

Issue 42	Strathearn Area – Crieff	
Development plan reference:	Crieff, pages 166-172 Crieff settlement summary, pages 166-167 E26 – Bridgend, page 167 H57 – Wester Tomaknock, page 170 MU7 –south of Broich Road, page 171 MU344 – north of Broich Road, page 172	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
John Champion (0042) Alexandra Fraser (0045) Ben Challum Ltd (0107) Craig Finlay (0127) Drummond Estates (0151) Ms Fiona Walton (0400) Mrs Elizabeth Bell (0408) James Tainsh, Ralph Dargie & Irene Alexander (0424) R Simpson & Son (0425) Mr & Mrs James Tainsh (0433) Woodland Trust Scotland (0462)		Rory Stewart (0463) Miss L Jane Laird (0487) Simon Barnes (0493) Alan Moore (0495) James & Linda Holden (0529) London and Scottish Developments Ltd (0548) Julia Trevallion (0563) Crieff Hydro Ltd (0589) Aldi Stores Ltd (0591) Scottish Environment Protection Agency (SEPA) (0742)
Provision of the development plan to which the issue relates:	Allocated sites in Crieff	
Planning authority's summary of the representation(s):		
<u>Town Centre and Infrastructure issues</u> John Champion (0042/01/001, 0042/01/002 & 0042/01/004): Concerns highlighted previously by Crieff and Upper Strathearn Partnership, Crieff Community Council and Crieff Community Trust remain valid and unaddressed. Expansion would be welcomed provided improvements are made to the town's infrastructure. However further development in the town should be restrained until the following outstanding issues are addressed in the Plan. <ul style="list-style-type: none">• derelict buildings;• the preference for redevelopment of brownfield sites over greenfield ones;• failed retail proposals on the south side of the town; and• the community's clear preference for supermarket provision in the town centre; and• air quality is unacceptably poor• empty and derelict buildings in the town centre reduce footfall The respondent identifies a need for an independent comprehensive study of traffic flow and road safety issues, particularly along the A85 as it passes through the town centre. Fiona Walton (0400/01/001); (0400/02/002) (0400/02/003): Respondent is concerned that there are no comments regarding secondary school provision and medical facilities for the amount of new houses being built. Respondent is concerned that there are no comments		

regarding increasing levels of light pollution for the amount of new retail development being built, which could be lit 24 hours a day. Respondent is concerned that Crieff High Street is severely polluted without extra houses being built at the eastern edge of the town.

Elizabeth Bell (0408/01/001): The respondent is against greenfield development while brownfield sites and derelict buildings remain in the town centre. To develop in outlying areas before the town centre becomes thriving, vibrant and full would dilute the town centre and add to urban sprawl.

Alan Moore (0495/01/001): The town infrastructure would be placed under severe strain should 800 new houses be developed. In particular, parking (which is already at capacity), as well as key sections of the road network and junctions that are already inadequate. Reference made to Proposals H57, MU7 and MU344. On-street parking is identified as a source of congestion in the town and it should be replaced with off-street parking. Inadequate parking is a disincentive to attracting tourist coaches. A more strategic overview is needed. The development plan should incorporate opportunities to rejuvenate the town centre and action the derelict, unsafe and empty properties. A bypass to the east of the town is suggested to alleviate through traffic pressures and promote development opportunities in the land adjacent.

Strategic district heating opportunity

SEPA (0742/01/028): TAYplan policy 7 and Proposed Plan map 3A, strategy map 3 a low carbon place both refer to strategic district heating opportunities in Crieff however the commitment to delivering the strategic district heating opportunity within the settlement is not included in the settlement statement. Requires wording to be expanded in order that developers are aware of the commitment to developing a strategic district heating opportunity at this location, the approach to be taken with regards proposed development within the strategic district heating opportunity area, and highlight the requirements that may be relevant to proposed development. Refers to SPP paragraphs 29, 154 and 159 (CD004); Scottish Government's Heat Policy Statement Towards Decarbonising Heat; and the local authority duties under the Climate Change (Scotland) Act 2009

Broich Road area

John Champion (0042/01/001) Broich Road is overused and inadequately narrow for the type of vehicles that use it, specifically its junction with King Street. The proposed developments at Broich Road would compound problems identified here, particularly with vehicle queues at school arrival and departure times, and consequent air pollution. Suggests that Broich Road's width and junctions must be improved.

Craig Finlay (0127/01/002): Broich Road is currently dangerous and should further development take place in the area this danger will increase. The length of Broich Road and its junction at King Street should be improved for pedestrians and cyclists as soon as possible, and certainly prior to commencement of development along Broich Road.

Elizabeth Bell (0408/01/002): The respondent is concerned that the roads access to facilities along Broich Road is inadequate and won't cope with the developments proposed there. Developer Contributions have not materialised in the case of the Campus and new Primary School.

Land at Bridgend, Proposal E26

Drummond Estates (0151/01/001): Support for the Plan. Support the continued inclusion of site E26 as being suitable for employment land where Class 4, 5 and 6 use developments would be deemed acceptable.

Woodland Trust Scotland (0462/01/033): The respondent would like to see native woodland specifically included in the site specific developer requirement relating to the new woodland buffer to the south of the site.

SEPA (0742/01/093): A potential flood risk has been identified at this site and part of it may not be suitable for development. A Flood Risk Assessment is therefore required to inform the siting, layout, design and capacity of development on site in a way that avoids an increase in flood risk on and off site and ensures dry pedestrian access and egress at times of flood. Any culverted watercourses in or adjacent to the site are also required to be assessed. The inclusion of a developer requirement with regards a FRA will ensure that developers are fully informed of the flood risk issues affecting the site at the earliest opportunity thereby preventing delay and frustration later in the planning process. It will also ensure that flooding issues are taken into account prior to submitting a planning application and potential developers recognise that the developable area of the site may be constrained by flood risk. Refers to the authority's duty under the Planning Act to ensure that development plans contribute to sustainable development. Refers to the local authority's duty under the Flood Risk Management (Scotland) Act 2009 (CD030) to reduce overall flood risk and promote sustainable flood risk management when exercising their flood risk related functions. Refers to SG online flooding advice paragraph 13 that the avoidance of flood risk, by not locating development in areas at risk of flooding, is a key part of delivering sustainable flood risk management; and paragraph 37 which states that assessment of the effectiveness of sites should take flood risk into account. Refers to SPP paragraphs 29, 256 & 266, which states that this will contribute positively to the creation of sustainable places and support climate change adaptation; the planning system should prevent development which would have a significant probability of being affected by flooding or would increase the probability of flooding elsewhere; and that a FRA may be required where factors indicate a heightened risk may be present.

Land south of Broich Road, Proposal MU7

R Simpson & Son (0425/01/001): The respondent requests amendments to make appropriate reference to the planning permission for this site and to delete the word retail, which is assumed to be an error.

Rory Stewart (0463/01/001): The respondent requests amendments to the fifth bullet point in the site specific developer requirements and plan. Although the plan is indicative, the main developable areas have been much reduced from what is considered to be appropriate. Specific amendments to the fifth bullet point are requested as follows: "Existing woodland framework to be retained, existing hedge lines and woodland corridors within and around the perimeter of the site to be extended where appropriate in accordance with future detailed landscape assessment/proposals." And revisions to the site specific diagram to better reflect existing woodland and potential developable area.

John Champion (0042/01/001) Development should be restrained until the town centre measures described above are addressed.

Woodland Trust Scotland (0462/01/034): The respondent would like to see native woodland specifically included in the site specific developer requirement relating to woodland extension.

SEPA (0742/01/118): A potential flood risk has been identified at this site. As such, part of the site may not be suitable for development and a flood risk assessment will be required to inform the siting, layout, design and capacity of development on site in a way that avoids an increase in flood risk on and off site and ensures dry pedestrian access and egress at times of flood. Any culverted watercourses in or adjacent to the site are also required to be assessed. The inclusion of a developer requirement with regards a FRA will ensure that developers are fully informed of the flood risk issues affecting the site at the earliest opportunity thereby preventing delay and frustration later in the planning process. It will also ensure that flooding issues are taken into account prior to submitting a planning application and potential developers recognise that the developable area of the site may be constrained by flood risk. . Refers to the authority's duty under the Planning Act to ensure that development plans contribute to sustainable development. Refers to the local authority's duty under the Flood Risk Management (Scotland) Act 2009 to reduce overall flood risk and promote sustainable flood risk management when exercising their flood risk related functions. Refers to SG online flooding advice paragraph 13 that the avoidance of flood risk, by not locating development in areas at risk of flooding, is a key part of delivering sustainable flood risk management; and paragraph 37 which states that assessment of the effectiveness of sites should take flood risk into account. Refers to SPP paragraphs 29, 256 & 266, which states that this will contribute positively to the creation of sustainable places and support climate change adaptation; the planning system should prevent development which would have a significant probability of being affected by flooding or would increase the probability of flooding elsewhere; and that a FRA may be required where factors indicate a heightened risk may be present. Refers to the SEA, which identified the flood risk and a mitigation measure of a flood risk assessment at this site, therefore a development requirement should reflect that.

Ben Challum Ltd (0107/01/004): The increase in housing capacity proposed at MU7 will not increase housing output. The housing output would remain constant but likely take place over a longer period than originally anticipated.

Land north of Broich Road, Proposal MU344

John Champion (0042/01/001): Development should be restrained until the town centre measures described above are addressed.

Craig Finlay (0127/01/002): Additional evidence is required to support the Proposed Plan's position that only one of the two retail sites will be built out during this plan period, since both have planning permission. The respondent refers to media statements that assert both developers are keen to progress development as soon as possible but feel the Council is responsible for unnecessary delay.

London and Scottish Developments Ltd (0548/01/001 & 0548/01/002): Fully intend to deliver a retail development on part of site MU344 (on land to west of Duchlage Farm planning application reference 17/01918/FLL) and consider the preferred use for the remainder of the proposed site to be mixed uses including housing, offices, light industry, surgeries and leisure. Reference is made to the uses set out in Policy 7B.

Aldi Stores Ltd (0591/01/005): Planning permission in principle has been granted and an

application for approval of matters specified in conditions has been lodged. Amend site specific developer requirement relating to listed building to more accurately reflect the decision of the local review body (refers to planning applications 17/02070/LBC & 17/02069/FLL)

Ben Challum Ltd (0107/01/005): Neither site will reasonably come forward for retail uses if there is a prospect for residential development value instead. Site's allocation should not be for mixed use development.

Land at Wester Tomaknock, Proposal H57

John Champion (0042/01/003) Concerns over the suitability of access via Dollerie Terrace due to congestion.

Fiona Walton (0400/02/001): Respondent is concerned that there doesn't seem to be mention of light pollution in the area from the numerous new houses and the retail units.

L. Jane Laird (0487/01/001): Respondent seeks removal of the proposal from the Plan. Roads infrastructure is inadequate for the anticipated increase in traffic and congestion will affect access to Crieff town centre via Dollerie Terrace. Emergency vehicles could be restricted by the increased traffic volume. The traffic that will be generated by the proposed development will require to use Dollerie Terrace to access services and destinations in the town, and to access the main roads out of the town. However the town centre is already congested. Transport Scotland should carry out a traffic assessment to evaluate the impact of this proposed development. Respondent raises concerns that the proposal is contrary to Policy 1 "Placemaking" of the Proposed Plan because it will destroy the identity of Tomaknock as a hamlet with its own unique history and characteristics. The developer's design statement proposes buildings and structures that are inappropriate and contrary to the Placemaking policy, particularly the castle-like structure.

Simon Barnes (0493/01/001): Respondent seeks removal of the proposal from the Plan. Dollerie Road is unsuitable to support the proposal and there is no transport assessment and supporting mitigation. Emergency vehicles could be restricted by the increased traffic volume. The junction of Dollerie Terrace and the A85 trunk road is often congested. The respondent raises concerns that the proposed development will be occupied by car dependent households because the bus stops and schools are not within walking distance. Respondent raises concerns that the proposal does not acknowledge "Placemaking". The proposal will destroy the identity of Tomaknock as a small hamlet. The proposed castle-like structure in a courtyard type layout does not consider and respect site topography and is wholly inappropriate in a semi-rural environment. Respondent raised concerns that there would be serious disturbance to the abundance of wildlife known to be present at the site. Respondent questions the existence of choice in the market and states that other proposed housing developments have stalled or not yet started. The Respondent raises concerns in respect of capacity at the High School and Primary School, the health centre, the dental facilities and the sewage facilities in the town.

James & Linda Holden (0529/01/001): Respondent seeks removal of the proposal from the Plan. Traffic on Dollerie Road; loss of local identity; distance from primary school makes active travel unattractive option; there is an alternative site nearer the primary school; comments relating to relative selling prices; comments on design of 2.5 storey flatted block, which is out of keeping with the surrounding area; comments that strip developments are against government policy; and that the development plan was not

changed to include Wester Tomaknock, rendering planning permission invalid.

Julia Trevallion (0563/01/001): Respondent seeks a reduction in the site's capacity because the roads are not suitable for the increased traffic. No three storey houses and more space between houses with larger gardens and extra parking spaces.

SEPA (0742/01/120): Support for the Proposed Plan. Refers to developer requirement for flood risk assessment.

Land at Alichmore (Site H236)

Drummond Estates (0151/01/002): Suggest a 2.74 ha housing allocation on land south of Strowan Road and north of Alichmore Lane. The respondent refers to planning consent 14/00450/FLL (which is a renewal of 07/00035/FLL) for the erection of 17 houses at a site to the east of the suggested site. The respondent states that the allocation of this site could meet the overall housing requirement in Strathearn; it would provide competition and choice of housing sites; it would be a logical allocation; it would help square off the existing settlement boundary at this location; it would complement existing residential development that has already taken place in the area; the site would have fixed defensible and robust boundaries to the north and west; and could bring improvements to the wider access arrangements to other properties along Alichmore Lane. A landscape setting could be provided to limit Crieff's expansion at this point and strengthen the northern fringe of the Drummond Castle Garden and Designed Landscape designation. In terms of the suggested site's relationship to poultry houses located to its north, a cordon sanitaire and increased landscape buffer could be applied to mitigate adverse impact.

Drummond Estates (0151/01/003): Amend Crieff settlement boundary to include this suggested site

Land at Tomaknock Farm (Site H238)

Ben Challum Ltd (0107/01/001 & 0107/01/004): Suggest a 7.7 ha housing allocation on land at Tomaknock Farm, south of Dollerie Terrace for residential development and associated uses. Refers to Main Issues Report submission.

Land at Wester Kincardine Holdings (Site H240) and Land north of Broich Road and south of Skye Crescent (Site H239)

James Tainsh, Ralph Dargie & Irene Alexander (0424/01/001); Mr & Mrs James Tainsh (0433/01/001): Suggest a housing allocation of 14.04 Ha on the south eastern edge of Crieff. The suggested area is made up of two sites. Firstly a 9.35 Ha housing allocation on land at Wester Kincardine Holdings (Site H240); and secondly a 4.69 Ha housing allocation on land north of Broich Road and south of Skye Crescent (Site H239). Access to both sites could be via a suggested road connecting Broich Road northwards to Kincardine road, the route of which is indicated by a black dashed line in the representation. The respondent states that the development of these combined areas would be more logical than Proposal MU7 or Proposal H57, which is a further distance from the secondary school at Crieff Community Campus.

Craig Finlay (0127/01/001): Suggest site on land north of Broich Road and south of Skye Crescent (Site H239) would be suitable for housing and a pub/restaurant. Beneficial as the

town develops towards the south. Pub/resturantar would be a place to socialise and build community relationships. In keeping with other community infrastructure in this part of Crieff such as library, sports facilities, education facilities; and is close to bus route. Could also provide opportunity to enhance local heritage (archaeology and Scheduled Monument); and link to proposed path from Crieff south to Muthill.

Land north of 1 Callum's Hill (Site H385)

Alexandra Fraser (0045/01/001): Amend settlement boundary to include land to the north of 1 Callum's Hill, which could be considered as suitable for the development of a small house accessed from Pollock Terrace.

Land west of Gilmerton (Site MU383)

Crieff Hydro Ltd (0589/01/001): Identify a new 21.5 Ha proposal for tourism and mixed use development west of Gilmerton. Amend settlement boundary to include the proposal. The respondent wishes to submit an in principle planning application for mixed use development including holiday lodges, leisure facilities, care home, assisted living accommodation, farm shop and café and associated landscaping and access routes 13/00148/IPM and seeks to ensure an appropriate LDP context to support such an application.

Modifications sought by those submitting representations:

Town Centre and Infrastructure issues

John Champion (0042/01/001, 0042/01/002 & 0042/01/004): No specific changes are sought to the plan however the respondent wishes development to be restrained, until specified improvements are made to the town's infrastructure.

Fiona Walton (0400/01/001, 0400/02/002 & 0400/02/003): Amend the plan to include comments on the town's secondary school provision and medical facilities. Restrict lighting on new retail proposals. Reduce air pollution at High Street

Elizabeth Bell (0408/01/001): No specific changes are sought however Crieff's brownfield sites should be prioritised for development over its greenfield sites.

Alan Moore (0495/01/001): No specific changes are sought however parking and sections of the road network and junctions are highlighted as being inadequate. Prioritise off-street over on-street parking and attract tourist coaches. Amend Plan to identify opportunities and properties in the town centre for rejuvenation. Suggests a traffic bypass to the east.

Strategic district heating opportunity

SEPA (0742/01/028): Amend Crieff settlement statement to include a statement of the commitment to developing a strategic district heating opportunity.

Broich Road area

John Champion (0042/01/001); Craig Finlay (0127/01/002); Elizabeth Bell (0408/01/002): No specific changes are sought however concerns are raised over the capacity and

dimensions of Broich Road, its safety record, its use by pedestrians and cyclists, and its ability to cope with the Proposals identified in the Plan.

Land at Bridgend, Proposal E26

Drummond Estates (0151/01/001): Support for the Plan as it relates to Proposal E26

Woodland Trust Scotland (0462/01/033) Amend the developer requirement relating to the new woodland buffer to specify native woodland

Scottish Environment Protection Agency (0742/01/093): Amend the developer requirements to specify that a Flood Risk Assessment is required to inform the siting, layout, design and capacity of development in a way that avoids an increase in flood risk on and off site and ensures dry pedestrian access and egress at times of flood.

Land south of Broich Road, Proposal MU7

R Simpson & Son (0425/01/001): Amend the Plan to insert a reference to a recent planning consent in respect of part of this site. Delete the word 'retail' from the description of the existing planning consent, which is assumed to be an error.

Rory Stewart (0463/01/001): Amend the fifth developer requirement and site specific diagram to say: "Existing woodland framework to be retained, existing hedge lines and woodland corridors within and around the perimeter of the site to be extended where appropriate in accordance with future detailed landscape assessment/proposals." and revise the site specific diagram to better reflect existing woodland and potential developable area.

John Champion (0042/01/001): No specific changes are sought to the plan however the respondent wishes development in the Broich Road area to be restrained, until specified improvements are made to the town's infrastructure.

Woodland Trust Scotland (0462/01/034) Amend the developer requirement relating to the new woodland buffer to specify native woodland

Scottish Environment Protection Agency (0742/01/118): Amend the developer requirements to specify that a Flood Risk Assessment is required to inform the siting, layout, design and capacity of development in a way that avoids an increase in flood risk on and off site and ensures dry pedestrian access and egress at times of flood.

Ben Challum Ltd (0107/01/004): Allocate additional housing land on a site such as site H238 Tomaknock Farm.

Land north of Broich Road, Proposal MU344

John Champion (0042/01/001): No specific changes are sought to the plan however the respondent wishes development in the Broich Road area to be restrained, until specified improvements are made to the town's infrastructure.

Craig Finlay (0127/01/002): No specific changes are sought to the plan however the respondent wishes more evidence to support the Proposed Plan's position that only one of the two retail sites will be built out during this plan period.

London and Scottish Developments Ltd (0548/01/001 & 0548/01/002): Amend the Plan to allocate retail use on the western part of the site; and mixed uses including housing, offices, light industry, surgeries and leisure on the remainder of the site.

Aldi Stores Ltd (0591/01/005): Amend the Plan to more accurately reflect the decision of the local review body (refers to planning applications 17/02070/LBC & 17/02069/FLL)

Ben Challum Ltd (0107/01/005): No specific changes are sought to the plan

Land at Wester Tomaknock, Proposal H57

John Champion (0042/01/003): No specific changes are sought to the Plan however the respondent wishes to highlight concerns as to the suitability of Dollerie Terrace due to congestion.

Fiona Walton (0400/02/001): No specific changes are sought to the Plan however the respondent wishes to highlight light pollution from the Proposal

L. Jane Laird (0487/01/001); Simon Barnes (0493/01/001); James & Linda Holden (0529/01/001): Amend the Plan to remove Proposal H57

Julia Trevallion (0563/01/001): Amend Plan to reduce the site's capacity; limit the height of development to two stories; and increase the number of parking spaces.

SEPA (742/01/120): Support for the Proposed Plan in respect of the inclusion of a developer requirement for flood risk assessment for this Proposal.

Land at Alichmore (Site H236)

Drummond Estates (0151/01/002): Amend the Plan to include a 2.74 ha housing allocation at land south of Strowan Road and north of Alichmore Lane.

Drummond Estates (0151/01/003): Amend the Crieff settlement boundary to include a 2.74 ha site at land south of Strowan Road and north of Alichmore Lane.

Land at Tomaknock Farm (Site H238)

Ben Challum Ltd (0107/01/001 & 0107/001/004): Amend Plan to add a 7.7 ha housing allocation at land at Tomaknock Farm, south of Dollerie Terrace.

Land at Wester Kincardine Holdings (Site H240) and Land north of Broich Road and south of Skye Crescent (Site H239)

James Tainsh, Ralph Dargie & Irene Alexander (0424/01/001); Mr & Mrs James Tainsh (0433/01/001): Amend Plan to add a 14.04 ha housing allocation on the south eastern edge of Crieff.

Craig Finlay (0127/01/001): Amend Plan to add a 4.69 ha housing and pub/restaurant allocation on land north of Broich Road and south of Skye Crescent.

Land north of 1 Callum's Hill (Site H385)

Alexandra Fraser (0045/01/001): Amend settlement boundary to include land to the north of 1 Callum's Hill.

Land west of Gilmerton (Site MU383)

Crieff Hydro Ltd (0589/01/001): Amend Plan to add a 21.5 ha tourism and mixed use proposal on land west of Gilmerton. Amend Crieff settlement boundary to include the suggested proposal.

Summary of responses (including reasons) by planning authority:

Town Centre and Infrastructure issues

John Champion (0042/01/001, 0042/01/002 & 0042/01/004); Fiona Walton (0400/01/001, 0400/02/002 & 0400/02/003); Elizabeth Bell (0408/01/001); Alan Moore (0495/01/001): The respondents raise a number of important issues relating to Crieff's ability to accept large developments and the pace of development. The Crieff Infrastructure Study identifies and addresses a number of the points raised, in particular empty and derelict building in the town centre, retail issues, air quality, secondary school provision, medical facilities, parking and roads issues.

In respect of empty and derelict buildings in the town centre, the Council acknowledges the importance of finding new uses to enable their restoration or renovation for two main reasons: firstly to secure the future of each derelict building and bring it back into use, and secondly to improve the overall vitality of the town centre through the removal of voids and unsightly vacant buildings or development sites. The Plan contains policies that prioritise development in town centres, in line with the town centres first principles, and would support proposals for restoration or renovation of these buildings, some of which are listed.

The town centres first principles also prioritise brownfield and town centre development sites over greenfield ones. While the Plan contains large proposals on greenfield sites around the town, it also contains considerable policy support for development on brownfield sites.

The retail proposals cited to by respondents as having failed on the south side of town are understood to refer to a long-standing commitment to develop a supermarket at a site along Broich Road. The current planning status of Proposal MU344 is set out in the Plan and the Council expects that at least one of the retail consents at that location will be implemented. The Plan's position, which allows for alternative uses should none or only part of the site come forward for retail, is drafted to avoid a situation where the remainder of the site remains undeveloped for an extended period, for the reasons set out in the Plan. This approach would also support the development of alternative uses at Proposal MU344 should the provision of retail floorspace focus on sites in the town centre instead of at Broich Road.

Concerns about air quality relate mainly to the Crieff Air Quality Management Area, which has been designated to include parts of the A85 trunk road where it crosses the town centre. An Air Quality Action Plan is under preparation for Crieff to address these concerns. In addition, the Plan proposes supplementary guidance on Air Quality.

In respect of comments on the provision of off-street parking, the Council has recently revised its parking charges to try to reduce demand for on-street parking spaces (by introducing charges); and to increase use of existing off-street parking spaces by removing parking charges.

The suggestion for a bypass to the east of the town was not submitted during the earlier LDP2 plan preparation stages at pre MIR or MIR and so has not had the benefit of stakeholder engagement or public consultation. In addition any bypass would be in effect a diversion of the A 85 Trunk Road and could only be progressed with the co-operation of Transport Scotland. Whilst no detailed works have been examined it is likely that such a project would cost in the region of £100M and it is unlikely that a viable business case could be developed.

In respect of the request to restrict lighting on new retail proposals, it is understood that this relates to light pollution generally in the town, and to a site specific retail proposal. In terms of the general issue of light pollution, the Plan contains a policy on nuisance from artificial light and light pollution that seeks to ensure that any lighting installed in connection with new proposals is regulated and maintained to avoid obtrusive and/or intrusive effects. This applies to new applications for consent (including any future applications for retail developments) but it would not be applicable to existing development unless conditions had been attached to existing consents. In respect of the specific point raised about light pollution from retail development, yet to be built, this issue has been given consideration prior to the determination of the existing retail planning consents, thought to be those consented at Broich Road and discussed elsewhere within this schedule, so has already been taken into account.

No modification is proposed to the Plan.

Strategic district heating opportunity

SEPA (0742/01/028): The Council's response to this issue is given in Issue 14 A Low Carbon Place, in response to representations on Policy 32 Sustainable Heating & Cooling.

Broich Road area

John Champion (0042/01/001); Craig Finlay (0127/01/002); Elizabeth Bell (0408/01/002): Three significant developments along Broich Road have planning consents: two separate retail consents on sites to the north of Broich Road (Proposal MU334) and a mixed use development to the south of the road (Proposal MU7). All three have a S75 obligation to make a proportionate contribution to the improvement of Broich Road and its junctions with King Street and Burrell Street.

The Council recently consulted on proposals to realign the junction of Broich Road with King Street and Burrell Street in Crieff. The consultation sought views on changing the junction priorities and layout, including three new crossing locations. Following the consultation, agreement has been reached and the proposed works have been programmed independently of the Local Development Plan and the delivery of the proposals mentioned in representations.

No modification is proposed to the Plan.

Land at Bridgend, Proposal E26

Drummond Estates (0151/01/001); Woodland Trust Scotland (0462/01/033); Scottish Environment Protection Agency (0742/01/093): The suggested amendments to the Plan relate to the site specific developer requirements for the Proposal. The need for a landscape framework has been assessed and while not essential, it may be desirable to specify native species. In respect of the need for a Flood Risk Assessment, the proposal has been recently assessed by SEPA as requiring the submission of a FRA and for the reasons set out in their representation. Although this only affects a small part of the site it may be desirable to specify this in the site specific developer requirements.

No modification is proposed to the Plan. However there is some merit in the respondents' suggestions (particularly in the suggestion from SEPA). Should the reporter be considering either or both of these suggested modifications, the Council would be comfortable in accepting a recommendation to change the plan in this respect.

Land south of Broich Road, Proposal MU7

R Simpson & Son (0425/01/001); Rory Stewart (0463/01/001); John Champion (0042/01/001); Ben Challum Ltd (0107/01/004): There is no need for the Plan to specifically cite the planning application reference for the consent for this part of Proposal MU7. The Council can confirm that the use of the word 'Retail' is a simple error that may be corrected prior to the Plan's adoption and may be amended as a non-notifiable modification. Turning to the suggestion to amend the fifth bullet point, the Council sees little need for the site specific developer requirements to refer to a landscape assessment/proposals not yet carried out nor approved by the Council, nor for the explicit use of the word 'appropriate'. In terms of restraining development, the Council has granted planning permission in principle for the majority of the site and expects development to commence within the Plan period.

No modification is proposed to the Plan.

Woodland Trust Scotland (0462/01/034); SEPA (0742/01/118): The suggested amendments to the Plan relate to the site specific developer requirements for the Proposal. The need for a landscape framework has been assessed and while not essential, it may be desirable to specify native species. In respect of the need for a Flood Risk Assessment, the proposal has been recently assessed by SEPA as requiring the submission of a FRA and although this only affects a small part of the site it may be desirable to specify this in the site specific developer requirements.

No modification is proposed to the Plan. However there is some merit in SEPA and Woodland Trust suggestions (particularly in the suggestion from SEPA). Should the reporter be considering either or both of these suggested modifications, the Council would be comfortable in accepting a recommendation to change the plan in this respect.

Land north of Broich Road, Proposal MU344

John Champion (0042/01/001); Craig Finlay (0127/01/002); Ben Challum Ltd (0107/01/005): In terms of restraining development, the Council has granted planning permission in principle for both parts of the site and expects development to commence within the Plan period. The Plan's statement about alternative uses should only one of the two retail consents be progressed reflects a fall-back position for the Plan should such a

decision be taken by one or both developers. The site has a lengthy planning history of developer interest for retail and the Council is of the view that only one of the retail planning consents may be progressed as the capacity for Crieff to accommodate both is not proven. In the event that either or both are not, the Plan seeks to ensure that provision is made for alternatives.

London and Scottish Developments Ltd (0548/01/001 & 0548/01/002); Aldi Stores Ltd (0591/01/005): The Council does not agree with the suggestion by London and Scottish Developments to reduce flexibility for alternative non-retail uses on its part of the site, and to exclude retail from the remainder of the site because the Plan's clearly stated aim is to deliver retail development at this site. Should this not be possible during the plan period, the non-retail alternatives listed in the Plan are intended to be available to both parts of the site. Turning to the site specific developer requirements relating to listed buildings, they are consistent with the Plan's policy on listed buildings. They are more onerous than those specified in the consents referred to by Aldi Stores Ltd however the Council wishes to clarify that they will be applied to the assessment of any future applications at the site.

No modification is proposed to the Plan in respect of Proposal MU344.

Land at Wester Tomaknock, Proposal H57

John Champion (0042/01/003); Fiona Walton (0400/02/001); L. Jane Laird (0487/01/001); Simon Barnes (0493/01/001); James & Linda Holden (0529/01/001); Julia Trevallion (0563/01/001):

The Plan sets out that planning permission has been granted for part of the proposal site. In fact, the Planning Authority is minded to grant planning permission for the majority of the proposal site (16/02217/FLM), although a decision notice had not been issued at the time of writing because it is subject to the conclusion of a S75 planning agreement (which is awaiting registration). The remainder of the proposal site is a relatively small area along its eastern edge, and although no planning application has been submitted to date, it is expected that this smaller site will be integrated with the larger site during the plan period.

The respondents' comments broadly fall into two groups: firstly, those seeking changes to Proposal H57 in order to modify the design, appearance and scale of the already-consented development; and secondly those seeking to have the proposal removed from the plan, perhaps hoping that this would revoke the permission before it has started.

In terms of the first group of representations seeking changes to Proposal H57, comments about the height, layout, plot size and design of the houses, the number of storeys, the general arrangement of development and the parking provision in the development are issues that are within the scope of the masterplan, which is already approved under the terms of the above planning consent.

Should the current planning permission lapse and an alternative scheme be submitted for consideration, these issues would form part of its assessment. However to effect changes to an already-consented permission (or to revoke it) would require procedures that are outwith the scope of the Local Development Plan examination.

Issues relating to the capacity of the local road network to accommodate the proposal are addressed in the Transport Assessment that is also already approved under the terms of the above planning consent. The Transport Assessment addresses issues such as access

for emergency vehicles, distances to bus stops, parking arrangements, and active travel routes to school.

In terms of the concerns raised in respect of light pollution from the proposal, the Plan contains a policy on nuisance from artificial light and light pollution that seeks to ensure that any lighting installed in connection with new proposals is regulated and maintained to avoid obtrusive and/or intrusive effects.

One respondent seeking removal of the Proposal expresses concerns about the coalescence of Crieff and the hamlet of Tomaknock however the two are already enclosed within the same settlement boundary. Although true that Tomaknock would effectively join up with Crieff, and as a consequence its character and setting would be likely to change, the Plan recognises that this edge of settlement location is appropriate for a housing proposal such as H57.

Other concerns raised as reasons for removal of the Proposal from the Plan, such as impact on wildlife, lack of progress at other housing developments in the town, capacity at the Strathearn Community Campus and primary school, capacity at the medical centre and dentist, and at the sewage facilities in the town have all been taken into account of during the preparation of LDP1 and the associate SEA. There were also given greater scrutiny during the determination of the planning application for the site.

No modification is proposed to the Plan in respect of Proposal H57.

Land at Alichmore (Site H236)

Drummond Estates (0151/01/002); Drummond Estates (0151/01/003): The Plan already contains an adequate supply of effective short and long term housing land that meets the Strathearn housing land requirement. The suggested site is steep in places, is near an intensive chicken rearing unit which may not be fully compatible with residential development. Although the respondent suggests a landscape setting could be provided the Council considers the suggested housing development would be visually prominent and is opposed to allocate housing land at this location. In terms of the respondent's alternative suggestion for a simple boundary adjustment to include the site, the Council sees no merit in this because the land is not deemed suitable for housing development for the reasons already set out. The potential for this site has not been consulted upon nor is there any evidence about its viability and its inclusion in the Plan, in the absence of a housing land shortfall would not be appropriate.

No modification is proposed to the Plan.

Land at Tomaknock Farm (Site H238); Land at Wester Kincardine Holdings (Site H240) and Land north of Broich Road and south of Skye Crescent (Site H239)

Ben Challum Ltd (0107/01/001 & 0107/01/004); James Tainsh, Ralph Dargie & Irene Alexander (0424/01/001); Mr & Mrs James Tainsh (0433/01/001); Craig Finlay (0127/01/001): The respondents suggest a range of sites on Crieff's eastern periphery, all of which are outside the settlement boundary. The Adopted LDP assessed options for Crieff's expansion and concluded that major expansion should be to the south, with only limited growth in an easterly direction. The main reason for this was the landscape sensitivity in that area. There are access issues expanding west, and topography and landscape limits any northern expansion. In addition the Plan already contains an

adequate supply of effective short and long term housing land that meets the Strathearn housing land requirement. The suggested sites would represent a major expansion on top of that already in the Adopted Plan and would require joint working to deliver the infrastructure (for example the access road mentioned in representations). There is insufficient evidence of the individual landowners working together. The potential for this site has not been consulted upon nor is there any evidence about its viability and its inclusion in the Plan, in the absence of a housing land shortfall would not be appropriate.

No modification is proposed to the Plan in respect of Sites H238, H239 and H240.

Land north of 1 Callum's Hill (Site H385)

Alexandra Fraser (0045/01/001): This site was originally allocated as open space inside the settlement boundary in the historic Strathearn Area Local Plan (CD164). Its function was to provide a setting for the main road in and out of Crieff, and to provide a buffer for the housing development at Callum's Hill and the road. The Adopted LDP redefined Crieff's settlement boundary in the Callum's Hill area and excluded the respondent's suggested site, intending it to be left undeveloped. It continues to provide a landscape and visual gateway function and the Council does not consider it to be a suitable location for a house plot.

No modification is proposed to the Plan.

Land west of Gilmerton (Site MU383)

Crieff Hydro Ltd (0589/01/001): This is a suggestion for a large development comprising a mix of uses. A planning application in principle was refused (13/00148/IPM) and a review of that decision was upheld at Local Review Body (LRB) – primarily due to a lack of environmental information submitted. Whilst the respondent suggests a resubmission is under preparation, to make a site allocation based on the refused planning application and in the absence of the required environmental assessment would not be appropriate.

It was for the applicants to address the deficit in such information prior to submitting their representation. The suggested mix of uses contains care home, assisted living, and leisure, tourist and retail facilities and some or all of these uses would be better located at highly accessible locations such as in or adjacent to the town centre.

Concerns highlighted in the determination of the planning application (and subsequent LRB review) included from Perth and Kinross Community Health Partnership, NHS Tayside and the Council's Health and Community Care function that the scale and nature of the care home and assisted living accommodation elements are unsupportable and contrary to Scottish Government and Perth and Kinross policies on reshaping care for older people. There was also a lack of information on how the development could impact on air quality, retail impact on Crieff town centre; and access.

Concerns were also raised in respect of access, ecology and natural habitats, and impact on cultural heritage although these issues did not form specific reasons for the refusal of the planning application (which was due to the lack of environmental information, having regard to the Development Plan and other material considerations).

A major amendment such as suggested by the respondent to Crieff's settlement boundary and the issue of coalescence with adjacent Gilmerton are significant Local Development

Plan issues that ought to be more fully consulted on. However this proposal was not submitted during the earlier LDP2 plan preparation stages at pre MIR or MIR and so has not had the benefit of stakeholder engagement or public consultation at those stages.

No modification is proposed to the Plan.

Reporter's conclusions:

Reporter's recommendations: