

Issue 43	Strathearn Area – Settlements with Proposals	
Development plan reference:	Comrie, pages 157-158 H58 – Cowden Road, page 158	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<div> <p> Derek and Agnes Redfern (0048) John Cook (0050) Mrs Josephine Moore (0051) John Dimopoulos (0080) Crawford Wilson (0081/01, 0081/02, 0081/03, 0081/04, 0081/05 & 0081/06) Ian Loxley (0100) Nickola Loxley (0101) Christopher and Janette Begg (0106) Paul Mouncey and Margaret Douglas (0109) Carol Mulligan (0121) Janice Fraser (0158) Brian Christie (0159) Ian Stewart (0160) Mrs Kathleen Wilson (0167) Mrs Florina W MacDougall (0168) David Wilson (0169) Mr G E MacPhee (0183) Ian McIntyre (0184) Edith McIntyre (0186) Mrs Jane E A Ross (0187) Robert Bruce Findlay (0190) Patricia Sinclair (0193) Naomi Nyamudoka (0194) Henry Glasgow (0196) Jacqueline Morgan (0197) Anne Pirie (0198) Mrs Marjorie Gibb (0199) Mairi Sinclair (0200) M. Tell (0201) Mr A D Ross (0203) Francis Haig Hamilton (0209) Fiona Cumming (0219) Lauren Mcallister (0220) Callum Cumming (0221) Mrs Emma Barrie (0223) Martin Hogg (0227) Cindy and Steven Glass (0228) </p> </div> <div> <p> Dr David RD Bushby (0230) Daniel Reeve Simmons (0231) Brenda Elizabeth Simmons (0232) Eileen Hogg (0237) Susan Haggart (0246) RK Ginsberg (0250) B. Spratt (0251) Margaret Spratt (0253) Mr Matthew Jack (0254) Anne Lawson (0256) Alan Laing (0260) Alex Urquhart (0267) Perth and Kinross Heritage Trust (0272) Mrs Vanessa Davidson (0276) Ken Heiser (0278) Mr A Tod (0285) Mrs Dorothy Briggs (0287) Elizabeth CF Cromar (0299) Christine Ross (0300) Robert Sommers Wood (0301) Elizabeth Steinka (0302) Mr C Tod (0303) Ann Turner (0307) Jan Parker (0312) Norman Hetherington (0316) Jessie Downs (0317) John and Madeleine King (0318) Mary Knox (0326) Andrew Lorimer (0327) Maxwell Penfold (0328) Malcolm Allan (0329) Fiona Penfold (0330) Carol A Calder (0331) John Dewar (0332) Margaret Rose (0334) Dr Gillian Allan (0342) Hugh Rose (0343) Ann Dewar (0344) Ian Wright (0348) </p> </div>		

<p>Georgina Brannan (0351) Mr Angus Barrie (0352)James Lambie (0354) John & Helen Whitelaw (0357) Mr & Mrs H Anderson (0362) PM Ann Reith (0365) Scott Haggart (0368) Marion Burns (0370) Christian Campbell (0388) Graeme A Hendry (0397) Mr Murray Lauchlan (0401) William A Lang (0403) Mrs Mary McGillivray (0407) Mr Robert Turner (0415) Liam Hegarty (0416) Cressida Jauncey (0419) Lynn Manderson & James Wilson (0421) S Peedle (0434) Mr William Douglas (0438) Mr James Tainsh (0440) Jamie Jauncey (0443) Donald McGillivray (0447) Simon Jauncey (0452) Dr Richard Murray (0457) Mr John Young (0460) Woodland Trust Scotland (0462) Neill Aitken (0464) Mrs Morag Aitken (0465) Heather Reid (0467) Mrs Anne Glasgow (0482) Michael and Christine Taylor (0483) Debbie Dimopoulos (0488) J A Reid (0492) Gillian Lauchlan (0496) Moira Mathew (0508) William Gordon Grant (0512) Mr & Mrs G R Grant (0514)</p>	<p>Mary Wilson (0523) Comrie Community Council (0534) RM Ferguson (0543) Jim Guild (0545) David Scott-Angell (0550) Marie Macdonald (0557) Dr E. Morag Crabbie (0561) Marc Di Rollo (0573) Andrew Thompson (0574) Mrs Pauline Toole (0576) Mr John Davidson (0578) Dr Joe Toole (0579) Miss J H McDowall (0582) Agnes Drysdale (0585) Leslie W Paterson (0586) R. Campbell (0600) A & J Stephen Limited (0622) John MacInnes Drysdale (0627) Felicity Martin (0638) Margaret O McVicar (0644) Kathleen McIntyre (0645) Evelyn Temple (0646) Mr Peter McArthur (0647) Mrs Helen McArthur (0648) James S Arnott (0649) Maureen A Arnott (0650) Robin D Arnott (0651) Catriona Cleghorn (0652) Martin Gray (0658) Veronica S. McChesney (0676) Janet Heiser (0680) Mairi Philp (0681) J A Burdon-Cooper (0699) Tessa Ingleby (0706) Mrs C Hendry (0709) Scottish Environment Protection Agency (SEPA) (0742)</p>
Provision of the development plan to which the issue relates:	Allocated sites in Strathearn non-tiered settlements: Comrie
Planning authority's summary of the representation(s):	
<p><u>Introduction</u></p> <p>There are two issues raised in respect of Comrie:</p> <ul style="list-style-type: none"> All but two of the representations here make comments in respect of Proposal H58 that allocates a housing site at Cowden Road. Nearly all of the representations received seek the removal of the proposal and state reasons; some representations 	

suggest the housing allocation is not needed while others suggest alternative sites elsewhere in the settlement that could be allocated for housing instead of H58. There is some conditional support for the proposal.

- The two representations that do not mention H58 instead comment on the suggestion to allocate a new housing site at Strowan Road. The suggestion was first made at the pre-MIR call for sites stage. One representation seeks a housing allocation at the site; and one representation supports the Proposed Plan.

Land at Cowden Road (Proposal H58)

H58 conditional support for and amendments to the proposal

A & J Stephen Limited (0622/01/005): Offering broad support for the proposal while seeking an increase to the site's capacity, a change to the site specific developer requirements and offering points of clarification to support the proposal.

- Requests amendment to 65 units comprising 49 mainstream private units and 16 affordable units because this mix mostly consisting of smaller single storey houses would be more appropriate for the current local market and would facilitate an appropriate local range and choice. The respondent states that the site capacity range in the proposed plan is very low (8.7–13.7 per ha), which would lead to larger houses being provided that would not align with local needs; and that the suggested amendment would equate to a more appropriate 17 per ha.
- Representation confirms joint working with landowner to bring this proposal forward to deliver local and effective housing land supply.
- Representation asserts that the required access is owned by A & J Stephen Limited and that technical capacity is readily available.

SEPA (0742/01/056): Support for the Flood Risk Assessment developer requirement.

- It accords with the Planning Authority's duties to ensure that development plans contribute to sustainable development.
- The Flood Risk Management (Scotland) Act 2009 (CD030) also places a duty on local authorities to reduce overall flood risk and promote sustainable flood risk management when exercising their flood risk related functions. Paragraph 13 of the Scottish Government's online planning advice on flood risk recognises 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.
- The requirement accords with paragraph 255 of SPP (CD004), which advocates a precautionary approach to flood risk. It states that the planning system should promote flood avoidance by safeguarding flood storage and conveyance capacity and locate development away from functional flood plains and medium to high risk areas. Paragraph 256 of SPP states that 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. The requirement also complies with paragraph 266 of SPP which states that a FRA may be required where factors indicate a heightened risk may be present.
- Paragraph 37 of the Scottish Government's online planning advice on flood risk states that development plans should ensure that any assessment of the effectiveness of sites, especially housing sites, takes flood risk into account.

- As set out in paragraph 29 of SPP, this approach will also contribute positively to the creation of sustainable places and support climate change adaptation and therefore accords with the local authority's duties under section 44 of Climate Change (Scotland) Act 2009 (CD025)
- As identified in the SEA, this area/part of this area is at flood risk. The SEA should be used to inform the LDP and we support the SEA being used to identify a developer requirement of a flood risk assessment at this site.

H58 remove proposal from the Plan

Derek and Agnes Redfern (0048/01/001; 0048/02/001); John Cook (0050/01/001); Mrs Josephine Moore (0051/01/001); John Dimopoulos (0080/01/001); Crawford Wilson (0081/01/003) (0081/02/003) (0081/03/001) (0081/04/001) (0081/05/001) Ian Loxley (0100/01/001); Nickola Loxley (0101/01/001); Christopher and Janette Begg (0106/01/001); Paul Mouncey and Margaret Douglas (0109/01/001); Carol Mulligan (0121/01/001); Janice Fraser (0158/01/001); Brian Christie (0159/01/001); Ian Stewart (0160/01/001); Kathleen Wilson (0167/01/001); Mrs Florina W MacDougall (0168/01/001); David Wilson (0169/01/001); Mr G E MacPhee (0183/01/001); Ian McIntyre (0184/01/001); Edith McIntyre (0186/01/001); Jane E A Ross (0187/01/001); Patricia Sinclair (0193/01/001); Naomi Nyamudoka (0194/01/001); Henry Glasgow (0196/01/001); Jacqueline Morgan (0197/01/001); Anne Pirie (0198/01/001); Marjorie Gibb (0199/01/001); Mairi Sinclair (0200/01/001); M. Tell (0201/01/001); Mr A D Ross (0203/01/001); Emma Barrie (0223/01/001); Martin Hogg (0227/02/001); Cindy and Steven Glass (0228/01/001) (0228/02/001); David RD Bushby (0230/01/001); Daniel Reeve Simmons (0231/01/001); Brenda Elizabeth Simmons (0232/01/001); Eileen Hogg (0237/01/001); Susan Haggart (0246/01/001); RK Ginsberg (0250/01/001); B. Spratt (0251/01/001); Margaret Spratt (0253/01/001); Matthew Jack (0254/01/001); Anne Lawson (0256/01/001); Alan Laing (0260/01/001); Vanessa Davidson (0276/01/001); Ken Heiser (0278/01/001); Mr A Tod (0285/01/001); Dorothy Briggs (0287/01/001); Elizabeth CF Cromar (0299/01/001); Christine Ross (0300/01/001); Robert Sommers Wood (0301/01/001); Elizabeth Steinka (0302/01/001); Mr C Tod (0303/01/001); Ann Turner (0307/01/001); Jan Parker (0312/01/001); Norman G Hetherington (0316/01/001); Jessie Downs (0317/01/001); Andrew Lorimer (0327/01/001); Maxwell Penfold (0328/01/001); Fiona Penfold (0330/01/001); Carol A Calder (0331/01/001); John Dewar (0332/01/001); Margaret Rose (0334/01/001); Gillian Allan (0342/01/001) (00342/02/001); Hugh Rose (0343/01/001); Ann Dewar (0344/01/001); Ian Wright (0348/01/001); Georgina Brannan (0351/01/001); Angus Barrie (0352/01/002); James Lambie (0354/01/001); John & Helen Whitelaw (0357/01/001); Mr & Mrs H Anderson (0362/01/001); PM Ann Reith (0365/01/001); Scott Haggart (0368/01/001); Marion Burns (0370/01/001); Christian Campbell (0388/01/001); Graeme A Hendry (0397/01/001); Murray Lauchlan (0401/01/001); William A Lang (0403/01/001); Mary McGillivray (0407/01/001); Robert Turner (0415/01/001); Liam Hegarty (0416/01/001); Cressida Jauncey (0419/01/001); Lynn Manderson & James Wilson (0421/01/001); S Peedle (0434/01/001); William Douglas (0438/01/001); Jamie Jauncey (0443/01/001); Donald McGillivray (0447/01/001); Simon Jauncey (0452/01/001); Richard Murray (0457/01/001); John Young (0460/01/001); Neill Aitken (0464/01/001); Morag Aitken (0465/01/001); Heather Reid (0467/01/001); Anne Glasgow (0482/01/001); Michael and Christine Taylor (0483/01/001); Debbie Dimopoulos (0488/01/001); J A Reid (0492/01/001); Gillian Lauchlan (0496/01/001); Moira Mathew (0508/01/001); William Gordon Grant (0512/01/001); Mr & Mrs G R Grant (0514/01/001); Mary Wilson (0523/01/001); Comrie Community Council (0534/01/001 & 002); RM Ferguson (0543/01/001); Jim Guild (0545/01/001); David Scott-Angell

(0550/01/002); Marie Macdonald (0557/01/001); E. Morag Crabbie (0561/01/001); Marc Di Rollo (0573/01/001); Andrew Thompson (0574/01/002 & 0574/01/003); Pauline Toole (0576/01/001); John Davidson (0578/01/001 & 0578/02/001); Joe Toole (0579/01/001); Miss J H McDowall (0582/01/001); Agnes Drysdale (0585/01/001); Leslie W Paterson (0586/01/001 & 0586/01/003); R. Campbell (0600/01/001); John MacInnes Drysdale (0627/01/001); Felicity Martin (0638/01/001-12); Margaret O McVicar (0644/01/001); Kathleen McIntyre (0645/01/001); Evelyn Temple (0646/01/001); Peter McArthur (0647/01/001); Helen McArthur (0648/01/001); James S Arnott (0649/01/001); Maureen A Arnott (0650/01/001); Robin D Arnott (0651/01/001); Catriona Cleghorn (0652/01/001); Martin Gray (0658/01/001); Veronica S McChesney (0676/01/001); Janet Heiser (0680/01/001); Mairi Philp (0681/01/001); Tessa Ingleby (0706/01/001); C Hendry (0709/01/003)

- respondents wish H58 to be removed from the Plan because its inclusion is not justified by evidence and its development will have several adverse impacts (expanded below)
- several respondents raise the issue that Comrie is not a TAYplan tiered settlement.
- Concerns raised that there is no evidence to suggest a housing shortage in Comrie (0652/01/001)
- several respondents raise concerns that the site is not an effective housing site. With no progress evident since LDP1 adoption, and concerns raised over the uncertainty and lack of clarity on the issues identified by the reporter as being of concern and requiring clarification during the LDP1 examination it must be questioned whether H58 should continue to be designated as effective land (0574/01/002 & 0638/01/004) Concerns are raised that access issues in particular are insurmountable (0576/01/001 & 0579/01/001).
- It is irresponsible planning on the part of PKC to leave this [key issues identified by the LDP1 examination reporter] to be resolved at the [planning] application stage (0576/01/001, 0579/01/001).
- The LDP examination reporter must be confident at the LDP examination stage that the site fits the criteria and all access issues are fully resolved before planning [application] stage. If this cannot be satisfactorily addressed the site should be withdrawn from LDP2 (0648/01/001)
- a petition with nine names, addresses and signatures was submitted by Crawford Wilson (0081/06/001). The petitioners state opposition to residential development at the site due to increased traffic, noise, pollution and damage to the conservation village and nature conservation
- the site should remain in agricultural use
- H58 should be removed from the plan for the duration of LDP2. Its status within the settlement boundary could then be reviewed again at the next plan review depending on progress with the windfall development at Tomperran (0574/01/002)

H58 amend proposal or conditional support

- Andrew Thompson (0574/01/002); Malcolm Allan (0329/01/001); Lynn Manderson & James Wilson (0421/01/001); Michael and Christine Taylor (0483/01/001): If not removed from the Plan, the number of units at H58 should be kept to 30 units, consistent with LDP1
- John and Madeleine King (0318/01/001): No more than 24-30 dwellings. Will require green park spaces for young families. Buffer area between south of houses on south side of Polinard and proposed new homes; and similarly on south side of

the field where the stream/burn and woodland path exist.

- Gillian Allan (0342/01/001): If there is to be development then a much reduced number of housing units and complete clarity on the access
- Matthew Jack (0254/01/001): H58 should be deleted from the Development Plan or its development very severely curtailed
- Anne Lawson (0256/01/001): A small number of new homes would be sustainable but certainly not the possible top numbers contained in the plans
- Robert Bruce Findlay (0190/01/001): If anything should be built on this land it should be a care facility for older people in the area
- Francis Haig Hamilton (0209/01/001): If the development does go ahead it should be conditional on Cowden Road being brought up to adoptable standard (to include modifications to its junction with South Crieff Road) and then subsequently adopted
- Fiona Cumming (0219/01/001); Lauren Mcallister (0220/01/001); Callum Cumming (0221/01/001): Support for the proposal provided the houses are affordable to younger people in the village or in the community
- Alex Urquhart (0267/01/001): Support some new homes being built provided the houses are genuinely affordable and within the reach of young people and families on average incomes. A good community needs a mix of people and local business and commerce cannot survive if Comrie moves towards a model village or a commuter town. It is important that employees of local businesses can live as well as work in the village.
- Mary Knox (0326/01/001): Does not seem a good idea – unless it is affordable houses that would allow the young people of the village to get on the property ladder then that is much needed.
- Perth and Kinross Heritage Trust (0272/01/005): The site has archaeological potential and it is therefore recommended that the Site Specific Developer Requirements are updated to reflect the likelihood of an archaeological investigation and / or protection of Scheduled Monuments being required. Perth and Kinross Heritage Trust provides planning archaeological advice to Perth and Kinross Council. The Trust offers to provide further information about the archaeological potential of the development parcels identified.
- Woodland Trust Scotland (0462/01/005): Welcomes the protection and enhancement of woodland to the east and south boundary. There is an area of 13 ha of LEPO ancient woodland along the eastern boundary
- Miss J H McDowall (0582/01/001): Reduce the number of housing units
- Tessa Ingleby (0706/01/001): A wildlife conservation area would be considerably more in keeping with this location on the edge of Comrie

H58 Environmental

- Greenfield site on prime agricultural land: contrary to policy. The site is under continuous arable cultivation and offers great potential for improvement. Lying in a sheltered position, this field could contribute to local food security and diversity for a community relatively remote from conventional supply chains.
- Fails to meet policy criteria set out in Policy 1a (0574/01/002, 0638/01/001)
- Would result in increased use of nearby footpaths, contrary to policy CF2
- Inconsistent with the items (c) and (f) of policy NE4 Green Infrastructure
- Noise and light pollution, both during and after development
- The proposed development will lead to increased air pollution, particularly that increased CO2 levels will disproportionately affect senior citizens in the area

- The [Comrie] area must remain a low carbon area (0648/01/001)
- Adverse impact on the landscapes, wildlife, country walks and healthy lifestyles enjoyed by existing residents
- Concerns are raised that the private woodland to the east of the proposal are ancient and will need protection under policy NE2A (0407/01/001)
- Concerns are raised that the ten acres of Ancient oak woodland to the east of the proposal would be adversely impacted by proposal H58. The woodland is an important natural amenity that has been privately maintained with help from Scottish Nature Woodland Trust by felling and replanting with native species, maintaining footpaths, building bridges and encouraging wildlife. An important Druidal Stone Circle also lies within the [woodland] site (0578/01/001 & 0578/02/001)
- Concerns that the hedges along Cowden Road are important and should not be pulled down (0488/01/001)
- Adverse impact on protected wildlife, specifically the red squirrel and bat population at the site and birds of prey in the area. Other species mentioned but not specifically protected include deer, foxes, hares, hedgehogs and rabbits. [SEA site assessment LDP1 sites update] (0081/04/001) (0167/01/001) (0196/01/001) (0228/01/001) (0574/01/002) (0649/01/001)
- There are protected species notably bats and red squirrels living in the natural woodland immediately abutting the site to the east, and in the mature conifer woodland strip separated by an ancient right of way and permanent stream along the southern site boundary (0574/01/002)
- The power cables that cross the fields could cause health problems for some people (0183/01/001, 0278/01/001)
- If two storey houses are proposed, they would overlook the single storey bungalows at Polinard [which is along the northern boundary of H58]
- Concerns are raised that any buildings higher than bungalow in this area would look completely out of place and character. Previous planning applications for 1.5 storey houses have been refused (0401/01/001) (0496/01/001)
- Concerns are raised that any houses built on the southern or eastern quadrants of the [proposal] site would suffer extreme deprivation of sunshine, especially in winter months [photographs supplied to illustrate this point (0638/01/008)]. Any remedy for this disadvantage would require removal of valuable native and mature woodland impacting on biodiversity, landscape quality and amenity. The woodland concerned is in different ownership from site H58 making resolution of the problem fraught with potential delay for the developer, or conflict between residents of new houses and neighbouring landowners and environmental agencies if not resolved at planning application stage (0574/01/002 & 0638/01/008)
- Concerns are raised that there may be issues with sewerage capacity in the immediate vicinity. The properties on Cowden Road have a different sewage system installed on their properties. This system needs extra machinery before the sewage could join the village's main system (0276/01/001)

H58 Flood risk

- Flood risk from adjacent burn affects the site (0201/01/001) (0415/01/001).
- Flood risk assessment would be required as the stream on the south edge of the proposal may have an adverse effect on properties in Langside Drive, Cowden Road, Cowden Way and Polinard
- With climate change, higher rainfall intensity means that H58 is at greater risk of

surface water flooding, due to its flat geography and stream proximity (0574/01/002, 0638/01/005 & 0709/01/003)

- The proposed development will not help flood risk in Comrie.
- No new houses should be built or planned in Comrie before the new flood defences have been completed and assessed. Two major floods in Comrie have caused major damage to homes and this is a low-level area of the village (0223/01/001)
- The field with the stream at the edge helps with the drainage required to keep nearby properties safe. The changing climate has brought two serious floods in Comrie in recent years, damaging many dozens of properties. Building 33-55 houses on this site will greatly affect the drainage of the area bringing further risk of flooding (0573/01/001)
- The site is currently a field in agricultural arable use and it absorbs a large amount of rainwater yet the burn at Tinkers Loan still overflows most winters. Flooding is a major strategic issue for Comrie and climate change protection is a core part of the TAYplan sustainability strategy. It is not appropriate to leave this issue to be resolved at the [planning] application stage (0576/01/001 & 0579/01/001)
- There is a serious risk of flooding to site H58 and major flood improvements would be required and any increased water flow would impact on our land further downstream [the downstream land referred to is the adjoining site to the east, which is Highland Heather Lodges and Plant Centre comprising a self-catering holiday business with lodges and five acres of arable ground; and ten acres of ancient woodland] (0578/01/001 & 0578/02/001)
- There was flooding recently at the site of the sewage works (0582/01/001)

H58 access to the site, including Cowden Road and Langside Drive

- The proposal should not be counted as effective housing land because there are fundamental concerns raised in respect of site access
- The proposal cannot be accessed from a public road, making it ineffective for housing land supply. The proposal is bordered by privately owned land and access is by private roads
- The site specific developer requirements require the development to be accessed from the public road. At present Cowden Road and Cowden Lane are not adopted public roads. It is understood that this has been one of the key constraints to development of this site, and yet no information has been provided to show how this obstacle should be overcome.
- Cowden Road is private and is unsuitable for access because it is already well used by walkers and residents and is narrow with no pavements. Its width cannot accommodate two passing cars
- Langside Drive has been blocked at its junction with Cowden Road since the early '70s to avoid through traffic that would infringe upon the residents of Langside Drive
- Langside Drive is unsuitable for access because it is of inadequate width for the proposed increase in traffic, and its exit onto the B827 Braco Road is on a hazardous blind bend
- Concerns raised about the existing level of visitor parking on Langside Drive, which requires careful slow driving. This means the road would be effectively inaccessible for heavier construction traffic, service traffic and refuse collection
- Concerns raised that even if traffic were to be limited to Langside Drive, the fact remains that Cowden Road would be the shorter route and more likely to be used (0228/01/001)
- The earlier Langside Drive development reserved an extension over Cowden Road

as the access to plot H58 (0329/01/001)

- It is understood that the original builder of Langside Drive was allowed to have two endcap culs-de-sac, one of which remains at the end of Langside Drive; while the other was removed when Cowden Way was built. (0401/01/001) (0496/01/001)
- Concerns are raised that when the houses at Cowden Way were built an assessment was made that Langside Drive where it debouched onto the B827 [Braco Road] was at capacity and should not be put under any more pressure (0582/01/001)
- Concerns are expressed that while Stevens Builders have asserted ownership of Cowden Road it is believed that the extent of their ownership is a strip connecting Langside Drive to the proposed site. And in any case ownership of Cowden Road appears to be unclear (0342/01/001)
- Suggest a new road from South Crieff Road at the cemetery boundary wall leading to the north east corner of H58, which would have good sightlines on to the road and no housing to be considered (0329/01/001)

H58 wider roads, traffic and parking issues

- In a rural area that is not easily accessibly other than by car: inconsistent with TA1B
- Poor bus service so would lead to greater car dependency
- Requirement to travel outside the community for employment
- Too far from local shops; in Auchterarder people drive to the shops because the houses are on the outskirts of town (0419/01/001)
- Concerns raised that there will be increased traffic on roads that are already difficult to navigate, especially junctions at Langside Drive and Cowden Road; and South Crieff Road.
- The junction at Top Square at the entrance to Cowden Road is especially highlighted as terrible and confusing by a number of respondents. It is the junction of Dalginross, South Crieff Road, Braco Road and Cowden Road and it would need to be reconfigured.
- The hard engineering work that would be required to bring this access [via Upper Square and Cowden Road] up to adoptable standard would compromise this characterful and ancient public right of way resulting in adverse impact on the character of the conservation area, specific mention is made of the loss of existing un-kerbed wide grass verges along Cowden Road that are within the conservation area (0574/01/002)
- Details of the road plan to accompany this proposal must be presented and agreed with public consultation prior to housing approval (0227/02/001)
- Concerns raised that the proposed development would exacerbate parking problems, including along Drummond Street and elsewhere in the village centre; and would cause congestion along the A85 through Comrie, and at its junction with Bridge Street
- Concerns are raised that the proposal will mean even more traffic down Dalginross, and an overloading of parking places around the shopping area in the village because the proposal is at a distance too far for people to carry shopping home (0561/01/001)
- Concerns raised about existing parked vehicles detracting from the amenity of the village and therefore adding another 30 to 50 households would be undesirable
- Braco Road and South Crieff Road are narrow and very windy roads (0223/01/001)

H58 adverse impact on village character and infrastructure

- Over the last 50 years the village has increased in size by over 50%, therefore all the attributes that make Comrie what it is and identified in LDP description are under threat
- The proposal would extend the built-up area counter to conservation area status (0231/01/001)
- The proposed density is out of keeping with the surrounding areas and the conservation village as a whole. Fails to preserve and enhance village's character and appearance (0342/01/001) (0354/01/001) (0582/01/001)
- A development of this size would alter the nature of the village atmosphere, which is quite renowned. Comrie is a beautiful conservation village. Comrie is a country village and should not be turned into a dormitory settlement. The community is already under significant pressure
- The village has limited facilities and the proposal would increase pressure on medical centre, water and sewage infrastructure, primary school, post office, village parking, refuse collections and distance to recycling point, public toilet, inadequate play park in the village, the capacity of the sewage plant and water mains are a concern. In particular, problems with a pumping station at Tay Avenue/Dochart Place, and in the area around Strowan Road Medical Centre are highlighted (0197/01/001, 0253/01/001, 0600/01/001)
- Concerns are raised that Comrie medical centre is full to capacity and Crieff Medical centre does not enrol Comrie residents (0397/01/001)
- Concerns are raised that Comrie primary school is full to capacity and already has temporary classrooms that cannot accommodate anticipated rise in school roll
- Insufficient capacity in sewage system
- There are no suitable employment opportunities in the area, which will result in increased commuting by car
- No nearby hospital. Older people place an undue load on medical services; and distances to care and treatment in Perth are great when ill (0230/01/001)
- Does not fulfil any of the criteria of Policy RD1 (a) to (e). Implications on the defining character of the southern end of the conservation area, particularly should 'Top Square' and Cowden Road be modified for increased vehicle use. The un-kerbed wide grass verges are a key historical feature of the conservation area
- The site is currently agricultural land but has amenity value and is used regularly by walkers and horse riders (0194/01/001, 0228/02/001). The site forms part of the Conservation Villages footpaths and rights of ways, used by walkers for decades (0203/01/0014). Adjacent to Bogton Braes Walk.
- The site is in a particularly scenic part of Comrie bordering beautiful woodland and the renowned Bogton Braes. All of this area including the field marked for development is used extensively by many locals and visitors alike for walking and recreation. The proposed development would effectively ruin this stunning area (0649/01/001)
- Loss of this important green space within the settlement boundary, and compromise of safety and usability of a much used all abilities public right of way & Core Path (Cowden Road) would restrict the currently high levels of usage of an important access to the wider countryside (0574/01/002 & 0638/01/006)
- No infrastructure report has been prepared for Comrie to help identify any current shortfall in infrastructure provision or specific constraints to development. A charrette should be held to establish the infrastructure needs of the village
- The nearest sports hall and swimming is at Crieff; the community hall in Comrie is only adequate for current needs

- Nearest supermarket is at Crieff. Local food stores in Comrie cannot keep up with demand (0557/01/001)
- The proposed closure of Royal Bank of Scotland branch will mean Comrie will have limited banking and cash facilities for the existing residents let alone an increased population
- According to Green Destinations, which is a non-profit organisation for sustainable tourism, Comrie is one of the 2017 Sustainable Destinations Top 100 (0081/03/001) This might be questioned or the village could be removed from the list should development of H58 proceed (0344/01/001; 0550/01/002)
- There is a need for affordable housing instead in Comrie (0158/01/001). The houses proposed would be unsuitable due to cost (0197/01/001)
- The additional village population would preclude entry to Scotland in Bloom or UK in Bloom competitions as these are for villages (0201/01/001)
- Concerns raised over lack of information as to the style of the proposed development, including the provision and proportion of low cost housing (0227/02/001)
- Housing developments should be restricted in Areas of Natural Beauty which Comrie certainly is, even if it does not have that title as an official designation (0332/01/001)
- Comrie is the earthquake centre in Scotland with several major faults all meeting up a few thousand feet below the village of Ross. It is not a matter of 'if' but 'when' for the next earthquake to hit Comrie. As such any future developments in Comrie should be limited to the minimum (0332/01/001)

H58 alternative housing land available elsewhere in Strathearn HMA

Respondents state that the justification for inclusion of H58 in LDP1 was on the basis it provided choice but this assertion has been superseded by the availability of better sites at alternative locations:

- The granting of full planning permission for 25 houses at a windfall site at Tomperran, Comrie (Site H415) undermines the requirement for Proposal H58
- There is uncertainty as to the status of three planning applications for housing on land at Tomperran: one of the applications for 10 houses has been granted and remains extant; while two applications for a further 13 houses and 5 houses respectively have not yet been determined. These applications for a total of up to 25 houses should be regarded as windfall and the Proposed Plan should be amended to take them into account (0534/01/002)
- Tomperran site has flat ground and has direct access to the A85 main road, while access to H58 is through the village. The site is within walking distance of the village centre along a public road with pavement. It is on a bus route.
- Development of the site at Tomperran would use up any spare capacity in the sewerage system, and would therefore preclude housing development at H58
- Other more suitable sites free from constraints are available in the tiered settlements at Crieff and Auchterarder, which are nearer to trunk roads and places of employment
- The building of these houses is not required in Comrie and the houses ear-marked for this site should be relocated to somewhere where they are needed and can be absorbed (0651/01/001)

Concerns are also raised in respect of a statement in a recent government budget [not referenced] where developers were urged not to hoard land banks. The potential

developer is urged to reconsider the purchase of the proposed site (0407/01/001)

Comrie Strowan Road new housing site (Site H234)

James Tainsh (0440/01/001): Proposes an amendment to the settlement boundary to include a new housing site east of Strowan Road in the field to the rear of the Comrie Medical Centre and 57-73 Strowan Road. The respondent states that the suggested amendment would be to provide appropriate siting to meet local demand for new low density housing.

J A Burdon-Cooper (0699/01/001): Support for the proposed plan in as far as it does not include the suggestion for a housing development at H234 Dalginross Moor. Opposed to the suggested expansion of the housing stock unless there was a proven requirement to provide housing for local residents (not those from other parts of Perth & Kinross). Any expansion that did take place could probably be provided by judicious infill instead of on good agricultural land. Comrie's population could outgrow its infrastructure and another 30-50 houses would make this a real problem. More consideration and wider consultation with local community over a longer timescale is needed. Flood risk analysis is both ambiguous and suspect.

Modifications sought by those submitting representations:

A & J Stephen Limited (0622/01/005): increase the site's capacity to 65 units (49 mainstream private units and 16 affordable units); amend site specific developer requirements to increase density to 17 units per ha.

SEPA (0742/01/056): Support for the Flood Risk Assessment developer requirement.

Derek and Agnes Redfern (0048/01/001; 0048/02/001); John Cook (0050/01/001); Mrs Josephine Moore (0051/01/001); John Dimopoulos (0080/01/001); Crawford Wilson (0081/01/003) (0081/02/003) (0081/03/001) (0081/04/001) (0081/05/001) Ian Loxley (0100/01/001); Nickola Loxley (0101/01/001); Christopher and Janette Begg (0106/01/001); Paul Mouncey and Margaret Douglas (0109/01/001); Carol Mulligan (0121/01/001); Janice Fraser (0158/01/001); Brian Christie (0159/01/001); Ian Stewart (0160/01/001); Kathleen Wilson (0167/01/001); Mrs Florina W MacDougall (0168/01/001); David Wilson (0169/01/001); Mr G E MacPhee (0183/01/001); Ian McIntyre (0184/01/001); Edith McIntyre (0186/01/001); Jane E A Ross (0187/01/001); Patricia Sinclair (0193/01/001); Naomi Nyamudoka (0194/01/001); Henry Glasgow (0196/01/001); Jacqueline Morgan (0197/01/001); Anne Pirie (0198/01/001); Marjorie Gibb (0199/01/001); Mairi Sinclair (0200/01/001); M. Tell (0201/01/001); Mr A D Ross (0203/01/001); Emma Barrie (0223/01/001); Martin Hogg (0227/02/001); Cindy and Steven Glass (0228/01/001) (0228/02/001); David RD Bushby (0230/01/001); Daniel Reeve Simmons (0231/01/001); Brenda Elizabeth Simmons (0232/01/001); Eileen Hogg (0237/01/001); Susan Haggart (0246/01/001); RK Ginsberg (0250/01/001); B. Spratt (0251/01/001); Margaret Spratt (0253/01/001); Matthew Jack (0254/01/001); Anne Lawson (0256/01/001); Alan Laing (0260/01/001); Vanessa Davidson (0276/01/001); Ken Heiser (0278/01/001); Mr A Tod (0285/01/001); Dorothy Briggs (0287/01/001); Elizabeth CF Cromar (0299/01/001); Christine Ross (0300/01/001); Robert Sommers Wood (0301/01/001); Elizabeth Steinka (0302/01/001); Mr C Tod (0303/01/001); Ann Turner (0307/01/001); Jan Parker (0312/01/001); Norman G Hetherington (0316/01/001); Jessie

Downs (0317/01/001); Andrew Lorimer (0327/01/001); Maxwell Penfold (0328/01/001); Fiona Penfold (0330/01/001); Carol A Calder (0331/01/001); John Dewar (0332/01/001); Margaret Rose (0334/01/001); Gillian Allan (0342/01/001) (00342/02/001); Hugh Rose (0343/01/001); Ann Dewar (0344/01/001); Ian Wright (0348/01/001); Georgina Brannan (0351/01/001); Angus Barrie (0352/01/002); James Lambie (0354/01/001); John & Helen Whitelaw (0357/01/001); Mr & Mrs H Anderson (0362/01/001); PM Ann Reith (0365/01/001); Scott Haggart (0368/01/001); Marion Burns (0370/01/001); Christian Campbell (0388/01/001); Graeme A Hendry (0397/01/001); Murray Lauchlan (0401/01/001); William A Lang (0403/01/001); Mary McGillivray (0407/01/001); Robert Turner (0415/01/001); Liam Hegarty (0416/01/001); Cressida Jauncey (0419/01/001); Lynn Manderson & James Wilson (0421/01/001); S Peedle (0434/01/001); William Douglas (0438/01/001); Jamie Jauncey (0443/01/001); Donald McGillivray (0447/01/001); Simon Jauncey (0452/01/001); Richard Murray (0457/01/001); John Young (0460/01/001); Neill Aitken (0464/01/001); Mrs Morag Aitken (0465/01/001); Heather Reid (0467/01/001); Anne Glasgow (0482/01/001); Michael and Christine Taylor (0483/01/001); Debbie Dimopoulos (0488/01/001); J A Reid (0492/01/001); Gillian Lauchlan (0496/01/001); Moira Mathew (0508/01/001); William Gordon Grant (0512/01/001); Mr & Mrs G R Grant (0514/01/001); Mary Wilson (0523/01/001); Comrie Community Council (0534/01/001 & 002); RM Ferguson (0543/01/001); Jim Guild (0545/01/001); David Scott-Angell (0550/01/002); Marie Macdonald (0557/01/001); E. Morag Crabbie (0561/01/001); Marc Di Rollo (0573/01/001); Andrew Thompson (0574/01/002 & 0574/01/003); Pauline Toole (0576/01/001); John Davidson (0578/01/001 & 0578/02/001); Joe Toole (0579/01/001); Miss J H McDowall (0582/01/001); Agnes Drysdale (0585/01/001); Leslie W Paterson (0586/01/001 & 0586/01/003); R. Campbell (0600/01/001); John MacInnes Drysdale (0627/01/001); Felicity Martin (0638/01/001-12); Margaret O McVicar (0644/01/001); Kathleen McIntyre (0645/01/001); Evelyn Temple (0646/01/001); Peter McArthur (0647/01/001); Helen McArthur (0648/01/001); James S Arnott (0649/01/001); Maureen A Arnott (0650/01/001); Robin D Arnott (0651/01/001); Catriona Cleghorn (0652/01/001); Martin Gray (0658/01/001); Veronica S McChesney (0676/01/001); Janet Heiser (0680/01/001); Mairi Philp (0681/01/001); Tessa Ingleby (0706/01/001); C Hendry (0709/01/003): Delete proposal H58

Matthew Jack (0254/01/001); Anne Lawson (0256/01/001); John and Madeleine King (0318/01/001); Malcolm Allan (0329/01/001); Gillian Allan (0342/01/001); Lynn Manderson & James Wilson (0421/01/001); Michael and Christine Taylor (0483/01/001); Andrew Thompson (0574/01/002); Miss J H McDowall (0582/01/001): Amend plan to restrict the number of units

Robert Bruce Findlay (0190/01/001): No specific amendment is sought

Francis Haig Hamilton (0209/01/001): Amend plan to require Cowden Road from H58 to South Crieff Road to be adopted

Fiona Cumming (0219/01/001); Lauren Mcallister (0220/01/001); Callum Cumming (0221/01/001); Alex Urquhart (0267/01/001); Mary Knox (0326/01/001): No specific amendment is sought

Perth and Kinross Heritage Trust (0272/01/005): Amend H58 developer requirements to require an archaeological investigation and / or protection of scheduled monuments

Woodland Trust Scotland (0462/01/005): No specific amendment is sought

Tessa Ingleby (0706/01/001): Amend plan to identify the site as a wildlife conservation area instead of housing proposal

Comrie Strowan Road new housing site (Site H234)

James Tainsh (0440/01/001): Amend the plan to include a new 1.07 Ha housing site (H234)

J A Burdon-Cooper (0699/01/001): No specific amendment is sought

Summary of responses (including reasons) by planning authority:

Land at Cowden Road (Proposal H58)

This site was originally suggested by A & J Stephen and the (then) landowner Mr Martin Robb, and Proposal H58 was first allocated following examination of the 2012 Proposed Plan.

A & J Stephen Limited (0622/01/005): The methodology for calculating the site's capacity is the same across all the housing proposals in the Proposed Plan. This issue is considered along with the other issues raised in respect of housing strategy since it relates to housing strategy across the LDP area, and not solely to the settlement of Comrie

For this site, the Council has assumed that the site will eventually be developed at a low to medium density, between 16-25 dwellings per hectare. In terms of the developable area at the site, there is a developer requirement to provide protection and enhancement to the woodland at the south and eastern boundaries. On this basis a developable percentage of 55% of the site is assumed. This gives a calculation of estimated capacity as follows:

Developable area of 55% of 3.8 ha => 2.1 ha x low-to-medium range (16-25 dwellings per hectare) => capacity range of between 32-52 units.

A & J Stephen Limited suggests the development mix will comprise smaller single storey houses that would be more appropriate for the local market. The Council anticipates that this means houses aimed at older people downsizing (possibly from larger properties in the village) and first time buyers. The Council does not have any issues with the type of house proposed at the site, but wishes to maintain a low-to-medium density that is capable of meeting the developer requirements set out for the site.

No modification is proposed to the Plan in respect of the capacity of H58.

Representations against Proposal H58

Derek and Agnes Redfern (0048/01/001; 0048/02/001); John Cook (0050/01/001); Mrs Josephine Moore (0051/01/001); John Dimopoulos (0080/01/001); Crawford Wilson (0081/01/003) (0081/02/003) (0081/03/001) (0081/04/001) (0081/05/001) Ian Loxley (0100/01/001); Nickola Loxley (0101/01/001); Christopher and Janette Begg (0106/01/001); Paul Mouncey and Margaret Douglas (0109/01/001); Carol Mulligan (0121/01/001); Janice Fraser (0158/01/001); Brian Christie (0159/01/001); Ian Stewart

(0160/01/001); Kathleen Wilson (0167/01/001); Mrs F W MacDougall (0168/01/001); David Wilson (0169/01/001); Mr G E MacPhee (0183/01/001); Ian McIntyre (0184/01/001); Edith McIntyre (0186/01/001); Jane E A Ross (0187/01/001); Patricia Sinclair (0193/01/001); Naomi Nyamudoka (0194/01/001); Henry Glasgow (0196/01/001); Jacqueline Morgan (0197/01/001); Anne Pirie (0198/01/001); Marjorie Gibb (0199/01/001); Mairi Sinclair (0200/01/001); M. Tell (0201/01/001); Mr A D Ross (0203/01/001); Francis Haig Hamilton (0209/01/001); Emma Barrie (0223/01/001); Martin Hogg (0227/02/001); Cindy and Steven Glass (0228/01/001) (0228/02/001); David RD Bushby (0230/01/001); Daniel Reeve Simmons (0231/01/001); Brenda Elizabeth Simmons (0232/01/001); Eileen Hogg (0237/01/001); Susan Haggart (0246/01/001); RK Ginsberg (0250/01/001); B. Spratt (0251/01/001); Margaret Spratt (0253/01/001); Matthew Jack (0254/01/001); Anne Lawson (0256/01/001); Alan Laing (0260/01/001); Perth and Kinross Heritage Trust (0272/01/005); Vanessa Davidson (0276/01/001); Ken Heiser (0278/01/001); Mr A Tod (0285/01/001); Dorothy Briggs (0287/01/001); Elizabeth CF Cromar (0299/01/001); Christine Ross (0300/01/001); Robert Sommers Wood (0301/01/001); Elizabeth Steinka (0302/01/001); Mr C Tod (0303/01/001); Ann Turner (0307/01/001); Jan Parker (0312/01/001); Norman G Hetherington (0316/01/001); Jessie Downs (0317/01/001); John and Madeleine King (0318/01/001); Andrew Lorimer (0327/01/001); Maxwell Penfold (0328/01/001); Malcolm Allan (0329/01/001); Fiona Penfold (0330/01/001); Carol A Calder (0331/01/001); John Dewar (0332/01/001); Margaret Rose (0334/01/001); Gillian Allan (0342/01/001) (00342/02/001); Hugh Rose (0343/01/001); Ann Dewar (0344/01/001); Ian Wright (0348/01/001); Georgina Brannan (0351/01/001); Angus Barrie (0352/01/002); James Lambie (0354/01/001); John & Helen Whitelaw (0357/01/001); Mr & Mrs H Anderson (0362/01/001); PM Ann Reith (0365/01/001); Scott Haggart (0368/01/001); Marion Burns (0370/01/001); Christian Campbell (0388/01/001); Graeme A Hendry (0397/01/001); Murray Lauchlan (0401/01/001); William A Lang (0403/01/001); Mary McGillivray (0407/01/001); Robert Turner (0415/01/001); Liam Hegarty (0416/01/001); Cressida Jauncey (0419/01/001); Lynn Manderson & James Wilson (0421/01/001); S Peedle (0434/01/001); William Douglas (0438/01/001); Jamie Jauncey (0443/01/001); Donald McGillivray (0447/01/001); Simon Jauncey (0452/01/001); Richard Murray (0457/01/001); John Young (0460/01/001); Neill Aitken (0464/01/001); Mrs Morag Aitken (0465/01/001); Heather Reid (0467/01/001); Anne Glasgow (0482/01/001); Michael and Christine Taylor (0483/01/001); Debbie Dimopoulos (0488/01/001); J A Reid (0492/01/001); Gillian Lauchlan (0496/01/001); Moira Mathew (0508/01/001); William Gordon Grant (0512/01/001); Mr & Mrs G R Grant (0514/01/001); Mary Wilson (0523/01/001); Comrie Community Council (0534/01/001 & 002); RM Ferguson (0543/01/001); Jim Guild (0545/01/001); David Scott-Angell (0550/01/002); Marie Macdonald (0557/01/001); E. Morag Crabbie (0561/01/001); Marc Di Rollo (0573/01/001); Andrew Thompson (0574/01/002, 0574/01/003 & 0574/01/004); Pauline Toole (0576/01/001); John Davidson (0578/01/001 & 0578/02/001); Joe Toole (0579/01/001); Miss J H McDowall (0582/01/001); Agnes Drysdale (0585/01/001); Leslie W Paterson (0586/01/001 & 0586/01/003); R. Campbell (0600/01/001); John MacInnes Drysdale (0627/01/001); Felicity Martin (0638/01/001-12); Margaret O McVicar (0644/01/001); Kathleen McIntyre (0645/01/001); Evelyn Temple (0646/01/001); Peter McArthur (0647/01/001); Helen McArthur (0648/01/001); James S Arnott (0649/01/001); Maureen A Arnott (0650/01/001); Robin D Arnott (0651/01/001); Catriona Cleghorn (0652/01/001); Martin Gray (0658/01/001); Veronica S McChesney (0676/01/001); Janet Heiser (0680/01/001); Mairi Philp (0681/01/001); Tessa Ingleby (0706/01/001); C Hendry (0709/01/003)

Other representations received to the Proposed Plan in respect of this proposal focus on the following planning issues:

- compatibility with TAYplan hierarchical settlement approach and whether the proposal is needed;
- impact of additional housing on community facilities and infrastructure;
- impact on amenity of neighbouring residential properties;
- loss of agricultural land;
- effect on wildlife and biodiversity;
- flood risk; and
- provision of access
- archaeological investigation

Compatibility with TAYplan hierarchical settlement approach; and whether the proposal is needed

To be consistent with TAYplan strategy, the Proposed Plan seeks to allocate most of the housing development for the Strathearn housing market area to the principal settlements of Crieff and Auchterarder.

Both Crieff and Auchterarder have a significant supply of effective housing land and have proposals for further allocations.

TAYplan Policy 1 Location Priorities allows that the Proposed Plan may also provide for some development in settlements that are not principal settlements (such as Comrie) where this can be accommodated and supported by the settlement. Comrie has a good range of services and is the largest village in the Strathearn Housing Market Area. At the 2011 census, the population of Comrie was 1,927 and there were 1,021 houses. In the seven years between April 2011 and March 2018 there have been only 11 house completions in the village (CD049). Were this site developed to the maximum capacity indicated in the plan this would represent only a 5% increase in housing numbers in the settlement.

The Proposed Plan is therefore consistent with TAYplan by locating the main allocations in the principal settlements, and providing for some development in Comrie. This issue is dealt with in more detail in the Schedule 4 on housing land strategic issues.

Some representations question the need for any more housing in Comrie. In terms of housing need within the affordable housing it is clear from the Council waiting list that there is a high level of need in the area. Data collated as of 8 August 2018 indicates that there are 109 families on the list. The relatively low number of house completions in the village should not be taken as evidence of low demand. Comrie is likely to be a popular market area with a healthy demand for new houses.

No modification is proposed to the Plan.

Impact of additional housing on community facilities and infrastructure

Many respondents feel that the community facilities and village infrastructure would be under unacceptable pressure should H58 be developed.

Although reported to be suffering from poor facilities by some respondents, Comrie is a relatively healthy and vibrant local centre and has a good range of community facilities including a shopping street, medical centre, post office, church, community centre, a

primary school and hotels and restaurants. There is a good network of outdoor recreation facilities, core paths and informal paths around the village. The Proposal for a modest amount of additional housing in the village would support the provision of these community facilities and help maintain their viability.

It is acknowledged that some respondents raise concerns that the range of facilities is not as wide as it used to be, citing the closure of the RBS bank branch and that it lacks a supermarket and a sports hall/swimming pool. However the village is linked by public transport to Crieff and Perth, which are larger settlements containing the facilities cited as lacking in Comrie. Some of the facilities mentioned by respondents as desirable for the village such as a supermarket and larger sports and swimming centre are unlikely to be capable of being supported by a village of the scale of Comrie.

The village primary school has spare capacity and there is a relatively new community campus for secondary education at nearby Crieff. In terms of medical centre capacity, NHS Tayside was represented as a key agency and raised no concerns.

In terms of the safety and operation of the road network, the Council as roads authority accepts that the Proposal can be accommodated into the local road network.

The issue of affordable housing is covered elsewhere in Policy 20 and related Supplementary Guidance.

In terms of whether there is sufficient water and sewerage capacity in the village, Scottish Water was represented as a key agency and raised no concerns.

No modification is proposed to the Plan in respect of community facilities and infrastructure.

Impact on amenity of neighbouring residential properties

Several respondents make representations describing the impact the Proposal would have on its neighbours. Some call for a buffer area between the houses on the south side of Polinard that are to the north of H58. Specific concerns are raised in respect of noise and light pollution, air pollution, loss of green space, impact of two storey development on adjacent single storey houses, and local sewerage arrangements for nearby houses.

The Proposed Plan contains a number of policies that protect the amenity of neighbouring properties where development is proposed in an area. Policies on placemaking (policy 1), open space provision (policy 14), and residential development (policy 17) seek to ensure that development complements its surroundings. And there are policies to protect impacts to listed buildings (policy 27) and conservation areas (policy 28). Environmental protection policies on light pollution (policy 53), noise pollution (policy 54) and air quality (policy 55) will address the concerns raised in respect of these issues.

In particular, these policies will be used at the planning application stage to assess the impact of any proposed development on neighbouring residents.

Some respondents express concerns about the impact of new development on the conservation area, however the site is at some distance from the conservation area and apart from the potential for junction improvements at Upper Square mentioned in the

following paragraphs on access to the site, there would be few impacts on the conservation area.

No modification is proposed to the Plan in respect of the impact of amenity on neighbouring residential properties.

Loss of agricultural land

Policy 48 of the Proposed Plan states that outside the identified settlements, development on prime agricultural land will not be permitted except in certain special circumstances set out in the policy. Proposal H58 is inside not outside the settlement boundary and therefore the policy does not strictly apply; and the land is category 3.2 land capability for agriculture, which is non-prime agricultural land.

While it is acknowledged that it is preferable to prioritise the development of brownfield sites over greenfield sites, there is a very limited supply of brownfield land in Comrie and in the Strathearn Housing Market Area.

No modification is proposed to the Plan regarding loss of agricultural land in respect of Proposal H58.

Impact on wildlife and biodiversity

It is accepted that the proposal involves development of a greenfield site but the Council's site assessment notes that the site is usually under agricultural cultivation, which means that most of the wildlife and biodiversity value will be located at the field's periphery and in the hedges and paths around the field.

The Proposed Plan contains a suite of policies 36-56 that aim to conserve and enhance the natural environment. In addition and as already discussed above, the Council has assumed that the site will be developed at a low to medium density and a developable percentage of 55% of the site is assumed. This leaves potential to introduce a more varied range of habitats thus improving biodiversity to at least part of the site on areas reserved for sustainable drainage, landscaping and screening.

There are concerns about woodland to the east of the proposal however the Plan contains no proposals at that location.

No modification is proposed to the Plan in respect of wildlife and biodiversity.

Flood risk

Comrie does have a history of flood risk arising from the confluence of the three rivers in the centre of the settlement. A village flood defence scheme is in preparation that will protect the vulnerable areas however the scheme has not been designed to offer any protection to the site of Proposal H58 because no flood risk exists at that location from those rivers.

Although the area is reported to be poorly drained, the site is not specifically identified as being at risk of flooding. SEPA and the Council's flood officer consider it suitable for development subject to the submission of a flood risk assessment with any planning

application, which is proposed as a developer requirement. The site will not increase flood risk elsewhere in the village and therefore there is no need to defer its development until the flood defence scheme is complete.

No modification is proposed to the Plan is proposed in respect of flood risk to H58.

Provision of access

Several respondents raise concerns over the uncertainty as to how access to H58 may be taken, some stating that access issues are insurmountable. A number of the respondents do not seek specific changes to the Proposed Plan but do not wish the Proposal to remain in the Plan if the issue of access remains unresolved.

Cowden Road adjoins the Proposal but it is not an adopted road. The prospective developer, A & J Stephen, asserts ownership of Cowden Road and the site specific developer requirements are that access must be from the public road. There are two possible routes by which the site may be accessed: from an upgraded and adopted length of Cowden Road leading from Proposal H58 to its junction with Upper Square; or via the adopted Langside Drive across the width of Cowden Road.

Access to the site has previously been considered as part of LDP1 examination, where the reporter considered that while the uncertainty over the nature of the access to be provided is a matter of concern to local residents, “These are matters that will require to be resolved during the planning application process but are not sufficient to warrant removal of the site from the Proposed Plan. However, should development of the site be held up due to an inability to resolve this issue, the designation can be reconsidered in the subsequent review of the local development plan.” [LDP1 examination report p826].

Having had sight of the prospective developer’s title plan for Cowden Road, the Council as planning authority and roads authority is confident that the developer has demonstrated that they can deliver a connection to the public road to adoptable standard.

Taking the first of the two options, via an upgraded Cowden Road, this would technically be possible. There would be obstacles to be overcome including the road’s varying width, the presence of mature trees however, the Council considers these are not insurmountable obstacles.

Turning to the junction of Cowden Road with Upper Square, alterations to the road would also be required at this location to ensure it is of adoptable standard but these would not be significant works. However any work to the road has potential to impact on the Comrie Conservation Area, which includes Upper Square together with an area east of Cowden Road including Comrie Cottage, Field Cottage and Crossloan (but not Broomfield on the west side of Cowden Road); and work has potential to impact on the setting of the listed buildings in the vicinity – these are the Category C listed Comrie Cottage south of Upper Square, and Bracklinn north of the square. Having regard to the likelihood of the type work that would be required, it is anticipated that this can be carried out whilst, through good design, safeguarding the character of the Conservation Area.

The second option, via the adopted Langside Drive, would clearly be shorter and likely to involve less work. The respondents in opposition to this route argue that if this route were to be opened, there would be no physical nor regulatory barriers that could prevent traffic

opting to travel along Cowden Road. This is acknowledged but not considered an issue as long as Cowden Road is brought up to adoptable standard as this route is likely to serve the predominant desire line for most journeys. Indeed from Designing Streets and placemaking perspectives, multiple accesses are to be encouraged.

There is a third-party option that was suggested in representation (0329/01/001), which is for a new road connecting Proposal H58 with South Crieff Road at the cemetery boundary wall. This does not have landowner support and would not meet the terms of Policy 1 Placemaking, specifically the creation of a coherent structure of streets spaces and buildings accessible from its surroundings. The Council therefore does not support this suggestion.

This issue of access will require to be clarified, but the Council suggests that this be resolved during the planning application process. The Council is confident that access may be taken, via either or both the options described. And that the allocation should not therefore be removed from the Plan on this basis.

In terms of the title plan that was exhibited to the Council by the prospective developer referred to above, it is acknowledged that this was not submitted as part of a representation to the Proposed Plan. It does not therefore form part of the Proposed Plan examination. However a public copy may be obtained for the reporter on request; potentially sourced from either the developer or the Keeper of the Registers of Scotland.

No modification is proposed to the Plan in respect of the provision of access to H58.

Archaeological investigation

Perth and Kinross Heritage Trust (0272/01/005): The Perth and Kinross Heritage Trust is the Council's adviser on archaeological issues, and has found that following assessment of the Proposal, there is a need to add a developer requirement for an archaeological investigation and/or protection of scheduled monuments.

In the area, Comrie has an identified Roman fort and camp to the west of the Proposal, and the Dunmoid stone circle, a Scheduled Monument (ref. SM1542).

The Proposed Plan contains policy 26 that deals with Scheduled Monuments and non-designated archaeology. The policy presumes against development that would have an adverse effect on Scheduled Monuments, and it seeks to protect areas of known archaeological interest.

No modification to the Plan is proposed, however there is value in the Perth and Kinross Heritage Trust's suggestion, particularly since the potential for archaeology in the area may have been overlooked to date. Should the reporter be considering a modification to include the Trust's suggested developer requirement, the Council would be comfortable in accepting such a recommendation.

H58 other issues

A limited number of other issues are raised in respect of Proposal H58 including:

- the village's status as a low carbon area
- impact on Top Sustainable Destinations tourism recognition;

- the impact of power cables across the site on peoples' health;
- concerns as to whether enough sunlight falls on the site due to shading from woodland on adjacent land in separate ownership;
- poor parking by visitors to Langside Drive and fast driving on Braco Road;
- driver confusion at the existing junction at Upper Square;
- the cost of the proposed houses;
- risk of earthquakes; and
- developers hoard land banks.

None of these representations seek any changes to the Proposed Plan and they are therefore considered to be outwith the scope of the LDP examination.

No modification is proposed to the Plan.

H58 alternative housing land available elsewhere in Strathearn HMA

Site H415 at Tomperran has been introduced by several third parties. It is suggested this site would be more suitable for housing than Proposal H58. No representation has been received from the landowner. This is understandable however since all parts of the 1.96 Ha site are covered by either a planning consent for housing (07/02255/FLL – development is thought to have commenced to prevent the permission lapsing, but no houses have been built yet); or by two separate planning applications for housing (14/01917/FLL – granted 15 February 2018; & 16/01599/FLL – awaiting decision).

There is a history of planning consents at this site, the most recent of which was granted after the publication of the Proposed Plan. The three application sites overlap, meaning that when they are combined it is estimated that the site has an effective capacity of 23.

In the absence of a representation by the landowner or a developer seeking an allocation as a proposal it would be inappropriate to do so; and bearing in mind that planning permission has already been granted for parts of the site, it may also be unnecessary.

No modification is proposed to the Plan.

Comrie Strowan Road new housing site (Site H234)

James Tainsh (0440/01/001): This site was the subject of a pre-MIR call for sites housing submission (Comrie 2) on behalf of the landowner. The submission noted that Comrie has excellent services and facilities and that additional housing would help local infrastructure and services, sustain bus services, provide developer contributions towards education and affordable housing, sustain construction jobs and allow home/work properties to be developed. While the proposal was submitted during pre-MIR call for sites stage the Council did not take it forward into either the MIR or the Proposed Plan. The site has therefore not had the benefit of full public consultation.

Comrie is not identified as one of the TAYplan tiered settlements and since there is already a housing site identified in Comrie with sufficient capacity for the Plan period it is considered that there is no immediate need to allocate site H234 as a housing site.

In terms of comparing the relative merits of Proposal H58 and site H234, the Council considers that Proposal H58 offers significant advantages. It sits in a better landscape

framework; it can be made accessible from more than one access road (both Cowden Road and Langside Drive); it is being promoted by a developer; it has been the subject of previous Local Development Plan consultations for housing; it is inside the settlement boundary and it has previously been allocated for housing (albeit for fewer units) in the Adopted Local Development Plan. Site H234 does not benefit from an existing landscape framework; it is being promoted speculatively without apparent support from a developer; it has not had the benefit of public consultation; and in the absence of such consultation its location outside the proposed settlement boundary confers a reasonable expectation that the site will remain free from development.

No modification is proposed to the Plan.

List of planning applications referred to

07/02255/FLL Erection of 10 dwellinghouses at Tomperran Farm Comrie (approved)

14/01917/FLL Erection of 13 dwellinghouses and garages at Land 80 Metres North West Of Tomperran Farm Comrie (approved)

16/01599/FLL Erection of 5no. dwellinghouses and garages at Land 40 Metres North West Of Tomperran Farm Comrie (awaiting decision)

There is some degree of physical overlap between these three planning applications and when combined it is estimated that the site referred to has an effective capacity of 23.

Reporter's conclusions:

Reporter's recommendations: