal

SNH suggest some amendments to the developer requirements for Perth West. These are mostly in line with the Perth West Masterplan Framework produced and there is merit in clarifying and making these requirements explicit in the LDP so they have statutory weight.

SNH consider that the A9 access junction into Perth West should avoid loss of Ancient Woodland at Lamberkine, which falls within the Inventory. Transport Scotland's standards for junction spacing requirements require this junction to be a certain distance from the Broxden roundabout and this means the junction needs to be in the vicinity of this woodland. For landscape, visual and economic reasons, it would be inappropriate to locate a new A9 junction further out to the west of Lamberkine woodland (uncontained within the landscape). The proposed junction location is primarily outwith and to the east of existing Lamberkine woodland but junction design requirements mean that through the detailed design process some felling within Lamberkine wood is required. Ancient Woodland located to the south of the A9 could therefore be affected, albeit consistent with SNH's guidance on the Inventory, the exact location of ancient woodland requires detailed surveys. It is the case that the approved strategic forestry plan for the estate entails felling and replanting at Lamberkine. The requirement should be to avoid such loss but where inevitable for road infrastructure, for this to be limited through an integrated approach to detailed woodland surveys and design, in consultation with SNH and the Forestry Commission. Any loss should be compensated through a combination of measures including extending native planting to the north and south and by facilitating wider public amenity use of the woodland (thus ensuring it achieves the significant net public benefit required by Scottish Government's Policy on Control of Woodland Removal).

SNH also request that the underpass access point be moved south to avoid the green/blue corridor. The reasons for this are understood and accepted.

Most of SEPA's requirements which are all matters of clarification, or explain existing policy commitments are supported, however it is considered that because connection to public sewerage is an obvious policy requirement it does not need to be reiterated.

Historic Environment Scotland seek an additional developer requirement to protect the setting of the scheduled monument Huntingtower Cairn. In response it is proposed that the existing developer requirement for Mains of Huntingtower and Huntingtower Castle should be augmented to include the cairn.

Comments from RSPB regarding open space and biodiversity, and from SportsScotland noting the intention for sports facilities to be shared resources for community and schools are noted. Comments from Historic Environmental Scotland and the Montrose Society with regard to the battlefield and the need to prepare a conservation plan for this to inform the future masterplanning of the site are noted and are reflected in the recommended Proposed LDP developer requirement.

With regard to the request by JDLT to exclude land to south of the A9 from the greenbelt in order to support the delivery of the junction this is recommended as it is considered to be a logical boundary following the line of the woodland.

Question 21:

Do you agree with the preferred option for land north of Burghmuir Reservoir (Map 13) ?

Yes/No

Please briefly tell us the reasons why

KEY AGENCIES

SEPA within the issues relevant to their remit support the preferred option. SNH consider that the LDP lacks an Open Space audit and strategy which would provide an evidence base for justifying retention or de-allocation of this site and this should be carried out to inform the best use of this land.

Scottish Water owns the site and considers that there would need to be appropriate mitigation measures before and after development to protect its assets including suitable standoff distances. Scottish Water considers that for the following reasons the site merits formal allocation as a housing site and they intend to submit a planning application in principle so these criteria can be considered further:

- it has no recognised landscape character and it not accessible and has never been used for a recreational, social or community function and is back land which is not visible from public roads so therefore has no benefit to the general public;
- it would be beneficial to reuse this underused resource;
- it is an effective housing site;
- whilst vehicular access from Muirend Road is constrained there is scope for an access from Viewlands Road West by forming a new entrance in the south west corner of the site (which has suitable visibility, and can provide suitable width);
- of a wider community benefit an access from Muirend Road would be retained for pedestrian purposes providing an access which does not exist presently and reducing

walking distance between Muirend Road and Viewlands Road West. There is also opportunity to connect pedestrian access from the existing track into the Burghmuir recreation area;

- the site is well connected to bus routes;
- the reservoirs are a benign neighbouring use as they are covered and behind embankments with no noise generated and security between the site and reservoir could be enhanced
- the site is discrete, well screened and would have little visual impact; and
- they have submitted a design and layout for 27 homes to show how the site could be developed whilst some communal amenity land is provided, and ensuring appropriate privacy and amenity for existing residents.

OTHER COMMENTS

There are a couple of generally supportive or neutral responses to the preferred option whilst there is also a suggestion that the Council should consider car free or electric/hybrid car only sites and that there is a need for more charging points and maybe a small park and ride here.

The balance of the comments either objects to the preferred option of removing the open space allocation or to its potential development for housing. The concerns/issues mentioned included the following:

- that there is no viable access to the site and the access from Muirend road is not suitable for 2 way traffic
- impact on privacy/daylight/sunlight for existing residents
- proximity to the reservoir/health and safety and amenity concerns due to 24 hour access and light and noise nuisance
- exposed hill top location
- that there is sufficient housing available
- that there is water main infrastructure for Perth under the service track
- land is intended or should be used for grazing/has been used successfully for grazing over the years
- that there have been historical problems of flooding due to drainage issues in the field, and towards the lower corner at the track onto Muirend Road
- that existing green spaces are important for air quality
- amenity quality could be improved and that it could be reallocated as public open space

Alternative uses proposed included:

- Grazing
- Public open space/community woodland (the Council supported community woodland at BATTERYBANK, Coupar Angus and there are various sources of funding available, and it is suggested that Perth and Kinross tree warden network may take a lead)

COUNCIL RESPONSE

The site is of limited agricultural value, and it is not prime agricultural land so its use/potential use for grazing is not significant in planning terms. This is private land and has never been publically used or accessed. It is not visible from public roads. It is not considered to offer wider public benefit and if housing were to be accepted the proposal is to improve pedestrian permeability through the area with a link from Viewlands Road South to Muirend Road, and to increase accessibility to Burghmuir Park. The proposed identification of this land for public open space/community woodland is not supported by: the current use/amenity of the site; the plentiful existing open space available elsewhere in the area notably within Muirend Park; or by future maintenance resource commitment that would be required. It is therefore considered that the site cannot be identified as public open

space. This means that should an acceptable proposal be prepared it could be supported by the Development Plan.

Question 22:

Do you agree with the preferred option for Perth Quarry (Map 14) ?

Yes/No

Please briefly tell us the reasons why

KEY AGENCIES

None of the key agencies have objected to the preferred option however SNH recommends a reconsideration of the option (to address landscape impacts and woodland restoration), and some other potential odour/nuisance issues are raised by SEPA, whilst drainage issues would need careful consideration through the planning process.

SEPA recommends that the Council considers the potential noise and odour issues and compatibility with existing regulated activity. SEPA mention odour complaints have been received from nearby properties. SEPA also draw attention to history of runoff from the site affecting neighbouring roads and properties (suggesting that development should try to mitigate current flooding issues). PKC flood team mention that whilst DIA has been indicated further investigation will be required to determine the source of this problem and how/if it can be accommodated through the drainage design of the site.

SNH recommend re-consideration of this option to address landscape impacts and woodland restoration, and seek clarification of the terms of the long term restoration plan post working. They note that the quarry site is sunk within the wooded ridge enclosing Perth. This is seen from within the town and from many travelling receptors (including Friarton bridge). SNH consider it likely that housing or recreational development (eg ski slope) would generate adverse visual and landscape effects on the landscape setting of Perth and the Landscape Character area of the Lowland Hills LCA. Prior to development the southern half of the site was an Ancient Woodland Inventory site. SNH recommend reinstatement of native woodland in the southern half of the site to restore habitat connectivity between the west and northern woodland and help integrate it into the wider landscape. SNH recommend reconsidering the types of development suitable for this site to avoid landscape and visual impacts and reinstatement of woodland to the south. SNH state development should be subject to criteria for mitigation/avoidance of landscape and visual impact.

Scottish Water has no objection noting that there is sufficient capacity within the Water and Wastewater Treatment works for such development. Tactran supports the preferred option and the developer requirement regarding pedestrian cycle links within and to adjoining areas. RSPB also supports the preferred option provided much of the remainder of the site is restored to valuable habitat contributing to UK BAP and welcomes the corresponding developer requirement.

OTHER COMMENTS

There are some supportive or neutral comments made which raise the following points:

- It is desirable if high quality leisure facilities can be provided (and the restriction for housing to cover no more than a third of the site is retained);
- It could add considerably to Perth's attraction as an outdoor base from which to plan an active holiday;
- consideration should be made to local opinion; and

- could it be used for woodland burials?

The landowner Tarmac agrees with the preferred option for Perth Quarry as the allocation would contribute to the supply of housing land and deliver an increase in leisure amenities. Tarmac has submitted alongside their representations: a transport technical note to highlight the sustainable location of the proposed allocation; an outline flood risk assessment; a landscape and visual impact assessment with an indicative site masterplan and sections; a geo technical note; and a utilities assessment.

There is a handful but not a substantial number of comments objecting to this preferred option. A couple of these are from other development interests within the housing market area, and there are also a few from members of the public. These comments encompass the following points:

- that it is inappropriate, and that there should be a focus on smaller/medium sites instead which better meet the tests of effectiveness and do not rely on significant infrastructure or multiple landowners
- concern about the possible impact on their home and on trees and habitat
- considers this to be no better than existing plan

COUNCIL RESPONSE

In response to the concerns of other developer interests, the addition of this site to the housing land supply would provide a medium sized site which is not reliant on significant infrastructure or on multiple landowners, and could provide some additional flexibility to the housing land supply.

In response to the general public's concerns this proposal will deliver wider public benefits by way of recreational facilities/employment uses, will not significantly impact on existing residential areas nearby, and will improve the habitat. The allocation requires a robust landscape framework maximising the potential to enhance biodiversity and protection of habitats. A landscape framework and habitat improvements would guide any detailed proposal that comes forward.

Regarding SNH's comments about the southern half of this site, this was identified for leisure/recreation in the MIR, and further examination of this proposal may show that a ski slope (over which use SNH have some concern about potential visual impact) is unviable given the Council's reluctance/hesitancy to take on maintenance responsibility for this type of facility. The landowner has prepared a landscape and visual appraisal (LVIA) to support the broad consideration of potential landscape and visual impacts which may arise. This assessment notes that maturing broadleaf and coniferous woodland borders the quarry, with blocks of woodland to the west, north east and south east. To the south, there is a smaller boundary of trees, but the topography helps limit views from the south. The proposed Activity Park should reinforce the strong planted features which currently screen the quarry and should help blend this area into the existing retained vegetation.

The possible uses proposed for this part of the site, recreational (rock climbing, biking, and walking trials) alongside native planting are considered broadly compatible. Proposed developer requirements for a robust landscape framework maximising the potential to enhance biodiversity and protection of habitats; and for an appropriate design and layout of development ensuring appropriate amenity for residential areas addressing design issues in relation to levels helps clarify the sensitivities and requirements. The landowner's LVIA considers that the surrounding mature trees conceal the quarry within the landscape, both from close by or viewing the site from receptors further afield. However for further clarity the site allocation shows the rough area to be enhanced as a nature/leisure and recreational area. It is required that a masterplan is prepared for the site to

ensure provision of a more detailed framework and to ensure delivery of a sensitive and high quality development along with the leisure and recreational benefits.

In response to comments from our flood team and SEPA further information was submitted by Tarmac which has satisfied our flood team that an acceptable solution can be achieved. The landowner's proposed pond within the park will likely have a beneficial effect on drainage across the site by helping to alleviate any existing drainage issues present but this will be fully assessed through detailed assessments at the planning application stage.

On further points of detail relating to the site developer requirement and based on the developers geo technical study work, it is considered that the following should be added to the requirements, "Suitable restoration of the land with a geo-environmental audit to determine the level of contamination and remediation requirements for areas of potential contamination". Also the existing requirement "Assessment to show ground conditions are suitable for residential development" should now be augmented to add requirement for an assessment of quarry wall stability and geometry, and strength of the rock mass.

Question 23:

Do you agree with the preferred option for Scone H29 (Map 15)?

Yes/No

Please briefly tell us the reasons why

See response below.

Question 24:

If you think the alternative option to keep the existing H29 allocation should be pursued please briefly indicate your reason.

KEY AGENCIES

SNH do not support the preferred option H29 as they consider that this will result in the loss of woodland listed on the Ancient Woodland Inventory (AWI) and impact woodland habitat connectivity. However they would support this option if specific developer requirements are included.

Scottish Water notes there is sufficient capacity in WTW and WWTW but network upgrades to water and or wastewater assets will be required, whilst a water and DIA is likely to be required.

Historic Scotland considers that a further encroachment of development within the grounds of Scone Palace is likely to have an adverse effect on the designed landscape. However, they are content that this can be mitigated to affordability, an acceptable degree through sensitive design, layout and landscaping. They therefore request that they are consulted on proposals within this area as they develop.

SEPA recommend that a requirement for a Drainage Impact Assessment to be undertaken is added to the site specific development requirements attached to allocation H29 in the adopted local development plan as a surface water hazard has been identified at this site. They recommend that the planning department take the issue forward through discussion with their flood prevention and roads department colleagues and Scottish Water, where relevant.

SUPPORT

Two responses supported the proposal. One suggests that it provided an opportunity for woodland burials. The other response consider the proposal to be acceptable provided that technical and engineering due diligence supported the development.

OPPOSTION

This question has had a considerable number of objections to the proposal to change the H29 boundary. The following issues were raised:

1. A considerable number of respondents are concerned with growing congestion in the area around Scone. One respondent stated that "traffic volumes and further house building along the A94 will merely serve to exacerbate this problem". There were also concerns about the safety of children crossing roads on their way to school.
2. Access to the site was raised as a concern. The road from Old Scone is considered to be very constrained and steep and not suitable for heavy vehicles.
3. It was considered by a number of respondents that there should be no more development until the CTRLR has been committed and underway in order to alleviate these problems. It was stated by some respondents that the considered the existing roads around Scone to be unable to cope with any further traffic.
4. A small number of respondents felt that there were other villages within the Perth area more appropriate for development. They felt that to allow even more development in Scone had the potential to "ruin what was once a beautiful historic village". It was considered that the 300 houses in Balgarvie has already had a huge impact on the village.
5. A large number of respondents are concerned that the proposed development would further exacerbate loss of ancient woodland. One respondent noted the tree preservation order on the Douglas fir at the end of Stormont Road and Harper Way.
6. The loss of habitat was considered by a number of respondents to have a damaging impact on rare species, in particular red squirrels that respondents believed to live in the area.
7. There were some concerns raised about a lack of open space within Scone and concerns that there would be even more pressure on existing parks if there was a large increase in population.
8. Some respondents were concerned that there would be a detrimental impact on people's health and well-being.
9. Concerns were raised about the visual impact on the landscape and that Scone would look overdeveloped. It was raised that Scone would become a commuter village and a suburb of Perth.
10. Representatives questioned whether the housing would be affordable and who would actually be likely to buy the new units.
11. It has been raised that the embargo that was implemented to prevent further houses in Scone was unfairly used to prevent a small number of units being built and now the 100 units proposed is completely contrary to Council policy.
12. Respondents consider there to be drainage issues within the site which could have a wider impact on Scone.
13. There were concerns that there would be a loss of amenity for residents and overloading of facilities such school, doctors etc. One respondent stated that "Scone amenities cannot cope with further development; nothing was upgraded after the last mass development at Balgarvie so everything is already at capacity".
14. Many respondents were keen for the Green Belt to be retained and for there to be no further development within the area.

15. A number of respondents questioned how the Scone proposal H29 was added to the LDP/MIR despite the residents of Scone overwhelmingly objecting to it in 2007. It was stated that residents of Scone have never been in favour of either the preferred option or alternative option for Map H29. It was also noted that despite several questionnaires over the last 15 years that unanimously rejected such proposals, the respondent felt that the Council have continued to attempt to enforce unwanted and unjustifiable development on the community.
16. There were concerns that this proposal was simply to help the developers.
17. A number of respondents noted that the delivery of large scale strategic allocations is hampered by constraints such as ownership and infrastructure etc. They felt that these constraints are less prevalent on smaller sites in single ownership. It was therefore suggested that the focus should be placed on the allocation of small/medium sized sites which can demonstrate compliance with the various test of effectiveness set out within the PAN.
18. A number of respondents considered that Perth has a surplus in housing until 2028 and has no legal requirement to build at Scone or anywhere else within the city in excess of the Housing Land Requirement.
19. One respondent raised concern regarding accidents near Barton Aerodrome and Blackbush. Should not develop near airport

OTHER

One respondent had no real objection to the proposal but considered that greater weight should be given to local opinion.

COUNCIL RESPONSE

In terms of the responses regarding the actual site, the Council notes these objections. Nonetheless, the specific question regarding this site was whether to extend the site or to keep it as it is in the adopted Local Plan. Many of the objections tackle the site as a whole and are raising issues that have been discussed during the adoption of the site. Local issues regarding congestion, access, the CTRL, the location, loss of ancient woodland, drainage, open space, affordable housing, visual impact, impact on local amenities and biodiversity are all issues that were raised during the previous consultation.

The site was submitted in the call for sites submission in 2009 for the new LDP. Having been site assessed through the Strategic Environmental Assessment process, the site was then proposed through the Main Issues Report (MIR) in 2010. The site assessment process looks at a range of issues which include the local infrastructure capacity and consultation was undertaken with NHS Tayside, Community Greenspace, SportScotland, Education and Children Services amongst others. It is acknowledged that the primary school at Scone is a constraint but there were a number of alternative strategies identified that could resolve this issue.

Whilst objections were raised regarding the site, it was considered to meet the required environmental and housing needs requirements once compared with the full range of sites within the Perth & Kinross Council area. The process of choosing sites is not based simply on the amount of objections, but the validity of the planning objections that have been raised and whether these constraints can be mitigated through design. As a result of these wide ranging factors, the site was put forward in the Proposed Plan in 2012 with an embargo stating a requirement for the Cross Tay Link Road to be built prior to any development taking place on the site. A&J Stephens objected to this embargo during the consultation on the Proposed Plan.

The Proposed Plan was then taken to Examination. At this point, the Council considered the issue of both taking out the site and easing the embargo. The Scottish Government Reporter, having

assessed all the available information regarding the site, decided to lift the embargo and allow 100 units to be developed before the building of the Cross Tay Link Road. The report is largely binding on planning authorities, meaning that they may only depart from the recommendations if there are exceptional circumstances. This site is therefore adopted within the Local Development Plan and pre-application discussions and consultations have taken place with the developer of this site.

The proposed change to the adopted boundary of the site is considered by SNH to impact on woodland connectivity and loss of habitat. Although the proposal was made in order to support greater woodland connectivity and provide easier access to the larger site, the additional area is not fundamental to the development of this site and therefore the alternative option to retain the adopted site boundary is recommended.

Question 25:

Do you agree that the preferred option for meeting the housing land shortfall in the Greater Dundee HMA is the identification of an additional site in Longforgan (Map 17)?

Yes/No

Please briefly tell us the reasons why, particularly if you prefer the alternative option of allocating additional land at Inchtore (Map 18)

KEY AGENCIES

Historic Environment Scotland: State that they have no comments to offer on the sites in Longforgan and Inchtore other than welcoming the recognition within the developer requirements for Longforgan West to consider the setting of the listed building in the vicinity.

RSPB had no comment but welcomed the requirements to enhance biodiversity.

Council Flood Team: state that the Longforgan site will require a Drainage Impact Assessment.

SUPPORT

A number of respondents agreed with the preferred option for the following reasons:

- Some respondents felt the village of Inchtore had very recently undergone a significant expansion and local facilities such as the school are now very busy.
- One respondent stated that the proposed housing is for the Dundee housing market area, yet they noted that it is Dundee and Perth Council's stated policy not to provide secondary schooling for children from Inchtore in the western part of Dundee.
- There were concerns that the Inchtore option represented another expansion of the village boundary.
- Some residents noted that the area at Inchtore is frequently waterlogged and will see housing encroaching on a pond and small wooded area which has established wildlife present.
- There were concerns raised regarding the traffic within Inchtore.
- Several respondents felt that the proposal at Longforgan had more potential to form a coherent settlement structure and positive landscape fit within the well bounded field pattern. They also considered it more viable in terms of infrastructure.

OPPOSITION

There are a number of concerns regarding the preferred option:

- The residents consider that Longforgan that has changed beyond all recognition and building work over the past 15 years has ruined the peaceful setting. They feel that any more houses will just make things worse.
- They consider there to be no requirement for further housing as there are a number of houses already for sale within Longforgan.
- They believe that the proposal will result in more traffic passing the school which they consider to be a very busy road with cars and lorries traveling to the potato farm on Moncur road.
- They consider the school is currently at full capacity and feel more homes will only increase demand.
- They feel that the area is at risk of flooding and are concerned that more houses will cause further problems.
- They are concerned that recent development has not left the area in a very good condition.
- One respondent has proposed an alternative site in Longforgan.
- Some respondents consider the Inchtute site a better proposal.
- Several respondents note that the reasons contained in the 8 Reporter's Conclusions in Issue 27 of the Dundee Housing Market Area Settlements are still pertinent and objects to the site being proposed. They consider that there is no need to build any houses in the Perth side of the Greater Dundee HMA and state that research should have taken into account the fact that there is on average 10 houses up for sale this month in the Longforgan area. Furthermore, they state that within the last 18 months, 6 new houses (at least) have been constructed in the Longforgan town as very small builds or one offs. They feel this demonstrates that organic growth in local building will supply the requirement easily. They feel there is no need to open up major development by an apparent "back door" when the current need can and will be satisfied by current housing stocks. On top of this the section 4.1.5 of the MIR states "For the majority of smaller settlements in Perth & Kinross no changes are being proposed in this Main Issues Report".
- They consider that Longforgan is 2.5 miles from the edge of the new house construction in West Dundee and so the vast amount of take up should remain in Dundee, requiring no proposed changes by this report. They are concerned it might prejudice the delivery of the strategic sites at the Dundee Western Gateway expansion.
- One respondent was concerned with the loss of prime agricultural land and suggested, as an alternative, the testing of residential development of other brown-field sites within the settlement boundary.
- One respondent stated that it would be contrary to the policy of Scottish Ministers to allocate the site for residential development at Longforgan given the contributions made to Inchtute in relation to upgrading the school and the other community facilities.

OTHER

One respondent stated that they generally supported housing land within GDHMA so that people are close to their work hopefully with improved Public Transport and Park and Ride Scheme.

One respondent felt that the housing land shortfall in the Greater Dundee HMA should be targeted towards an enhanced Dundee Western gateway which is already identified as a strategic location and where development is already underway. Their view is that housing land shortfall in the Greater Dundee HMA should be targeted towards an enhanced Dundee Western gateway which is already identified as a strategic location and where development is already underway.

COUNCIL RESPONSE

All sites have been assessed in terms of education capacity, impact on biodiversity, flooding and drainage, access and infrastructure through the SEA site assessment process. The findings assessed that the preferred site is at Longforgan. As no new information has been brought forward during the consultation process, it is recommended that the Council goes with the preferred site at Longforgan.

However, since the consultation was undertaken, a planning application for an adopted site in Inchtute has demonstrated how it could meet the local housing needs without further greenfield sites being allocated. The density on this site could be considerably increased and this would then no longer require either new site to be allocated in the Proposed Plan.

Question 26:

If you wish to see changes made to the boundary of any of the towns or villages within the Highland Area, please indicate which settlement and provide details of the change you think should be made.

KEY AGENCIES

Historic Environment Scotland comment that any changes to settlement boundaries should be considered against the historic character of settlements and any historic environment designations that may be affected.

RSPB comment that any impacts on designated sites will need to be carefully assessed.

CHANGES PROPOSED TO EXISTING SETTLEMENTS

Changes to existing settlement boundaries are summarised below. Some respondents put forward proposals for new sites which do not necessarily result in a change to a settlement boundary. These are included below. Changes were also proposed to some of the principal settlements in the Highland area. These are discussed under the relevant question for each settlement (Q29-31).

Ballinluig

The settlement boundary should be extended east of the existing allocation at H40 and the commercial woodland. The new site could accommodate 25 houses and was proposed through the last LDP but was removed by the Reporter. It is a logical direction for the settlement to grow. The site is unconstrained, has infrastructure for service provision adjoining the site, and there is landscape capacity to accommodate it. There is market interest in Ballinluig. Upon completion of H40 there will be no further housing sites within the village to meet future needs. Allocating additional housing land in Ballinluig accords with the spatial strategy for the Highland market area through providing land to accommodate future demand market, consolidated around rural settlements.

Land along the western edge of Ballinluig should be allocated for employment use (Classes 4, 5 & 6). There is market demand for additional employment land within Ballinluig reflecting the location on the A9 and the growing demand for rural office and work space. The site has capacity for 1,000 square meters of commercial space. The site was previously considered in the preparation of the

adopted LDP. It is constrained by flood risk but through careful modelling and site design, commercial property can be delivered without placing existing or proposed properties at risk of flooding.

The House of Bruar Mail Order Warehouse should be included within the settlement envelope for Ballinluig. This would align the settlement envelope with a consented and implemented planning permission. The site presents a logical southern boundary as defined by structural planting and car parking.

Camserney

The boundary should be extended to include land to the south-east. The site is level and is bounded to the north and West by domestic properties, an access road to the east and trees to the south. It is a natural fit to the settlement.

Donavourd

Donavourd 1 (Call for Sites reference) should be allocated for housing. The site was promoted through the adopted LDP but was excluded by the Reporter. The site is available for self-build plots. It is well screened and new landscaping could provide a robust settlement edge. Access can be provided. No insurmountable constraints were raised through the SEA. Alternatively the site could be included within the settlement boundary as white land and the suitability for development then tested through a planning application. The site could contribute as part of the 30% contribution from small sites and windfall sites.

East Haugh

The current settlement boundary was amended through the adopted LDP to allow construction of a single house. The boundary should be further extended to allow a limited number of self build units fronting the road and mirroring the houses on the other side of the road. Increasing the contribution from small sites in the Highland area to 20% will require the extension of settlement boundaries to create opportunities for new housing and allow small settlements to grow organically.

A new site should be identified for employment close to the settlement boundary at East Haugh to allow the relocation of a local established and growing business which is seeking new premises on the A9 corridor. The preferred location is on land near the south east of the East Haugh boundary. This site offers the least impact on landscape and residential amenity although alternative locations on the adjacent land would be considered. The site would be developed for a shed/office unit and hard core storage area with room for future expansion, plus a shed to serve the remaining land which would be managed as farmland.

Fearnan

Two sites to the west of the settlement should be included within the settlement boundary and allocated for housing. Each could accommodate up to 30 units. The TAYplan sequential approach does not prevent expansion of non-principal settlements. TAYplan is under review and the extant strategy may be altered. The exclusion of development at non-tiered settlements would prevent reasonable development in rural areas, contrary to the aims and objectives of Scottish Planning Policy. The sites were promoted through the adopted LDP but were excluded by the Reporter as he considered Fearnan is not well connected and has limited employment opportunities. The respondent disagrees with this reasoning. Tourism opportunities, in particular, in the local area have increased substantially. No development for local housing needs has been provided in the last 20 years at the expense of much needed housing for growing families and housing choice and flexibility. Existing allocated sites in the Highland Housing Market Area are not delivering leaving a significant

shortfall and questioning the effectiveness of the allocated sites. The sites at Fearnan, however, meet the PAN 2/2010 criteria of effectiveness and should therefore be allocated.

A separate respondent requests that an alternative site in Fearnan be allocated. TAYplan allows for some development in settlements that are not defined as principal settlements. There are no physical or technical constraints to development, Fearnan is a marketable location, and the site is owned by a single local developer with intent to progress subject to planning permission. This site relates to the settlement in proximity and form and is the most logical direction for appropriate and deliverable extension. Due to the exclusion by the Reporter of alternative sites, Fearnan has no appropriate residential proposals.

The community council, village association and several residents support the retention of the current settlement boundary. The exclusion of the above-mentioned sites from the Main Issues Report is consistent with the previous LDP process and is supported. The protection of the current tranquil nature of the village is valued by residents.

Murthly

Four sites should be included within the settlement boundary and allocated for housing. TAYplan allows for some residential development outwith the non-tiered settlements and this reason for the sites being excluded from the MIR should therefore be retracted. The sites would make developer contributions which would positively benefit the existing and proposed new residents of Murthly.

Murthly 1 is promoted by two respondents. This would extend the H45 allocation, where the principle of development has already been established. The previous Reporters finding that a bigger allocation would substantially alter the character of the village is disputed; the existing boundaries are too constrained. This is a logical extension which will give greater depth to the site allowing the opportunity to create a focal point around a "village green" rather a linear development. There are no physical or technical constraints to development, the site is in a marketable location and is controlled by a single local developer. It is compatible with existing / neighbouring uses, visually well contained, well connected and offers potential for expansion to the west in future years.

Murthly 2 should be considered on its own merit, removed from any historical legacy and considered a small scale development, as supported by TAYplan.

At Murthly 3 the issue of coalescence is overstated as the extent of the proposed site is only indicative at this stage. Rejecting the site on the basis of coalescence is premature and a more flexible view should be taken.

At Murthly 4 flooding constraints could be mitigated which would also benefit existing residents in the locality. The site should therefore be supported for the positive benefits it could deliver.

Strathtay

The settlement boundary should be extended to the west of Strathtay. The site is derelict grassland with some trees and is bounded by the road to the north a church to the west and the land to the south and east has planning consent for housing. The settlement boundary should be amended as proposed to create a more logical and defensible settlement boundary in this location.

Pitnacree

Pitnacree is a coherent addition to the group of communities – Strathtay, Grandtully and Little Ballinuig – that sit on the banks of the Tay. A settlement boundary should therefore be created

around Pitnacree and it should be included within this wider group to help ensure development is suitably attributed over this distributed settlement area.

A site should also be allocated for housing development at Tulloch of Pitnacree. The site is accessible, deliverable, not at risk from flooding, and would not have a material impact on farming activities. Development would allow consolidation of the existing pattern of housing development around Pitnacree Farm.

Rannoch Station

A settlement boundary should be identified for Rannoch Station to give opportunities for some small scale infill development. There is no justification or explanation why some small settlements have identified boundaries and others don't. TAYplan Policy 1 allows for development in non-principal settlements and the Main Issues Report recognises that development in smaller settlements can help sustain these communities. There should be a plan led approach to the identification of settlement boundaries to provide more certainty for communities and investors rather than relying on Policy RD3. These could be shown in supplementary guidance. Rannoch Station is in a unique rural situation as it is located on a main railway line with access to the wider rail network and is regarded as a recognisable settlement, yet it does not have a settlement boundary. The suggested boundary offers sensible and realistic opportunities for limited small scale development.

OTHER COMMENTS

Settlement boundaries provide some assurance about a likely proposal and its extent and scale. The present arrangement where development in the villages without boundaries is a development management issue and not a development planning issue is the antithesis of good planning. A settlement boundary could potentially help sites to make a contribution to meeting needs.

Object to proposals to greatly expand some settlements whilst failing to ensure the sustainability of existing smaller communities where the local facilities seem in danger of becoming non-viable.

COUNCIL RESPONSE

The TAYplan spatial strategy allows for development in non-tiered settlements where this can be accommodated and supported by the settlement, and in rural areas, if such development genuinely contributes to the objectives of TAYplan and meets specific local needs or supports regeneration of the local economy.

Ballinluig

There is already a housing site allocated in Ballinluig. To allocate an additional site for a further 25 houses would risk undermining the TAYplan spatial strategy of directing the majority of growth to the principal settlements.

The site included in the previous Proposed Plan as E11 was deleted by the Reporter because there was significant doubt as to whether development would be possible due to flood risk. SEPA's concern was that the flood risk cannot be mitigated without running the risk of flooding to neighbouring areas. No new information has been submitted to demonstrate that these concerns can be addressed.

The House of Bruar Mail Order Warehouse is not immediately adjacent to the existing settlement boundary for Ballinluig but is separated from it by the A9 and the junction with the A827. Given that

the planning permission for this site has been implemented there is no logical reason for including this area within the settlement boundary.

Camserney

A boundary extension to include land to the south-east was proposed through Call for Sites and again at MIR stage. The settlement boundary at Camserney in the adopted Plan was drawn to offer the potential to accommodate some additional residential and employment development. The boundary was amended during the previous Inquiry to include land to the north of the area now being proposed. The Reporter considered that this would provide an opportunity for small scale housing development. The area now proposed is more visible and development here would be more likely to have an impact on views in from the main road. In light of this, and given that there is already scope for development within the adopted boundary, it is not proposed to amend the boundary further in the Proposed Plan.

Donavourd

The scale of this proposed site runs the risk of undermining the overall spatial strategy of TAYplan to direct the majority of growth to the largest settlements. It is considered too large an extension to the existing settlement and there are concerns as to whether a suitable access could be provided. On this basis it is not considered to meet any of the TAYplan requirements for development in non-tiered settlements set out above.

East Haugh

A boundary extension to the south is proposed. The site is adjacent to an area which was included within the settlement boundary at Proposed Plan stage last time round. It is not clear why the boundary change was made last time but development along this southern boundary would be highly visible from the A9 as there is no existing landscaping framework which would screen development. The adopted Plan states that the boundaries round this group of settlements was tightly drawn to help maintain the character and setting of the area. Amending the boundary to include an undefined site would not be in line with this but rather could signal that a piecemeal 'eating away' at the boundary along this southern edge is acceptable. It is not therefore proposed to amend the boundary in the Proposed Plan.

The site proposed for employment uses is, in part, adjacent to the existing settlement boundary. However, that part which is proposed for built development is not adjacent and is actually at the furthest point from the settlement. A willingness to consider alternative locations within the overall site has been indicated, however, this would still be a significant linear expansion and it is questionable as to how well development on the site would relate to the existing settlement. It is therefore considered that such a proposal would be better assessed against Policy ED3 Rural Business and Diversification rather than by means of an amendment to the settlement boundary.

Fearnan

The scale of the proposed sites runs the risk of undermining the overall spatial strategy of TAYplan to direct the majority of growth to the largest settlements. Individually each is considered too large an extension to the existing settlement, cumulatively the impact would be even greater. Fearnan is a fairly remote settlement with limited public transport links and development would therefore create additional car traffic. There are few employment opportunities. The previous Inquiry therefore concluded that additional larger scale housing development would not be consistent with the Plan's vision for sustainable economic growth. Nor is it considered to meet any of the TAYplan requirements for development in non-tiered settlements set out above.

Murthly

The scale of Murthly 1 & 2 run the risk of undermining the overall spatial strategy of TAYplan to direct the majority of growth to the largest settlements. Either would create a large extension to the existing settlement which has already grown significantly in the recent years. For Murthly 1 in particular, the Reporter at the previous Inquiry concluded that any larger an allocation in this part of the settlement would constitute a significant intrusion into open countryside substantially altering the character of the village. Murthly 3 & 4, while smaller in scale, each have disadvantages which were highlighted through the SEA process. Murthly 4 was removed by the Reporter in the previous Inquiry due to flood risk. Murthly is six miles from the nearest local service centre and has limited public transport links so the development of some or all of the proposed sites would be likely to create additional car traffic. None of the proposed sites are considered to meet any of the TAYplan requirements for development in non-tiered settlements set out above.

Pitnacree

The proposed site is not within a settlement boundary as and such would most appropriately fall to be assessed against Policy RD3 Housing in the Countryside, rather than become an allocation in the Plan.

Strathtay

A boundary extension to the west is proposed. The area is the same as that discussed at the previous Inquiry and is adjacent to a site which has planning permission for two houses (and is within the boundary). The Reporter considered that this additional area, comprising of the rest of the field and a tree belt, would provide a more defensible settlement boundary. Yet, this was not included as a recommendation and as such the boundary was not changed. It is still considered that the inclusion of this area within the settlement boundary could, if developed, result in a significant expansion of the settlement. There are already opportunities for small scale infill development within the adopted boundary and as such it is not proposed to amend the boundary in the Proposed Plan.

New settlement boundaries

Through the preparation of the current adopted Plan it was agreed that the smallest settlements were adequately covered by the Housing in the Countryside policy and did not therefore require to have a boundary identified. Generally, those settlements with less than 20 houses and no facilities do not have a boundary. On this basis it is considered that any proposals for development in either Pitnacree or Rannoch Station can be adequately dealt with through policies RD3 Housing in the Countryside or ED3 Rural Business and Diversification without the need to identify a settlement boundary.

Two settlement boundary changes were also proposed through the Call for Sites but which were held to be considered at Proposed Plan stage:

Acharn

An amendment to the settlement boundary to include land adjacent to the existing employment area was proposed. It is suggested that this would make a logical extension area for the workshop which currently accommodates two small businesses and storage space for the farm. The landowner has no plans at present to develop the site but considers there is potential to replace the existing workshop with a small modern business complex and therefore wishes this area to be included within the settlement boundary. The settlement boundary at Acharn already includes several undeveloped areas which could potentially accommodate some employment development. Furthermore, the revised policy PM4 does allow for development adjoining the settlement boundary where it accords with policy ED3: Rural Businesses so the site could potentially be developed

without requiring a change to the boundary. In light of this, and given that the landowner doesn't have any current plans to develop the site, it is proposed to leave the settlement boundary as is in the adopted Plan.

Dull

Inclusion of the field at the south east between the access road and farm track was proposed at Call for Sites stage. The same site was rejected for inclusion within the settlement boundary by the Reporter at the previous Inquiry. The field in question is a sloping site with prominent views in from the main road. The Reporter concluded that it helps form the setting of the village and development would be likely to have an adverse visual impact on the surrounding area. It is not therefore proposed to include this within the settlement boundary in the Proposed Plan.

Question 27:

Do you agree that the preferred option to meet the housing land requirement in the Highland HMA is a reallocation of 10% to the Perth HMA?

Yes/No

Please briefly tell us the reasons why and if not, how do you suggest the shortfall in housing land supply should be accommodated.

KEY AGENCIES

SNH disagrees with the preferred option supporting instead the approach provided by TAYplan for 15% of the housing land requirement to be re-allocated to the Perth HMA in recognition of the environmental constraints in this area.

SUPPORT

Support for the preferred option came from a mix of landowners and individuals.

The reallocation recognises the environmental constraints in the Highland area. Perth can continue to expand with little detriment to its infrastructure and amenity but smaller communities can be significantly altered by additional development. Perth has the most potential for economic expansion which assists rural communities and jobs, and it is appropriate to direct an increased allocation to areas where there is a proven track record of delivery and land is more readily available. It would also help reduce commuter distances. One respondent considered that an even larger percentage should be reallocated as there is a need for more dwellings within the Perth Housing Market Area.

OPPOSITION

Homes for Scotland disagree with the preferred option.

Further objection to the preferred option came from a mix of landowners and individuals.

Need and demand should be met as close to where it arises. The reallocation of housing land to different HMA defeats the purpose of having an HMA in the first place. Reallocating to Perth HMA will not assist with the pressures on the Highland HMA as market demand will remain. The problem is the availability of funding in the market.

Various alternatives are suggested:

- All of the housing supply in the Highland HMA should be directed towards the main settlements; the allocation of effective sites, preferably on sites that are adjacent to existing settlements, will negate any shortfall in the future.
- Identify suitable opportunities outwith the principal settlements.
- Distribute development across the authority area to help prevent cumulative impacts overwhelming particular areas, and ensure economic development is not concentrated in one area to the detriment of others.
- Settlement boundaries should be reviewed and loosened, and the opportunity for infill assessed to determine whether existing settlements can accommodate the housing land requirement, and meet existing demand, before deciding to reallocate to the Perth area.
- There is already a surplus in land supply in Perth and an existing re-allocation from the Kinross Housing Market Area; reallocation should only happen where it can be shown that there are deliverable sites in the Perth HMA that can accommodate this redistribution.
- The 10% does not have to be reallocated solely in the Perth HMA. It could be accommodated within several of the other HMAs. Alternatively it could all be reallocated to a specific site within the Perth HMA.

Question 28:

In the event of the new Approved TAYplan including a requirement for an additional 10% flexibility, do you agree that the preferred option to meet the housing land requirement in the Highland HMA is a reallocation of 15% to the Perth HMA?

Yes/No

Please briefly tell us the reasons why and if not, how do you suggest the shortfall in housing land supply should be accommodated?

KEY AGENCIES

SNH supports the approach provided by TAYplan for 15% of the housing land requirement to be re-allocated to Perth HMA in recognition of the environmental constraints in this area.

SUPPORT

Further support for the preferred option came from a mix of landowners, individuals and one land promoter. Most respondents made the same or very similar comments to that for Q27.

Perth can continue to expand with little detriment to its infrastructure and amenity but smaller communities can be significantly altered by additional development. Perth has the most potential for economic expansion which assists rural communities and jobs, and it is appropriate to direct an increased allocation to areas where there is a proven track record of delivery, and more scope to accommodate a bigger proportion of the total housing land requirement. It would also help reduce commuter distances and would support the delivery of infrastructure in Perth. One respondent considered that an even larger percentage should be reallocated as there is a need for more dwellings within the Perth Housing Market Area. Another respondent considered that either a 10% (as discussed under Q27) or a 15% increase would be acceptable.

OPPOSITION

Homes for Scotland does not support the preferred option. Their objection relates to the wider issue of not including an additional flexibility allowance.

Further objection to the preferred option came from a mix of landowners, individuals and one housebuilder. Again, some of the comments were similar to those received in response to Q27.

It is unclear why an extra 5% is being sought, this requires clarification. Any requirement for additional flexibility should be built into the plans for the Highland HMA. This is a large geographical area and there should be scope for accommodating its housing needs within the HMA. Another respondent considered that a 10% reallocation is sufficient. A number of alternatives to the preferred option are suggested:

- Adopt a more flexible approach and identify suitable opportunities outwith the principal settlements.
- Settlement boundaries should be re-examined to determine whether existing settlements, and areas adjacent to these, can accommodate the housing land requirement before deciding to reallocate to the Perth area.
- Distribute development across the authority area to help prevent cumulative impacts overwhelming particular areas, and ensure economic development is not concentrated in one area to the detriment of others.
- The 10% does not have to be reallocated solely in the Perth HMA. It could be accommodated within several of the other HMAs. Strathmore and the Glens HMA is suggested in particular as this area is likely to have more similarities with the Highland HMA than the Perth HMA. Alternatively it could all be reallocated to a specific site within the Perth HMA.

COUNCIL RESPONSE

Combined response for Q27 & 28

The Council does not agree with SNH's suggestion that the full 15% should be reallocated regardless of any additional flexibility allowance which may or may not be required as a result of the TAYplan examination. Proposed TAYplan allows for up to 15% of the housing land requirement in the Highland area to be reallocated but it is considered appropriate to only reallocate that which is necessary to meet the shortfall in housing land supply.

The Council has an obligation to address the housing land requirement. In doing it should first and foremost seek to meet need and demand in the area in which it arises. However, there are significant numbers of environmental designations, which are large in scale, across the Highland area. It is considered that any disadvantage of not meeting the housing land requirement in full within the area is outweighed by the benefits of protecting these valuable environmental assets. TAYplan allows for reallocation on the grounds of significant environmental or infrastructural constraint and the Reporter previously accepted similar arguments for a reallocation from the Kinross HMA. The actual numbers involved are relatively small over the entire period to 2028 amounting to approximately 10 per year.

As discussed in the Main Issues Report, the nature of the housing market in the Highland area is different to other areas in that over half of house moves are people moving into the area from outwith. This makes it one of the least self-contained housing market areas in the TAYplan area.

Reallocating a proportion of the housing land requirement to the Perth area would therefore have less of an impact than it would in a more self-contained area.

As discussed under question 3, it is not considered that meeting the housing land requirement necessitates a general loosening of settlement boundaries.

The identification of sites outwith the principal settlements is not in line with the TAYplan spatial strategy and a number of such sites were removed by the Reporters at the previous Inquiry. The Perth Core Area is the only tier 1 area in Perth & Kinross. There is a generous surplus in housing land supply in the Perth HMA and the additional 130 units from the Highland area could easily be accommodated. It was therefore considered most appropriate that any reallocation is to the Perth HMA rather than any of the other areas. However, the calculation of the housing land requirement and supply for the Proposed Plan using the 2016 Housing Land Audit showed that reallocating a proportion of the housing land requirement to the Perth HMA would not be necessary at this time as there is sufficient supply (together with windfall and a 15% small site allowance) to meet the housing land requirement set out in TAYplan.

Question 29:

Do you agree that the preferred option for Aberfeldy should be to continue with the existing allocations (Map 20)?

Yes/No

Please briefly tell us the reasons why If you think either of the alternative options for Aberfeldy (Maps 21 or Map 22) should be pursued please indicate which option and briefly indicate your reason.

KEY AGENCIES

SNH support preferred option to retain the existing sites as Amulree Road site is visually exposed and forms an important part of the rural character within the Strath and the setting of Aberfeldy. Development of this site has potential for adverse effects on the landscape character within Strath Tay, the setting, approach and general perception of Aberfeldy from the A827.

SEPA support the preferred option but make specific recommendations and requirements in relation to sites H36 and H37, in particular that the watercourses in H36 and H37 are retained as open channels, an appropriate buffer is included to minimise the risk of pollution to the watercourse from development, and Drainage Impact Assessments are carried out. Similar requirements are made in respect of the Amulree Road site.

Scottish Water neither supports nor objects to the suitability of the locations detailed within the Main Issues Report. Whilst there is sufficient capacity at both the Waste Water and Water Treatment Works, notable development in Aberfeldy would require Water and Drainage Impact Assessments to establish what network upgrades are required. There are a number of Scottish Water potable assets to immediate east of Amulree Road site which would need protection measures during and after construction.

SUPPORT

Support for the preferred option was largely due to concerns over the alternative options:

It is preferred to the alternative option of replacing site H37 with the Amulree Road site. Site H37 is effective and deliverable and a planning application has now been submitted. Part of the wider site has already been developed for housing and there is a valid consent to carry out another phase. Construction only halted because of market conditions and the layout and house types incorporated in the outstanding consent is currently being reviewed in light of market demand.

It is preferred to the alternative option of allocating three sites in Aberfeldy. This would either result in too significant an increase which would impact adversely on services and infrastructure, or would lead to the same number of houses spread over three sites rather than two but requiring the necessary infrastructure to be installed in all three sites. As above mentioned, site H37 is effective and there is therefore no need for the addition of a third site at Amulree Road.

There are concerns over the development of the Amulree Road site. The site is visually prominent from the town due to its elevation and steepness and if developed would destroy the 'natural settlement' edge to the south and west. Vehicular access would be difficult from the north due to the restricted width of Old Crieff Road and would add to existing congestion. Retention of a footpath on this road, and existing on-street parking, would further restrict the width making it unsuitable for large vehicles and necessitating traffic flow management. Traffic issues would be further exacerbated should site H36 be developed also. The A826 to the south of the Amulree site is busy and access from it would be from a steep slip road which would be further from the town centre, thus putting additional pressure on the Old Crieff Road exit. It may require re-alignment of the road. There are flooding issues on the western edge / north western corner. Flood risk assessment must include consideration of the risk from increased run-off and the potential threat to existing houses outwith the site. Existing culverts overflow and any development which increases the flow into the watercourses could cause flooding. Similar flooding issues may be caused by developing the Amulree Road site. There are problems with existing sewage and waste water courses in the area have caused drains to overflow and sewage to back up and overflow. Capacities would need to be increased.

One respondent commented that the lack of drive from developers to develop the existing allocated sites suggests a lack of a genuine need. There does not therefore seem to be any urgent need to revise the original allocations.

Another respondent, whilst continuing support for the allocation of site H36, seeks a change to the developer requirement on access (change underlined): "Access from A827 with secondary link into Old Crieff Road along Borlick Farm access track or other suitable secondary route".

OPPOSITION

The alternative option of deleting H37 and replacing it with the site at Amulree Road should be taken. The Amulree Road site presents an opportunity to round off the settlement boundary set by adjacent development, and provide a longer term direction for settlement growth on the southern edge of Aberfeldy. All service connections are available and no abnormal issues are expected.

An alternative view is that site H37 has been proven to be fully ineffective as no progress has been made, it should therefore be removed. Should site H36 progress and planning permission in principle granted before the Proposed Plan it should also be removed as it no longer requires to be allocated. The effectiveness of the alternative options should be fully considered before they are proposed for allocation. The focus should be on sites that are demonstrably effective, such as sites being promoted at Fearnan.

COUNCIL RESPONSE

One of the main arguments for and against the preferred option hinges on the effectiveness of site H37. This site is now progressing and has In Principle planning consent (granted July 2016). As such there is no justification for removing it from LDP2. The allocation of three sites in Aberfeldy is unlikely to result in the delivery of higher numbers of houses, rather the same number will just be split over three sites instead of two. The concerns over the potential adverse impacts of developing at Amulree Road are acknowledged. Steps would be taken to mitigate adverse impacts but in light of the above it is not considered appropriate to allocate the site for development in the next LDP.

At H36, the developer requirement for a secondary access link into Old Crieff Road along the Borlick Farm access track was not raised as an issue during the last inquiry. No proposals have formally been put forward for an alternative secondary access. It is therefore not proposed to amend the developer requirement.

Question 30:

Do you agree that the preferred option for Dunkeld & Birnam should be an amendment to the northern boundary of Dunkeld (Map 23) to allow scope for a limited amount of small scale windfall residential development?

Yes/No

Please briefly tell us the reasons why

KEY AGENCIES

SEPA support the preferred option. A sewer connection is available in this area. Development should alleviate flooding issues and de-culvert the watercourse with an appropriate buffer if feasible. There is also a risk of pluvial flooding. A Flood Risk Assessment and Drainage Impact Assessment would be required.

Historic Environment Scotland neither supports nor objects to the preferred option. The proposed boundary amendment lies wholly within the Dunkeld Inventory Battlefield designation and any development should consider the potential impact on this designation.

SNH express concern at the preferred option. This area is within the River Tay (Dunkeld) National Scenic Area (NSA). This area has no capacity for any further development without adversely affecting key qualities of the NSA due to the high visibility of the site (see photo). The site is sloping pasture which constitutes a key part of the town's setting and the Special Qualities of the NSA. It reads as an extension/continuation/setting of the Dunkeld House policies. Development is to be limited to windfall but inclusion of this area into the settlement boundary could cause confusion about the suitability/availability of this area for development.

SUPPORT

Support for the preferred option came from the landowners of the area proposed for inclusion within the settlement boundary. The sensitivities of developing within Dunkeld are recognised but there is the opportunity to deliver a range of housing tenures to meet local needs. Any proposal would have to be small scale and avoid the higher slopes to reduce the risk of adverse impact on the

conservation area; a bespoke design-led approach will be required. Further site and technical analysis has been commissioned to inform preparation of the Proposed Plan.

OPPOSITION

This large increase in developable land would potentially substantially increase the size of Dunkeld, exacerbating existing traffic issues and adversely affecting quality of life. There is no indication of plans to increase facilities for an enlarged population.

One respondent appears to disagree with the preferred option on the basis that there should be no reliance on windfall opportunities. The allocation of effective sites will negate any shortfall in the future.

Alternative northern boundary

Birnam/Dunkeld is a principal settlement. It is therefore necessary to consider how it can grow organically in the future. A settlement boundary review is the most appropriate way to allow further small scale development in light of the constraints, and acknowledging the significant contribution of small sites Highland Perthshire. However, the proposed change does not fully reflect the natural and manmade features which should influence the settlement boundary. An alternative northern boundary is suggested that would more readily define the settlement boundary and still allow for limited development opportunities.

New site - Birnam

Either as an alternative, or in addition, to the proposed boundary amendment, an infill housing site is proposed in Birnam. Dunkeld and Birnam is a principal settlement and therefore it should be allowed to grow organically in the future. Including this additional land in Birnam would allow for such growth. The proposed boundary amendment at Dunkeld does not offer sufficient range and choice. The proposed site at Birnam would allow for a limited amount of windfall development to be brought forward in a manner that would not have an adverse impact on the special features of Dunkeld and Birnam.

COUNCIL RESPONSE

The nature of this is such that large scale development is unlikely to be achievable. However, if this area is included within the settlement boundary as unallocated land this could imply that development would be acceptable in principle. This would also be the case for the alternative northern boundary. In light of this potential confusion, and SNH's concerns regarding the possible adverse impact on the National Scenic Area, it is proposed that the current boundary in the adopted Plan is retained.

New site - Birnam

Approximately half the site is designated open space which is part of a larger allocation along the bank of the river. The Plan presumes against loss of open spaces. The remainder of site is unallocated land within the settlement boundary which could come forward for development without being allocated. It is therefore not proposed to allocate the site.

Question 31:

Do you agree that the preferred option for Pitlochry should be minor extensions to the existing sites at H38 and H39 (Maps 24 and 25) together with a review of the existing land use allocations shown in Map 26 to allow scope for some small scale windfall residential development within the settlement boundary?

Yes/No

Please briefly tell us the reasons why

KEY AGENCIES

SNH support the extension to H38 if the woodland on the site is retained. No comments on the extension to H39.

SEPA support the preferred option but there are a number of issues to be included in the development requirements. At H39 the requirement for a buffer strip should be expanded to include the watercourse at the eastern boundary of the extension site, and no development should occur on top of the piped flows to the underground reservoir in the south. Contact should be made with the reservoir owner. At E38 there should be a requirement for an appropriate buffer strip to the adjacent watercourse, and a presumption against culverting. Odour issues from the sewage treatment works need to be investigated. SEPA reserve their position in relation to any potential cemetery extension as insufficient information is currently available as to ground conditions and potential impact on groundwater. A developer requirement requiring intrusive ground investigations may be required. Drainage Impact Assessments should be required at both sites in addition to Flood Risk Assessments.

Scottish Water neither supports nor objects to the preferred option. Whilst there is sufficient capacity at the Wastewater and Water Treatment Works, notable development in Pitlochry would require suitable drainage and water impact assessments which may highlight the need for local network upgrades to the sewer or water infrastructure.

Sportscotland neither supports nor objects to the preferred option but notes that there is at least one grass football pitch in the area highlighted for review. Any review should include a note that the provisions of Scottish Planning Policy paragraph 226 would apply to any redevelopment.

RSPB neither supports nor objects to the preferred option but welcomes the inclusion of compensatory planting.

SUPPORT

The sites submitted at Call for Sites stage (within the area proposed for review) should be brought forward as allocations in the proposed Plan LDP. The sites are all small scale, mostly infill and sympathetic developments to the existing settlement. Allocations at H38 and H39 should remain. Through the existing allocations and the new proposed sites, the principle of development has already been established.

The proposed extension to H38 is small and appropriate. A Proposal of Application Notice was submitted in May 2015 to start the application process. Felled trees should be replaced.

The proposed extension to H39 is small and appropriate. It is required due to technical difficulties in accessing the site. The developer is happy to accept a specific developer requirement that the extension area cannot be used for any purpose other than access and open space. Delivery is assured if the boundary is changed.

OPPOSITION

The existing zonings in the area to be reviewed should be maintained and windfall housing resisted. The employment land is needed and should be retained. Open space is heavily used and should be retained. Individual sites are separated by attractive woodland and a shift to much higher land values for housing will put too much pressure on this character. The current woodland cover gives a fine informal boundary between open space and employment land and the *status quo* should continue.

In addition, the general comment was made that there is adequate land zoned for housing as evidenced by the poor take-up of existing zonings. There is continued pressure for smaller scale development in areas around the periphery of Pitlochry and the cumulative impact of these has led to problems. Road safety, drainage and general lack of infrastructure for what are now small villages in their own right needs to be addressed and a moratorium put in place on further consents for new housing.

COUNCIL RESPONSE

H38 extension

SNH support the extension providing that the woodland on the site is retained. The SEA found that whilst the woodland to the north and south is designated as Ancient Woodland, the woodland in the proposed extension area is not included within this designation. There is existing woodland to the north and west of the extension area and as such the removal of this small area is unlikely to result in any significant fragmentation of the green network in this area. Indeed, by providing compensatory planting elsewhere on the site (which is currently open grazing) there may be the potential to actually improve habitat connectivity through development. Allowing the extension would also give scope for the future expansion of Fonab cemetery which would otherwise be unlikely to be possible if the entire site is developed for housing.

H39 extension

There is general agreement that this proposal is acceptable given that it is necessary to facilitate access into the existing site. The extension area will be restricted to access and open space.

Land south of the railway

The primary purpose of the review was to ensure that the land use zonings in LDP2 accurately reflect what is on the ground, rather than as a means of identifying additional land for housing development. Much of the land identified as existing employment land (and previously designated in the Highland Area Local Plan for 'leisure, tourist, business and open space in woodland setting') is not in fact in employment use. The areas designated as open space in the adopted Plan are retained and it is proposed to re-designate some of the area currently allocated as existing employment land to open space. The review identified two areas which are not in existing employment use and are not serving a function as open space: the land adjacent to the former car park, and land at the former amusement arcades. It is therefore proposed to remove the existing employment land designations and leave these areas as unallocated land in the Proposed Plan.

Small scale developments around Pitlochry

The pressure for smaller scale development in areas around the periphery of Pitlochry and the cumulative impact of these are acknowledged. The TAYplan strategy directs growth to the principal settlements and LDP2 will continue to allocate housing land on this basis. It is not considered appropriate however to impose a moratorium on further consents for new housing in the small settlements around Pitlochry as such developments can have a positive effect in helping to sustain these small communities. Such applications for new houses will continue to be assessed on their individual merits and conditions imposed where necessary to mitigate any adverse impacts. The specific concerns in relation to Donavourd are acknowledged and this particular settlement is discussed further under Qn 26.

Settlement boundary amendment at Moulin

At Call for Sites stage a site was proposed at Moulin to the north of Pitlochry. This site forms part of a wider area which was proposed for inclusion within the settlement boundary in the previous Proposed Plan on the grounds that it would offer an opportunity for small scale housing development. The Reporter, however, took the view that this area forms an important component of the setting of Moulin and that the inclusion of this wider area within the conservation area suggested that it has value as open space for the setting of the conservation area. Whilst the area now proposed is smaller than that discussed at the previous Inquiry, the Reporter was clear that any development in this area would be unduly prominent and detrimental to the landscape setting and character of the conservation area. It is not therefore proposed to allocate the site for housing.

Question 32:

If you wish to see changes made to the boundary of any of the towns or villages within the Kinross Area, please indicate which settlement and provide details of the change you think should be made.

KEY AGENCIES

Historic Environment Scotland clarify that any changes to settlement boundaries should be considered against the historic character of settlements and any historic environment designations that may be affected.

SEPA take a precautionary approach and require the removal of E35 Balado allocation. SEPA have undertaken SCAIL model screening in an attempt to quantify the human health impact from particulate matter (PM10) on this potential sensitive receptor. Screening failed for both the long and short term objectives. Therefore SEPA suggest that if the Council retains this site for development, it is required to undertake a detailed assessment. If it is found that the concentrations of PM10 exceed objectives, the Council would need to designate an Air Quality Management Area. Any action plan produced would need to involve SEPA as the regulating authority to consider how to reduce emissions from the installation.

OTHER COMMENTS

Kinross Community Council supports the existing LDP settlement boundary for Milnathort and Kinross and the retention of greenspace between the communities. There were also quite a few comments made in support of the existing LDP settlement boundaries in Kilmagadwood, Scotlandwell, and seeking the retention of the gap between Kilmagadwood and Woodmarch. The comments refer to: the different characters of the places and the desire to keep these distinct and protect their visual amenity and rural setting; the need to protect the integrity of Scotlandwell

Conservation area; and the need to avoid ribbon development and preserve views to Loch Leven and Lomond Hills. There is also support for growth where it is sensitive to the character of the settlements and is accompanied by improvements to amenities.

Cllr Barnacle on the other hand prefers the linkage of Kilmagadwood and Scotlandwell into one settlement boundary.

Kinross Civic Trust and Cllr Barnacle also seek the reinstatement of the 9 small settlements that had their Settlement Boundaries removed on the assertion that the Housing in the Countryside Policy would protect them. The Trust does not accept that this is adequate protection and would ask that all these small Settlement Boundaries be reinstated. Cllr Barnacle would also like the work of the Fossoway Trust and the finalised maps for Blairingone, Crook of Devon, Powmill and Rumbling Bridge to be revisited.

Kinross Civic Trust, Cllr Barnacle and another respondent are concerned that Glenlomond has the potential to grow too large and that the access road is not adequate to accept the additional traffic. One respondent submits a report on traffic to try and demonstrate the issue, suggesting that there is no way to improve the winding lane through Wester Balgedie, with the assertion that this lane is already close to not being suitable for any further development. It is proposed that the LDP2 sets a maximum limit on the number of houses that may be built as has been stipulated for the similar situation at the former Ochil Hills Hospital.

Gladman Scotland consider the Council's approach to housing land requirement flawed and therefore additional sites in all key settlement should be considered and included in the Proposed Plan. The following proposals were put forward by respondents as suggested changes to settlement boundaries/new sites in Kinross area:

- Land west of Cairnwell in Drum which is currently identified as open space proposed as white land as it is suggested this is not public open space as it is not a recreation resource, recreational facility or sports pitch;
- Land at Fossoway glebe, Crook of Devon as per previous call for sites submission (Crook of Devon 1) for residential development suggesting that this would support improvements to the primary school and off-site public space.
- Inclusion of a field at Bishop Terrace into the Kinnesswood boundary which comes with an agreement to transfer of 6 hectares of hill ground to the community. There is support from Portmoak Community Council, and Cllr Barnacle for this. A + J Stephen's suggest that this is compatible with the character of the area and advise their intention to take entry of Bishop Terrace. The Community Council also suggest that including the hill ground within the settlement boundary and identifying as an amenity space could be a better approach.
- Land to the east of H54 in Scotlandwell which it is suggested could provide open space for the village and help support the local schools (and if no further housing land is required in this LDP then the site could be extended and density lowered). It is considered that the land at Scotlandwell could incorporate open space provision within it which would extend the existing area of open space southwards and provide a more formal and useable area for residents of Scotlandwell (plan attached). It is also submitted that an extension eastwards would allow for the provision of safeguarding the viewpoint from the Burial Ground. Portmoak Community Council support this expansion subject to this providing no increase in the number of houses, 1 ½ storey, protecting the outlook from Friars place, including some low cost housing, and contribution to community benefit such as public parking, or a revised and safe footpath from Scotlandwell along the A911 to the Church and Hall. Cllr Barnacle also possibly supports this proposed extension with requirement for single storey and ensuring an open space corridor from Leslie Road to the southern boundary.

- Allocating land to the north of the care home Rumbling Bridge for housing on the following basis: it would round off the settlement; that TAYplan strategy is not confirmed yet and that excluding sites in non-tier settlements would prevent reasonable development; historic development has been larger houses and there has been no local needs housing; it is an effective site; and the community is much more sympathetic and recognise the merits of the site and understand that both Fossoway Community Council and Cllr Barnacle support the site. Respondents from Drum and Crook of Devon have written in to express support of this proposal for the following reasons: support for smaller more affordable properties; could bring some recreation space; and would help address linear form/ribbon development.
- Inclusion of land to the east of Scotlandwell. Challenges reasons given for not supporting: it is considered that this proposal is compatible with TAYplan strategy which allows for small scale development in non-tier settlements as long as there is an economic case and there is no significant negative impact on the countryside; and considers that ribbon development is the existing settlement form along Leslie Road. Benefits of this proposal are proposed as: creating a sympathetic landscape for the forestry road here (reducing visual intrusion); community infrastructure contributions and other benefits secured through development management process; and income would be used to offset the cost of the forestry access and help fund further improvements to their equestrian business.
- Land at Hatchbank for housing and community uses/ services of a scale appropriate to its rural locale. It is considered that an allocation adjacent to the existing residential properties would allow for some organic development and that the policies of the plan should allow for small scale development to be considered on its merits where it relates to existing established development;
- E35 seeking a change in the uses to support a mixed use element including residential. In support of this proposed change, a potential indicative masterplan is provided and it is mentioned that: the site has been marketed for significant time as an employment site; and that the viability of settlements can never be fully addressed by TAYplan (and that TAYplan does offer support for brownfield development); the Council gave supportive pre application advice and there is lots of greenfield housing development nearby; and that the Council is being almost obstructive to assisting redevelopment for a viable alternative use.
- Proposal to extend the settlement boundary at Carnbo to include land bounded to the south by the A91, housing to the east and farmland to the north and west, up to the SEPA medium risk area for flooding (with this land included as a landscape/recreational area to help address shortfall in open space), this includes the Mill Lade but this was blocked up many years ago at source some distance from the site and mostly infilled;
- Land at Perth and Burleigh roads should be identified as housing allocations in Milnathort (fuller submissions made against Q34);
- Land at Lethangie OP15 should be identified as housing allocations within the settlement boundary for Kinross (fuller submissions made against Q34)
- Blairingone suggestions made in relation to the settlement boundary to retain it, however further submissions made in relation to Q36 and Q37 suggest a boundary change to include additional land to the south of the A977 opposite H74.

There were some proposals submitted at the Call for Sites stage which were not of a scale or significance to require assessment through the MIR, but need to be considered in terms of whether they merit settlement boundary changes in the Proposed Plan. Sites were submitted for a single plot at the north end of Maryburgh, and on open land between Keltybridge and the farm building.

The following miscellaneous comments were made: BP seek to keep the site reference for H52 to consult with HSE; and it is suggested that the Call for Sites Scotlandwell 2 is not in a SEPA medium flood risk area.

COUNCIL RESPONSE

In terms of E35, the council's air quality duties, the PM10 and NO2 pollution do not actually apply in areas where the general public do not have access to. This means should the land be purely for employment i.e. industrial units or offices, where the general public would not be expected to be so the Council would not have to do any assessment of air quality effects. Should it be used for anything else, it would. The council would not be required to undertake a detailed assessment, if this was purely employment land where members of the general public would not normally spend 1 hour or more at. However under policy ED1A there could be ancillary retail on the site, so we should write a developer requirement to exclude any retail or other use where members of the general public would normally spend 1 hour or more at this site for air quality reasons, and to highlight the air quality concerns. With regard to proposal to support a mixed use element including residential this is not possible for air quality reasons but also it is not considered to be an appropriate/sustainable location for this form of development. We note that the site has been marketed for some time and we do appreciate the challenges of this site and its location. However these are also challenges for the planning authority as the site lies remote from any settlement, and unfortunately neighbouring activities (poultry farms) also limit its suitability for certain uses.

Through the preparation of the current adopted Plan it was agreed that the smallest settlements were adequately covered by the Housing in the Countryside policy and did not therefore require to have a boundary identified. Generally, those settlements with less than 20 houses and no facilities do not have a boundary. It is recommended that we continue with this approach.

With regard to the LDP settlement boundaries in Kilmagadwood, Scotlandwell it is considered that these should be retained as per the existing LDP as they serve an important role in separating the two settlements and providing the landscape setting to Scotlandwell and its conservation area.

With regard to Glenlomond, there is planning application 16/00751/FLL for the erection of 13no. dwellinghouses and associated works that was given planning permission. The advice from our Road and Transport colleagues (with sight of the same report) confirms that "the proposed development will not generate a significant increase in traffic, such that the existing road network would be unable to accommodate the extra traffic." I can confirm that the settlement boundary for Glenlomond is drawn tightly to the existing settlement envelope, and that the recent proposal for 13 homes represents the substantial development opportunity here, with limited opportunity elsewhere. This suggests that there is no reason to identify a capacity for Glenlomond and any further small scale proposals can be considered on their merits. A statement to acknowledge the limited scope for further development and the capacity of the access has been added to the settlement statement.

The TAYplan spatial strategy allows for development in non-tiered settlements where this can be accommodated and supported by the settlement, and in rural areas, if such development genuinely contributes to the objectives of TAYplan and meets specific local needs or supports regeneration of the local economy. Proposed settlement boundaries alterations and sites have been proposed to us and are reviewed as follows:

- With regard to proposal at Carnbo there is no particular need for more opportunities to be identified within this plan period and there are already limited opportunities on infill sites within the settlement boundary including permission for 4 homes immediately to the east of this site (granted to Caledonian Trust PLC), and a permission for 5 houses in the southern

part of the village. The scale of development would not integrate with the community and there are doubts as to whether a suitable drainage solution can be achieved. It is therefore recommended that this further proposal by the Caledonian Trust PLC is resisted. It does lie within the Ochil Hills Special Landscape Area which infers extra landscape/settlement form/design sensitivity.

- The open space designation of land west of Cairnwell is considered to be of general amenity value and its proposed development would not be contained by any natural feature. Any proposal to develop this land would impact on the character and amenity of this area, making it feel more suburban and less rural, and therefore it is recommended that it should be retained as open space/ important amenity land.
- With regard to the proposal for inclusion of land at Bishop Terrace into the Kinnesswood boundary (with an agreement to transfer 6 hectares of hill ground to the community if the site is supported through the LDP) it could provide an opportunity for the community to enhance the amenity and use of the wider hill ground that is being offered. The proposed development site lies within the Loch Leven and Lomond Hills Special Landscape Area, there is some medium risk of surface water flooding on the southern edge of the site, and the Bishop Hill SSSI lies immediately to the north. It is considered that this proposal is best assessed as a planning application with the benefit of the full details of the proposal and community response.
- With regard to the proposal for residential development at Fossoway Glebe it is considered that this proposal does not demonstrate that it meets specific local needs in terms of delivering significant public benefits. Also it is considered that access to the site would be difficult and would probably require a new junction from the A977 (as Church road would require significant upgrades which we are not sure would be possible). The location on the A977 for an access looks to be a bit awkward in terms of visibility and levels and an assessment would need to be made on this to determine the viability of this proposal. There are also landscape and visual settlement form impacts associated to this proposal, and potential for odour nuisance from the nearby sewerage works. It is recommended that this proposal is resisted.
- With regard to the proposal for land to the east of H54 in Scotlandwell it is considered that this proposal does not demonstrate that it meets specific local needs in terms of delivering significant public benefits, and the scale of development taken together with H54 is not considered appropriate for Scotlandwell. The landownership of H54 and the proposed extension are different so the proposal to reduce the density of the H54 site is unlikely to be well received by that landowner. The proposed 17.6 houses per hectare on H54 is not a high housing density even in a village context, and the LDP already provides a suitable restriction on height of proposals to 1 and a ½ storey development (which is appropriate as there is a slight drop in levels from the single storey housing on Friar Place). There is already a requirement for open space to be delivered in association to the existing H54 allocation and if the Council were to support an enlarged site with no increase in overall capacity then the density would not be appropriate to delivering the mix of house types sought. The capacities identified in the LDP are purely indicative so if a larger site is supported there would be pressure to accept more housing. It is recommended that this proposal is resisted.
- With regard to proposal to allocate land to the north of Rumbling Bridge it is considered that there is a landscape impact, and impact on the gorge associated to this proposal and it should be resisted. It was previously resisted by the Council in the last LDP and this position was supported by the Reporter. This site to the north of the nursing home was considered by the David Tyldesley and Associates Landscape Capacity Study which identified this area of land as a sensitive edge to the settlement with important landscape features or views beyond. The conclusion of this report states that 'Development of the open field in the village north of the nursing home would (be) inappropriate' identifying both landscape

constraints and development not being consistent with the settlement pattern. The Reporter in considering this site concluded that “Its development for housing, even at a low density, would detract from the attractive rural character of the village, and is unnecessary having regard to the other opportunities for infill development within the settlement boundary.” It is recommended that this proposal is resisted.

A smaller revised proposal associated to the A823 with some potential community benefits including a gorge carpark, a play area, interpretation board and shelter and a footpath connection to the gorge footpath. This was consulted on in February 2017 as part of the Additional consultation on 3 Kinross-shire sites. Although there are lesser landscape impacts associated to this revised proposal there are still residual landscape impacts and it is considered that there are already sufficient infill opportunities within Rumbling Bridge. A public consultation was carried out February 2017 to inform the Proposed Plan. There was a mixed response. From within Rumbling Bridge itself the comments were generally not in favour of the proposal. The landowner of the revised proposal submitted a comment to the consultation to clarify that they would deliver on discretionary benefits and commit to putting these in place ahead of any permitted development. The principal reasons given for objecting were as follows: the pace of recent development; and impact on the character, amenity greenspaces and setting of the gorge and the village. Other commonly mentioned issues include a perceived failure to secure community benefits for other proposals (gorge car park on Thomson home’s recently developed site directly opposite the current proposal on the other side of the A823), and traffic concerns. Please note this public carpark for the gorge is in the process of being delivered; however the access was changed as a non-material variation of the planning permission from being accessed directly off the main road to instead being served off the access for Braehead Chalets. There were also a lot of supportive comments, 38 in total, of which 30 came from residents outwith Rumbling Bridge. This perhaps reflects the popularity of the proposal for another carpark for the gorge (likely to be of more benefit to people visiting the village). Overall it is considered that this revised proposal should also be resisted for its landscape and character impacts. It is considered although this is a much better proposal than Rumbling Bridge 1, the remaining issues/impacts associated with the revised proposal are not outweighed with the potential benefits and it should be resisted. For the Council there are also challenges and risks associated with many of the potential benefits (car park, play area, interpretation board and shelter) because the proposal is unlikely to require them, and meet tests in circular 3/2012. A change to the settlement boundary has been made to include land here as open space.

- With regard to the proposal to identify land for housing to the east of Scotlandwell this proposal would have a negative impact on the character of the village, and its conservation area and promote ribbon development and should be resisted.
- With regard to proposals at Hatchbank proposal, this lies within the wider countryside, and is best considered under the LDP housing in the countryside policy. Amongst the other considerations the scale of any proposal here would need to be in line with the policy.
- With regard to proposals for Perth and Burleigh Road, Milnathort and OP15 Kinross, these are considered fully under Q34, but are resisted, whilst proposals for Blairingone are considered in relation to Q35 and Q36 and are partially supported.
- There were some proposals submitted at the CFS stage which were not of a scale or significance to require assessment through the MIR, but need to be considered in terms of whether they merit settlement boundary changes in the Proposed Plan. Sites were submitted for a single plot at the north end of Maryburgh, and on open land between Keltybridge and the farm building. The former lies immediately north of the current boundary and is contained to the north by a track. There are no particular sensitivities or constraints on this site. The proposal fits with the pattern of linear roadside development

and would be a natural conclusion being bounded by the track to the north however there are already sufficient infill opportunities without extending the boundary. The proposal to develop open land between the housing at Keltybridge and the farm buildings is also resisted because of the current amenity this brings (identified in the old Kinross Area Local Plan as village setting). Also the land provides useful separation between farm operations and the residential area of Keltybridge. There is also the B listed Dullomuir House opposite whose setting would be affected by this proposal.

Question 33:

Do you agree that the preferred option (Map x) for Kinross and Milnathort should be to remove E19 allocation (Map 28)?

Yes/No

Please briefly tell us the reasons why

KEY AGENCIES

SEPA agree with the removal of E19 (with regard to issues within their remit).

OTHER COMMENTS

There are a few respondents who support the preferred option of removing the E19 allocation for unstated or flood risk reasons. However the majority of respondents feel that it should remain in the Local Development Plan or that there should be a full appraisal before doing so, reasons given include: need to take a longer term perspective and need to protect for employment uses rather than lose it to housing; the potential it has for improvement to the link directly to the M90; and there was concern that this would mean protecting remaining employment land with the case made on behalf of Adam Neilson that his employment land allocation is not suitable for employment use due to prohibitive costs and because the range of uses is constrained by nearby residential.

Cllr Barnacle states his opposition to development west of the M90 whilst remaining sites within it are underdeveloped but considers there is opportunity to clarify the retention and status of Turfhills Roads Depot. Also the Turfhills site is suggested by the developer and landowner who consider that this site could provide an enhanced gateway for visitors, and the local community incorporating a mix of commercial and employment uses with shorter term potential around the motorway junction and longer term potential to expand.

COUNCIL RESPONSE

No evidence was submitted to the MIR, or Action Programme updates, to prove effectiveness of E19. However the ownership details have recently changed. The Forth Wines part of the E19 site is now owned by Inverarity Morton, and the majority of the remainder of E19 is owned by Dan Ramsay & Son Ltd. Given the public support, and the change in ownership further opportunity should be provided to bring forward the E19 allocation.

Whilst there are doubts about the effectiveness of this proposal, it is not being relied upon. Land within OP16 and to the south of the warehouse within E19 did benefit from PIP permission (approved by council contrary to officer recommendation) for solely residential development which ran out 12.11.2016. The reason to identify or support this residential opportunity within the employment allocation E19, and a solely residential proposal within OP16 to the south of Forth Wines (to help fund relocation of Forth Wines), contrary to the current LDP has gone. It is understood that the current planning application for this site is no longer proposing to enable

relocation of Forth Wines employment within the area with the potential economic benefits this might have brought. LDP support for employment uses on E19 and OP16 should remain with the remaining land at Op16 subsumed within a larger E19 allocation, but for employment uses. The triangle of land to the south which was proposed in the MIR for removal from the LDP as it is considered to lie within the functional flood plain has also been removed from the Proposed LDP2.

Turfhills Roads Depot could come forward on its own for redevelopment as a brownfield site. With regard to the larger developer proposal further employment land here is not required, and accessibility, timing, viability/deliverability, landscape and other issues remain. Adam Neilson's land is considered appropriate for employment land (as detailed under response to Q32). With regard to protecting land within E19 to secure a southbound exit to the M9 this has been reflected in the map and settlement statement for Kinross and Milnathort but the line of the junction improvements will not affect E19.

Question 34:

Do you agree that the preferred option for Kinross and Milnathort should be to continue with the existing allocations but remove OP15 (Map 29) and the part of OP16 (Map 30) which lies within the functional flood plain?

Yes/No

Please briefly tell us the reasons why if you think the alternative option to support housing development on OP15 (Map 31) Lethangie next to the Loch Leven Community Campus should be pursued please briefly indicate your reason?

KEY AGENCIES

SNH support the strategy of locating main development within tiered settlements. In terms of the draft developer requirements (if the alternative option of allocating for housing is pursued): SNH welcome those which are consistent with HRA; Historic Environment Scotland welcomes those relating to archaeology; and RSPB also welcome these but consider the Loch Leven SPA Supplementary Guidance should be highlighted.

With regard to the proposed change for Op16 SNH mention that this extension extends towards the river north Queich to west and this will require assessment through HRA. **SEPA** agree with the preferred option but consider that any detailed application that came forward would need to incorporate appropriate mitigation measures to ensure development was not at flood risk and that risk elsewhere was not increased which would have an associated land take. Therefore SEPA seek a developer requirement that acknowledges that not all of the site will be developable.

SEPA also require that site E35 is removed as an allocation from the plan due to the close proximity of the site to the adjacent large poultry farm but this is further detailed under Q32.

OTHER COMMENTS

Comments regarding OP15 were generally in favour of the preferred option of it not being allocated for educational purposes. The Kinross Civic Trust and Cllr Barnacle support the preferred option because of concern about potential loss of good agricultural land. However Kinross Community Council are concerned that the Council is not planning for the longer term, with the capacity of the new school considered only sufficient for the next 10 years growth and doubts about the life span of Milnathort primary school, therefore they would rather see the site safeguarded for education as a precautionary approach. The Kinross Community Council considers that need for flexibility and

choice is overstated since Persimmon is only a preferred bidder on the High School site and their Lathro planning application has yet to be determined. They consider that rather than identifying more sites, if backstop dates are not met by the developer on one or both sites then the deal should not be extended but released to other developers.

Comments regarding OP16 are generally in favour of the preferred option to amend this allocation to exclude the area at risk of flooding, and to respect the planning permission by taking in part of the existing E19 site. Persimmon the developer at Lathro considers that any shortfall could be made up on the Lathro Farm H47 with a current planning application (15/0152/FLM) under consideration.

Cllr Barnacle and Kinross Community Council support the retention of the West Kinross site (H46 from Proposed Plan Local Development Plan, January 2012) as public open space.

In terms of support for the alternative option to allocate Op15 for housing a representation was made on behalf of the landowner/developer interest. Principle reasons given for supporting this surround the flexibility and choice this could provide and reducing reliance on a single developer. It is suggested that this site could be developed within the next 5 years and is effective and free of specific constraints, as well as being well located for the Community campus, other services and public transport. Their submission includes various supporting reports including: a Design and Access statement; a Flood Risk Assessment; Landscape and Visual Appraisal; and Archaeological desk-based assessment.

Comments made regarding OP16 are generally in favour of the preferred option, however one respondent considers that it should be kept as employment land to provide flexibility and choice and considers there to be an adequate housing supply.

There were some additional sites suggested by landowners/developers:

- Land at Turfhill and Mawhill Farm proposed as an opportunity for residential, community facilities and employment land.
- Land at West Kinross proposed for housing (H46 in LDP1 proposed plan) as it is suggested it better relates to the existing community; and could deliver significantly enhanced play provision for the benefit of the town and wider community. It is clarified that the site currently offers no publicly accessible public open space. It is suggested that the Reporter misdirected himself (when he considered that it is likely that engineering works to form a new estate road would have a detrimental effect on the amenity and function of the park) which he himself regarded to be of fundamental importance to his assessment. It is suggested that the Council was aware that there was no need for access to be taken through the park (as clarified the technical submission to Examination by SKM) and an earlier access proposal adjacent to the park is being further explored;
- Residential development is proposed at the current LDP Employment land at South street, Milnathort with the case made that a brownfield site should be considered before a greenfield (OP15). It is suggested that the current use for class 5 here is incompatible with nearby residential area.
- The Perth Road and Burleigh Road Milnathort sites if allocated would add flexibility and a range and choice of sites. It is suggested that the Council, as part of the LDP1 MIR assessment considered these sites to be well located, accessible and effective housing sites. Further details on these sites were submitted to the Call for Sites stage.

General comments made include BP's desire to see references to the HSE consultation zone carried forward into the new LDP. Another respondent considers that there is a need to safeguard any land required for possible improvements to junction 7 on the M90.

COUNCIL RESPONSE

The Education department indicated that they have no requirement for the OP15 land as they have sufficient capacity in the Kinross and Milnathort primary schools to cope with projected demands, and therefore it is not advisable to keep allocating OP15 for education purposes.

It is noted that Persimmon have secured planning permissions on both the Lathro and former High School site, and a detailed planning application has been submitted by Dundas Estates and development, for Pacehill H49 in Milnathort. In the Kinross HMA there is no shortfall of housing land identified, and applications have tended to be approved for higher than the current LDP capacity figures. The Op15 site was identified in the MIR as a reasonable alternative option because of its proximity to facilities in Kinross; and because the woodland to the east provides a logical edge to the settlement. However there is no requirement for additional housing land and there is more than one developer making good progress, therefore it is considered that OP15 should be excluded from the settlement boundary, and removed as an allocation for education.

In addition to the lack of housing land need there are also other reasons to resist alternative proposals as follows:

- With regard to the West Kinross site (H46 from Proposed Plan Local Development Plan, January 2012) difficulties with proposals that came out in previous LDP regarding access and impact on park have not been resolved in current submissions as the proposed access still separates the housing from the park.
- Proposals for Turfhill are considered not to be appropriate (more detailed response given under Q33) and proposals in wider countryside locations such as at Hatchbank road are considered in response to Q32.
- Proposals for reallocating LDP employment land at South Street for residential are resisted. This site contributes to employment land supply/business opportunities and offers good starter/lower value business opportunity and should continue to be resisted.
- The proposals at Perth and Burleigh Road should also be resisted. These areas currently form part of the attractive landscape setting to Milnathort, with views across to, Loch Leven, the Lomond Hills and Benarty Hill and also in the case of the Perth Road proposal towards Burleigh Castle. With regard to possible land requirement for improvements to the junction 7 of the M90 this is indicated on the map and the settlement statement protects the line of the potential upgrade to M90 Milnathort junction 7 to provide southbound slips.

Question 35:

Do you agree that the preferred option for the wider Kinross-shire area (Map 32) is to identify a site in Crook of Devon at the junction of the A977 and the B9074?

Yes/No

Please briefly tell us the reasons why

KEY AGENCIES

Scottish Water note that the Drum WWTW and network are part of an ongoing investigation and should growth be required in the LDP then Scottish Water will ensure it is considered.

SEPA suggest that text should be updated to acknowledge that there is limited capacity in the WWTW and that Scottish Water are undertaking a growth project, and note that Scottish Water are already progressing a growth project for Drum. SEPA welcome the proposal in terms of increasing

development outwith the Loch Leven catchment. SNH are also generally supportive as it has potential to connect to the ribbon development to the North east with the core of the settlement and embed the town in the surrounding woodland.

In terms of the detail of how it could be developed **SNH** consider that a sensitive design approach by LVIA and a masterplanning process with a wider blue green network, including sustainable drainage would be appropriate. The Flood team and SEPA inform that due to the small watercourse nearby a Flood Risk Assessment will be required in addition to the Drainage Impact Assessment. SEPA also suggest that a site specific requirement could be added to reiterate the requirement to connect to the public sewer and to require an appropriate buffer and retention of the open watercourse.

OTHER COMMENTS

There is a mixed response to the possible inclusion of this site for housing. Reasons given for supporting include: wider public benefit if developer requirements including the large roundabout can be delivered; if it could provide pavement improvements and traffic calming on the B9097 and a safe route to school from the village hall car park; preference for this site over the Monarch deer park site; and support as long as development does not exceed 50 homes and the design is sensitive.

Reasons given for not supporting or doubting its suitability include concern: that its allocation would undermine the strategy of TAYplan by identifying substantial development outwith a tiered settlement with suggestion that their client's land in Milnathort at Burleigh Road, and Perth Road would be better options; that it concentrates development in Crook of Devon rather than sharing around the villages; that additional traffic generated will make the roads more dangerous; concern about the scale of development in relation to the village; that it would essentially join Crook of Devon to the Drum and have a significantly adverse impact on the local landscape; that the benefits would be negligible with a roundabout not significantly effecting speed; that other lower cost measures would better address traffic speed; that the site has flooding/drainage issues; that it could technically drain into the Devon; and concern about the capacity of the primary school to accommodate demand from this development. Also G S Brown do not agree with the preferred option, considering their site known as the Naemoor Road site as a much better integrated with the villages development envelope.

Cllr Barnacle suggests that an employment site should be considered for Crook of Devon.

COUNCIL RESPONSE

The LDP requires to be compatible with TAYplan and its tiered approach to concentrating development on the principal settlements, and directing the majority of allocations to the main settlements, whilst allowing limited development in other areas. TAYplan advises that "LDPs can provide for some development in settlements that are not defined as principal settlements where this can be accommodated and supported by the settlement....provided that the development genuinely contributes to the outcomes of this Plan and meets specific local needs or supports regeneration of the respective settlement."

The proposal submitted by the landowner as part of the Additional Sites consultation in February 2017 included the roundabouts provision on the A977. However whilst the LDP can ask for it, there was a risk that even if this was identified as a requirement in the LDP, we would not be able to insist on its provision at the planning application stage. This is because the planning system only has certainty about delivery of what is required for planning purposes. Any proposed mitigation asked of a developer needs to meet tests in circular 3/2012 Planning Obligations and Good neighbour Agreements. These tests are:

- a necessity test (necessary to make the proposed development acceptable in planning terms);
- to serve a planning purpose;
- to relate to proposed development (either directly or from cumulative impact, there should be a clear link between the development and any mitigation offered as part of the developer's contribution - eg create a direct need for particular facilities. It further states "Planning obligations should not be used to extract advantages, benefits or payments from landowners or developers which are not directly related to the proposed development");
- scale and kind test (fairly and reasonably relate in scale and kind to the development);
- and a reasonableness test.

The proposed roundabout when assessed against these policy tests did not stand up well, so it is unlikely requiring this could be defended by the Council should a developer later challenge this. Particularly since the transport statement subsequently submitted to the Council clarified that the roundabout would not be required for this level of development. The other possible public benefit identified at MIR stage of improved drainage within the Loch Leven Catchment was also ruled out as Scottish Water confirmed that the site would drain to the Devon.

When the proposal was further detailed for the additional sites consultation February 2017 the possible wider public benefits proposed were widened to include employment opportunities through café farm shop, and there was a willingness to set aside and transfer land for class 4 business use to the Council; also it was proposed that Crook Moss would have public access improvement and be transferred to the community; and public parking for the Village Hall and for the Crook Moss were additionally offered. There were 53 objections to this proposal, and 26 supportive comments (of which 8 are qualified and would retract their support if it is only delivering the benefits the Council can definitely insist upon). There were also 6 comments which did not express a clear preference.

After this consultation a revised proposal was put forward by Members and is included in the Proposed LDP2. This proposal could potentially offer wider benefits to the village such as:

- additional parking capacity for the village hall
- providing land at Crook Moss as a community asset with waymarked footpaths, disabled access and woodland management plan
- enhanced footway provision between the site and the school
- market research into employment use and farm shop viability (if there is not demand then provision of land for additional car parking and or another agreed community use which would benefit the community)
- 50% affordable housing as opposed to the normal 25%

This revised proposal also involved replacing the roundabout provision with contribution to mitigation measures on the A977 whilst it restricts the capacity of the site to 30 homes (a reduction on the February 2017 proposal). SNH's suggestions for LVIA and a masterplanning process are accepted. Some of the concerns expressed about the impact of the proposal can also be addressed by the detail of the proposal; and the masterplan at the planning application stage.

The alternative proposal put forward for the Naemoor road site does not demonstrate that it would deliver significant wider community benefits and therefore should be resisted. With regard to the proposal for an employment site this proposal relates to land to the north of the railway line. It is unlikely to be the Council taking this forward in terms of servicing it, and so it would need to be developer led which would be challenging. In terms of SEA it is considered that this site has impacts on settlement form and other landscape and visual impacts. By taking development beyond the

railway line it takes development out on limb from the rest of the village, also it is unclear how this would be serviced with the adjacent road in private ownership. It is therefore considered this proposal should be resisted.

Question 36:

Do you agree that the preferred option for Blairingone should be to work with the community and landowners to develop a community plan to be adopted as Statutory Supplementary Guidance to replace the current Blairingone settlement section of the adopted Plan?

Yes/No

SUMMARY OF RESPONSES

The preferred option to work with the community and landowners to prepare a community plan that would be adopted as Supplementary Guidance to replace the current Blairingone section of the adopted LDP is supported by most of the respondents. The reasons given for supporting this include: to allow organic growth; so that the community are involved and it takes account of local interest; and so that it is supported by the majority of the community.

The landowners Johnny Stewart and Knowe properties do not support the proposal, the reasons they give include that: the intention is for the landowners to work with the community to develop proposals which meet the aspirations of the village and dialogue with the community is ongoing; a traditional plan led developer approach will achieve the desired outcomes; the novel approach proposed is unlikely to facilitate the level of change necessary.

The landowners Johnny Stewart and Knowe properties suggest that the H74 existing allocation is effective (ground stability issues not a barrier) but that an extended allocation to include land to the south would: bring development of a scale to support local services, including the primary school; provide affordable housing; allow a sufficient critical mass to enhance development viability and marketability; bring additional amenity benefits including enhancements to open space and play facilities; and is an opportunity to consider solutions to local transport issues; bring unity and establish an improved settlement edge to the village; and not be of a scale to be seen as significant in the wider Kinross HMA context. An indicative Development Proposal has been prepared this includes a proposed layout that would accommodate the following: neighbourhood store; village hall and community space/hub; a high quality built environment and open spaces; traffic calming and safe routes to school through potential new crossing points along the main road.

COUNCIL RESPONSE

This site was consulted on as part of the additional sites consultation in Kinross-shire in February/March 17. The majority of the responses received were in favour of the proposal and this has influenced us.

The two landowners here propose to work together and expand the allocation onto land to the south of the A977. This is reasonable in terms of it being a good site for development. However the scale of both sites together is not appropriate within the timescales of the LDP and would undermine the spatial strategy of TAYplan and the LDP. There is also some scepticism that the level of development proposed is viable and attractive to mainstream housing providers or that it could deliver all the benefits (in terms of a village hall, and neighbourhood store) envisaged in the landowner's submission. It is however conceded that the LDP could provide some additional

flexibility as to where development could happen. Although the H74 housing site was identified, due to concerns over ground stability as a result of past mine operation, the site was not considered to be effective. Further evidence suggests this position is correct and the site is unlikely to be viable.

The H74 could therefore be expanded to include additional land to the south, however H74 should state that 30 homes is a maximum for the LDP period and it should be made a mixed use allocation to allow opportunity for other uses such as community and small scale retail to come forward. This will ensure that the scale of development is contained to appropriate for Blairingone and something which will not undermine the wider Kinross area spatial strategy. The expansion of the housing allocation allows progress if a mainstream developer is interested. However the traditional developer approach may not yield the desired results and more novel approaches could be explored. These may include the provision of self-build serviced plots, small holdings, and perhaps the application of the new Community Empowerment legislation for a community lead project. A more flexible approach to delivery could be explored through a Community Plan, however, to ensure compatibility with the TAYplan strategy the level of development allowed for will need to be broadly in line with current aspirations.

Both approaches require the community/or landowners here to be proactive and creative, and Proposed LDP2 provides greater flexibility than the existing LDP and opportunity for either types of proposals to progress whilst ensuring any proposals comply with the LDP Kinross spatial strategy. It is considered that the Proposed LDP2 provides a flexible framework and there is no need to prepare Supplementary Guidance as different approaches can be accommodated.

Question 37:

Please briefly tell us the reasons why, particularly if you think the alternative option of retaining the existing LDP position for Blairingone should be pursued?

SUMMARY OF RESPONSES

Some of the respondents who agreed with the preferred option have reiterated this preference because of the perceived benefits already stated under Q36 that this approach would bring and also because it is considered this will best protect the character of the village.

The landowner Mr Johnny Stewart and Knowe Properties restate that they do not support the preferred option for the reasons already stated under Q36. They consider that the Council's preferred option seems to be largely based on concern about the effectiveness of development so they instructed a desk-based Site Investigation Report to consider the development potential across the combined site, taking into account the potential for any geotechnical, mineral and/or environmental constraints to development. The conclusions of the report are that, given the past use of the site, extensive fill materials are likely to be present and piling may be necessary to support future residential development. Overall, they consider that the Report certainly does not preclude development on either section of the combined site. As such, they consider, both the existing H74 allocation and proposed additional allocation to the south can reasonably be described as 'effective' in relation to ground conditions. In terms of the 'marketability' it is considered that the allocation of the combined site could allow a critical mass sufficient to enhance both the viability and marketability of developing within Blairingone and improve its attractiveness to both mainstream housing developers and commercial operators as confirmed by initial market testing.

COUNCIL RESPONSE

Please see response to Q36. With regard to the critical mass of the proposal, we understand the difficult position for the landowners, but we do not wish to support a level of development which would undermine the spatial strategy of the Kinross area and create an unsustainable level of growth for Blairingone (in relation to the services and employment opportunities available locally). The level of wider public benefits proposed by the landowners is ambitious particularly given the abnormal costs involved due to ground conditions on the site. It is therefore unclear whether these benefits, particularly the village hall and neighbourhood store could be delivered.

Question 38:

If you wish to see changes made to the boundary of any of the towns or villages within the Strathearn Area, please indicate which settlement and provide details of the change you think should be made.

SUMMARY OF RESPONSES

In terms of changes requested to Strathearn settlement boundaries, there were thirteen specific changes suggested and two requests for a generally flexible approach to be adopted without specific changes in mind. These are detailed below:

In Crieff, there were three amendments to the settlement boundary suggested. These were Drummond Estates' suggestion for a 2.4 ha housing site at Alichmore near Bridgend; Ben Challum's suggestion for a 7.7 ha housing site on two fields south of Dollerie Road on the eastern approach to the town; and Robert Simpson & Son's suggestion for a reconsideration of a 3.2 ha site at Laggan Road.

In Auchterarder, there were two amendments to the settlement boundary suggested. These were Muir Homes' suggestion to significantly expand the settlement northwards towards Gallowhill and Castlemains; and Stewart Milne Homes' suggestion for a 6 ha housing site at Ruthvenvale Mill and adjacent agricultural fields.

In other Strathearn settlements, there was a suggestion to amend the settlement boundaries at Comrie at Tomperan, and at Fowlis Wester to include a new site outside the conservation area for around 40 houses; a suggestion at Gleneagles to include land east of Firhill; three suggestions for amendments at Muthill at Dalliotfield, Golf Course Road, and Station Road; and suggestions for extensions to the settlement boundaries at New Fowlis and St Davids.

All of these suggestions for amendments to settlement boundaries have been previously submitted, except the one at Fowlis Wester that is new, but all will be given fresh consideration.

Comments from Key Agencies included a fresh call for any settlement boundary changes to be considered against the historic character of settlements and any designations that may be affected, while Network Rail wishes to reserve its position pending further work into the potential for passenger and/or freight facilities at Blackford.

COUNCIL RESPONSE

The suggested boundary changes will be assessed in terms of SEA and application of TAYplan spatial strategy and policies

Recommendation: No boundary changes have been identified as a result of suggestions at Main Issues Report stage

Question 39:

Do you agree with the preferred option to promote a Simplified Planning Zone Scheme to widen the types of uses allowed at the Cultybraggan Camp to include community and employment uses?

Yes/No

Please briefly tell us the reasons why.

SUMMARY OF RESPONSES

While this issue attracted only five responses, there is support for allowing Cultybraggan Camp to develop in a way that best suits the community's interest while protecting and enhancing the historic environment at the site. Both Historic Environment Scotland and Comrie Community Council welcome the opportunity to contribute to the SPZ drafting. SEPA raises concern that the site is adjacent to an area at risk of flooding. While the site is elevated above the nearby Ruchill Water there is a history of serious erosion and a Flood Risk Assessment and Drainage Impact Assessment would be required.

COUNCIL RESPONSE

The Comrie Development Trust, as main land owner, would be the key stakeholder involved in taking forward the suggested designation of Cultybraggan Camp as a Simplified Planning Zone. While there is support for the principle of developing Cultybraggan Camp in a way that best suits the community's interest while protecting and enhancing the historic environment at the site, this has not shown that designation as a SPZ would be the best option. The policies in the Proposed Local Development Plan provide an appropriate and supportive framework within which the Cultybraggan Camp may continue to develop, while protecting and enhancing the historic environment at the site.

Question 40:

As a result of there being no shortfall of housing land identified, do you agree with the preferred option for more housing on the existing sites in Crieff (MU7 – Map 36) and / or on the Auchterarder (Development Framework sites on Map 37) ?

Yes/No

If not do you think the alternative option which is not to identify any additional allocations is best?

Yes/No

Please briefly tell us the reasons why

SUMMARY OF RESPONSES

There were only three submissions in support of the preferred option in Strathearn, one each from the joint promoters of the existing sites in Crieff, and one from the promoter of the site in Auchterarder. Several alternatives to these sites were suggested including: Crieff Smallholdings, land at Tomaknock south of Dollerie Road in Crieff, land at the former gas holder at Broich Road, Crieff,

land at Gallowhill and Castlemains in Auchterarder, and the possibility of redirecting development to many smaller sites instead of the larger ones. In terms of other suggestions, while it was suggested that Auchterarder lacks infrastructure, this was countered by the suggestion that the town has a better strategic position on the A9 and has greater housing demand. Development at Auchterarder would also make best use of the infrastructure investments such as A9 junction improvements. And one suggestion was received that housing allocations in all settlements should increase by 10%. Two Community Councils responded: in Crieff, the preferred option is unwelcome, especially as 104 houses remain undeveloped at Strathearn View, unsupported by substantiated evidence of demand; while Comrie Community Council sees no need for new housing allocations in Strathearn. The Key Agencies including Scottish Water, Historic Environment Scotland and SEPA support the preferred option; while SNH supports the alternative option first but would also support the preferred option if extra housing is needed.

COUNCIL RESPONSE

The suggested sites will be assessed in terms of SEA, TAYplan spatial strategy and policies. There is capacity within the existing allocations in the tiered settlements to accommodate additional housing numbers. Several of the suggested alternatives are on greenfield land, some of which is outwith settlement boundaries. Development at Auchterarder remains the best option in the Strathearn housing market area because of its strategic position, highly accessible location on the trunk road and railway line, and availability of allocated housing and employment land within the existing settlement boundary. The large mixed use allocation MU7 in Crieff is also able to accommodate an increase in housing numbers, and the town also has capacity within another housing site at Strathearn View where development is not yet complete. In this context, the other suggested options, particularly outwith settlement boundaries or the tiered settlements, are not promoted.

Question 41:

If you wish to see changes made to the boundary of any of the towns or villages within the Strathmore & the Glens Area, please indicate which settlement and provide details of the change you think should be made.

SUMMARY OF RESPONSES

There were requests for boundaries to be reviewed in the following settlements within Strathmore and the Glens area: Craigie, Kettins, Kinloch, Rattray and Meikleour. There were also numerous requests for the open space designation surrounding private properties and covering private garden ground in Rosemount to be reviewed and a more consistent and fair approach to be applied.

KEY AGENCIES

Historic Environment Scotland emphasised the importance of protecting the historic character of settlements should boundaries be reviewed.

Craigie

Boundaries are not correct; does not include gardens or spaces belonging to some houses (no specific changes identified)

Kettins

Two boundary changes proposed at MIR stage, one to the east and one to the west.

Kinloch

Three alternative boundaries proposed to the existing settlement.

Meikleour

A boundary change was suggested at pre-MIR stage which would have resulted in a large extension to the existing settlement. The potential for adverse impact of this extension on the historic character and setting of the village was considered too great and the proposal was not supported at pre-MIR stage. However, a smaller area is has instead been identified.

Ratray

A site was proposed at pre-MIR stage at Westfields of Ratray.

COUNCIL RESPONSE

The TAYplan spatial strategy allows for development in non-tiered settlements where this can be accommodated and supported by the settlement, and in rural areas, if such development genuinely contributes to the objectives of TAYplan and meets specific local needs or supports regeneration of the local economy.

Craigie

The settlement boundary at Craigie has been reviewed and is believed to be correct. No specific alternative boundary was suggested. It is therefore not proposed to amend the boundary in the Proposed Plan.

Kettins

There are limited services and facilities in Kettins and the proposed boundary change to the east has the potential to create a sizeable extension to the settlement. Approximately half the area is at risk from flooding. Amending the settlement boundary to include the western area would cut across the corner of a field and would not result in a logical boundary. It is not proposed to amend the boundary in the Proposed Plan.

Kinloch

Option D (the largest proposed boundary) runs the risk of undermining the overall spatial strategy of TAYplan to direct the majority of growth to the largest settlements. Although only part of the area is proposed to be allocated as a housing site, the inclusion of this whole area within the settlement boundary could imply that development in any part of this area could be acceptable in principle. This area was also was promoted for development through the last LDP but was dismissed by the Reporter due to concerns that the scale of development would be out of keeping with the character of the small settlement and would be contrary to Plan policies to protect the Special Area of Conservation.

Option C is also considered too large an extension to the existing settlement and would also risk undermining the TAYplan strategy. Option B is the smallest of the three boundary amendments suggested, however, it would still be a sizeable extension to this small settlement which has very little in the way of services or facilities. It is therefore not proposed to amend the settlement boundary at Kinloch in the Proposed Plan.

Meikleour

The settlement boundary at Meikleour is purposefully drawn tightly to limit future growth. The potential impact of the site proposed at pre-MIR stage was too great; however, the identification of

a smaller area would allow an appropriate amount of additional development whilst protecting the character of the village. It is therefore proposed to amend the settlement boundary at Meikleour to include a small additional area to the east.

Ratray

The inclusion of the site at Westfields of Ratray as an allocation will give the opportunity to develop the brownfield site which currently has a detrimental effect on the landscape when approaching Ratray from the north due to its state of disrepair. It is therefore proposed to include this site within the settlement boundary in the Proposed Plan.

Rosemount, Blairgowrie

Various representations were received from homeowners within the area who believe the current open space boundary is unfair and inconsistent. The open space area in Rosemount has been reviewed to ensure the open space designation is fairly applied to each private house and garden ground, ensuring consistency.

Question 42:

Do you agree with the idea of expanding the current playing fields (Map 38) in the open space area at Rosemount?

Yes/No

Please briefly tell us the reasons why

KEY AGENCIES

SNH has concerns over the justification for further open space provision in the area due to the lack of an open space audit and strategy to support the LDP. However they support this area remaining as open space to maintain the character of Rosemount and using this area for recreational purposes would be beneficial to the health of residents and the character of the area.

SUPPORT

There is a lack of leisure and recreation facilities in Blairgowrie and the current provision is not fit for purpose. The majority are in favour of expanding the existing playing fields at Rosemount, to provide open space but to also ensure the semi-rural nature of the area is protected against built development. The area has access issues and some question the compatibility of playing fields with a cemetery (Rosemount is also the preferred option for a cemetery in Blairgowrie). Improved leisure and recreation facilities could be provided in this location, and not just limited to playing fields.

COUNCIL RESPONSE

The Council supports this area remaining as designated open space, ensuring the semi-rural characteristics of the Rosemount area. However, a new recreation centre is now proposed for the town at Blairgowrie High School. On this basis, no specific proposals are included for the open space at Rosemount. Plan policies would, however, allow for any extension or improvement of the playing field provision within the allocated open space at this location. Access to the allocated open space at Rosemount is also planned to be improved from the school campus, with a permanent road being put in place through site H64.

With regards to the omission of an open space audit which was raised by SNH, Community Greenspace and the local Community Council understand there is a deficiency of sport facilities in Blairgowrie and Rattray which is confirmed by the Leisure Needs Analysis data and surveys carried out by the Community Council.

In relation to the location for a potential new cemetery, the Eastern Expansion area is now the preferred site for this and it is proposed to identify an area of search within this site in the Proposed Plan.

Question 43:

Which of the options would you consider to be appropriate for additional cemetery provision (Map 40)?

Please briefly tell us your reasons why. Please briefly tell us the reasons why

KEY AGENCIES

SEPA could not state a preference due to the lack of information and investigation that has been carried out on the sites. Cemeteries can have a detrimental impact on groundwater and should a site be identified before investigations are carried out, this must be stated as developer requirements and it may turn out that the site is unsuitable for such a use. Again, SNH believes this cannot be justified without an Open Space Audit and Strategy, but would support a new cemetery going in the open space area at Rosemount.

OTHER COMMENTS

Proposed cemetery in Rosemount

Six supportive comments were received for new cemetery provision to be located within the open space area at Rosemount, securing the area from built development. However there were some issues raised with the compatibility of the playing fields and a cemetery in terms of noise and that the close proximity to playing fields may not provide a tranquil cemetery setting. There have also been comments received on the current access and that an access using Piggy Lane is currently not fit for purpose.

Proposed cemetery within Blairgowrie Eastern Expansion

Nine representations were received that supported a new cemetery within this proposed strategic housing site to the east of Blairgowrie, by the Parkhead Road and Coupar Angus Road junction.

Proposed cemetery at Heather Drive

Numerous residents close to this proposed site were not supportive of a cemetery in this location due to access issues and the increased traffic which would be generated on this private road should a cemetery be located here. There were however three supportive comments for this location due to the peaceful and tranquil setting.

OPPSOTION TO PROPOSED SITES

Nine representations supported none of the proposed options and instead either supported an extension within closer proximity to the existing cemetery – either within LDP site H64 or MU5 as this was a more logical way to expand the existing facility.

COUNCIL RESPONSE

It is highly unlikely that an extension to the current cemetery could be facilitated, due to constrained surrounding land uses. Site H64 lies to the east of the current cemetery and is allocated in the current LDP for housing. Likewise MU5 to the west of the A93 (Perth Road) has also been allocated as a mixed use site and a masterplan is currently being progressed for this site. In response to SEPA, we will not proceed with the allocation of a cemetery site until groundwater investigations have been carried out, which will be the next step in the process and Community Greenspace will be responsible for this. An area of search has been identified within the Blairgowrie East Expansion site due to identified constraints with the other two options.

Question 44:

Do you agree with the preferred option for a wider eastern expansion for Blairgowrie (Map 41); an extension of H64 (Map 42); redevelopment of Brownfield Land at Westfields in Rattray (Map 43); and inclusion of Annfield Place in Alyth (Map 44) to a generous and strategic housing land supply for Strathmore and the Glens?

Please briefly tell us the reasons why

This question deals mainly with the proposed inclusion of Blairgowrie Eastern Expansion (BEE) site as a long term strategic option to satisfy housing numbers in Strathmore and the Glens. The majority of respondents were against the inclusion of this site. Eleven respondents did support the site and a further eleven were unsure and suggested alternatives.

KEY AGENCIES

Scottish Water notes that Blairgowrie Wastewater Treatment Works will likely need a growth project to accommodate some or all development. SEPA agree with the preferred option although unsure there is a need for a Flood Risk Assessment at BEE. Support for including a Drainage Impact Assessment for all of the proposed sites. Historic Environment Scotland emphasise the importance of the Ardmuir Pit Setting scheduled monument and would like the developer requirements to clearly set out the parameters for the protection of the site and setting. However they have stated that development within the scheduled area of the monument would require scheduled monument consent and believe this is unlikely to be granted.

SUPPORT

The representations which supported BEE were in favour of the fact that a large scale site would provide certainty for the future and allow infrastructure to be well planned for and incorporated from the outset. There was also support for the preparation of a joint masterplan between all sites and landowners involved, which should be led by Perth and Kinross Council using the findings from the recent charrette held in Blairgowrie.

OPPOSITION

Those that did not support BEE had various reasons. The site is deemed to be very exposed and not particularly well contained within the existing landscape; the approach to Blairgowrie from the south

would be completely changed. There is also support for redeveloping brownfield land as opposed to this greenfield land which is in active agricultural use. Rattray in particular could benefit from brownfield regeneration (sites were suggested at Haugh Road, McDonald Crescent, Ashgrove Road and the River Etricht).

An overarching theme for those opposing this proposal was that it is beyond what is required in terms of housing numbers and there is no demand to evidence that this amount of housing is required – over provision before demand has developed. It was suggested that Blairgowrie has a history of smaller and/or single development and a variety of smaller sites would be more acceptable in the town. This also links in with the fact the smaller sites (the alternative option) provide sufficient capacity to meet the housing land requirement so there is no need to identify this large scale site.

With regards to services, there are concerns that if the eastern expansion went ahead, Blairgowrie would become congested and services will fall behind demand. There are also concerns about the lack of employment opportunities in the town and how more houses will only contribute further to Blairgowrie becoming a commuting town.

There were concerns about flooding in part of the site, particularly the top field. There would also be interference with Red Squirrel and various bird populations as they use the access route along the narrow belt of trees running up the north side of Parkhead Road.

The proposal shows an indicative link road, which raised concerns that it would require an intersection with Parkhead Road, increasing traffic on a narrow road, and also generating extra traffic along Golf Course Road which is already overused. It was also suggested that this would create a town centre bypass, taking activity away from the town centre and having a detrimental effect on town centre business.

A solution of extending LDP site MU5 was suggested, which could accommodate the additional housing numbers with much less visual impact given the nature of the geography on the western side of the town.

COUNCIL RESPONSE

There were no significant objections from any of the Key Agencies for the allocation of Blairgowrie Eastern Expansion apart from Historic Environment Scotland (HES) who emphasised the importance of the on-site scheduled monument. HES would be consulted to ensure that the developer requirements and preparation of masterplan were sympathetic to the scheduled monument. Contact has already been made in relation to a draft development brief for the site where HES provided comments on how to approach development in proximity to the scheduled monument.

BEE provides a generous housing land supply for Strathmore and the Glens and allocating a large scale strategic site would provide certainty for the area for the foreseeable future; only part of the site (300 houses) will be allowed to be developed within the plan period. The site will be developed in a phased manner and will extend well beyond the life of the Plan. Development would progress when the market demands additional housing in the area.

With reference to the brownfield regeneration, we would encourage brownfield sites to be developed prior to greenfield sites. However, the scale of this strategic site would allow for improved community facilities to be incorporated within a wider masterplan and mean that infrastructure is well planned from the outset. The strategic site could provide additional

community facilities which would provide for new residents, as well as mitigate the impact of development on existing facilities.

SEPA do not foresee flooding as being a significant issue at this site and are unlikely to require a Flood Risk Assessment, stating that a Drainage Impact Assessment would suffice. The site specific requirements would provide further detail on this, as well as requesting biodiversity to be protected and enhanced.

The indicative link road shown on the map included within the Main Issues Report will be subject to a Transport Assessment to ensure the best possible route is established and will be agreed with the Council's Transport Planning Department.

An extension to the currently allocated MU5 (Western Blairgowrie) was suggested as an alternative to the BEE. The MU5 site is restricted, however, due to the close proximity of the Lunan Lochs catchment boundary which lies to the west.

Question 45:

Or do you think that the best alternative option for Strathmore and the Glens is to identify 3 of the smaller sites proposed in Blairgowrie (Map 42), Rattray (Map 43) and Alyth (Map 44)?

Please briefly tell us the reasons why

SUMMARY OF RESPONSES

The alternative option sought to include all three of the smaller proposed sites. Overall, there was more support for this combination of alternative options which excluded the large strategic Blairgowrie Eastern Expansion (BEE) as it is deemed to be more sustainable to have smaller sites with less of a burden on existing infrastructure.

Extension of H64 (Golf Course Road): There was a large number of people against the allocation of this site wholly due to the implications this would have on the Riding for the Disabled (RDA) facility currently located on the site. The RDA is a valuable community resource which has benefitted from a lot of funding in recent years. Should the site go forward, people would like to see the RDA re-located to an alternative central location. There were also concerns about the capacity of Golf Course Road.

Westfields of Rattray: There was support for the regeneration of this brownfield site, with the landowner expressing full commitment to the redevelopment. Concerns were raised over road safety, road capacity and associated access issues from the A93. There were also concerns over the lack of services and questioning if the site was in a sustainable location.

Annfield Place, Alyth: The only MIR proposal in Alyth received 5 representations in favour and 3 opposing. The landowner suggested that the site was free from constraints and the surrounding brownfield land at Mornity Steading could also be developed which would allow for a better access to the site. Those opposing the site believe that is against the TAYplan strategy, has flooding issues, would be a loss of agricultural land and that there is no demand for 100 new houses in the area.

COUNCIL RESPONSE

Extension of H64 (Golf Course Road): The loss of Riding for the Disabled facility (RDA) would be a significant loss to the community of Blairgowrie. Should this site be identified for development, an alternative location should be provided for the RDA facility. The landowner's agent (CKD Galbraith) has been in discussions with RDA and has confirmed that 'should this site be allocated there would be no intention to advance it without an appropriate alternative location being provided so that RDS could continue to provide their important services. The landowner for the site continues to hold a number of parcels of land in and around Blairgowrie, several of which would be suitable alternative sites for the charity's facilities'.

In response to the road capacity of Golf Course Road, proposed development on this site would be subject to a Transport Assessment to ensure there was capacity for additional traffic. Access from Golf Course Road would be one of three access points to the wider site of H64 (including this small 1.5ha extension) so it is worth noting that not all traffic generated from this development would be using the Golf Course Road access point.

Westfields of Rattray: The Westfields of Rattray site is a logical housing site and a good opportunity to redevelop brownfield land. A Transport Assessment would be carried out and junction improvements are likely to be required to ensure road safety on this stretch of the A93. Allocating this site would require a considerable extension to the settlement boundary of Blairgowrie and Rattray but considering the current state of disrepair, development here would improve the visual approach to Rattray from the north. Majority of the site also lies within a 400m buffer of the nearest bus stop, which makes the site largely accessible by public transport for sustainable links to the town centre and Perth.

Annfield Place, Alyth: Alyth is identified in TAYplan as a tier 3 principal settlement which means that it is expected to accommodate some growth. Annfield Place has since been subject to a Flood Risk Assessment to gauge the extent of flood risk within the site. This has shown that 25% of the site is subject to flood risk, but the wider site is suitable for housing development. Preferably the site should be re-graded and infilled, designing the site to ensure it fell to the west, eliminating surface water flooding on the northwest corner. A SUDS basin would also be required to ensure the existing outfall drainage patterns are replicated.

A statement has also recently been received from the Planning Consultant to emphasise the effectiveness of development on this site and the surrounding Mornity Steading. The whole site is under single ownership and could encompass redevelopment of the brownfield site (steading) to provide an improved attractive access from Airlie Street.