



# Perth and Kinross Local Development Plan Main Issues Report

## QUESTIONS FORM

The preferred method of making representations is using the online Main Issues Report at [www.pkc.gov.uk/MainIssuesReport](http://www.pkc.gov.uk/MainIssuesReport)

Please read the notes below before completing this form. Completed forms should be returned to the Local Development Plans Team:

[DevelopmentPlan@pkc.gov.uk](mailto:DevelopmentPlan@pkc.gov.uk)

Local Development Plan Team  
Perth and Kinross Council  
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### Notes

1. Use this form to help you set out any representations that you would like to make about the Main Issues Report. You can make representations on any part of the document or you can suggest other issues that you feel should be included. The important thing is that we know what the representations are about and how we can contact you.
2. The consultation period will last until **Friday 11 January 2011** and it is essential that you ensure that representations are with us by then.
3. To comply with the Freedom of Information (Scotland) Act 2002 your representations cannot be treated as confidential.
4. Representations received on this Main Issues Report will be taken into account in preparing the Proposed Local Development Plan which is due to be published in December 2011.
5. Your representations will be considered as part of the Local Development Plan preparation process and will be processed by employees of Perth & Kinross Council's Environment Service. Representations and any information you provide will be available for public inspection, published online and may be shared with other appropriate professionals and service providers. Under the terms of the Data Protection Act 1998 you are entitled to know what personal information Perth and Kinross Council hold about you, on payment of a fee of £10.
6. Once we have your representations we will acknowledge them and inform you when the Proposed Local Development Plan is published.
7. This form is also available on the Council's web site see address above.

## Perth and Kinross Local Development Plan Main Issues Report QUESTIONS FORM

Please complete using **black ink** so we can copy the form if necessary.

### Part 1 Contact Details

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### Part 2 Questions

## Chapter 4: Main land Use and Delivery Issues

### Section 4.2 Housing Supply and Distribution

Q1. Do you agree that the LDP should seek to provide a 7 year effective housing land supply? Please provide reasons for you answer. (Pages 33-34, paragraphs 4.2.1-4.2.6)

No comment

Q2. Do you agree with the proposed adjustments to the TAYplan MIR housing requirement, namely a 10% reallocation from the Kinross HMA to the Perth HMA, and an assumption that 15% of the overall housing requirement in the Highland HMA will come from small sites? If not, please provide a justification. (Pages 35-37, paragraphs 4.2.7-4.2.11)

We welcome the approach of re-allocating housing land requirements to avoid significant environmental impact, and recognition that Kinross-shire is an area of high environmental constraints. Developments in environmentally sensitive locations may have to meet stricter environmental standards. We recommend that the policy emphasis is based on environmental capacity to allow flexibility to move development from areas where there are stricter environmental requirements for development rather than a specific 10% reallocation. We are unclear as to how this percentage has been arrived at in terms of determining environmental capacity.

Q3. Do you agree with the assumption that 10% of the overall housing land requirement will be met by windfall sites? If not please provide a justification. (Page 37, Paragraph 4.2.12)

No comment.

Q4. Do you agree with the proposal to apply minimum density policies to larger Greenfield sites of over 2ha? Please give reasons for you answer. Are the density ranges suggested in the figure 14 appropriate? If not, why not? (Pages 38-39, paragraphs 4.2.15-4.2.17)

We acknowledge the limited brownfield land in the plan area and welcome the principle of this policy in encouraging higher densities on greenfield sites where appropriate. We also welcome the approach of

ranges of density but consider reduction of land take is one of several factors which the LDP should take into consideration when planning more sustainable places.

For example, another object could be to create a more walkable mixed environment. This would combine residential, retail, and business use with greenspace and local services used daily within a 5 minute walk (300-400m). In built-up areas this translates to densities of 50-70 households per hectare (h/ha) or more with at least 2ha of good quality greenspace<sup>1</sup>. Suburban densities can be 35-55 h/ha and rural densities 30-40 h/ha<sup>2</sup>. Higher densities can be achieved without 'cramming' and high-rise. The figures should not be applied unthinkingly, and should take account of other infrastructure such as access to public transport, green networks and greenspace. By its nature, lower density zoned developments can deter walking and cycling.

Q5. Do you agree with the policy of requiring 25% of sites to contribute towards Affordable Housing, including in Perth City Centre? (Pages 41-42, paragraphs 4.2.25-4.2.27)

No comment.

Q6. Do you support the inclusion of the 2009 Housing in the Countryside policy in the LDP? If not, what changes would you like to see and why? (Page 43, paragraphs 4.2.31-4.2.32)

We would like to see the Housing in the Countryside policy revised in the LDP. We commented on the draft of the 2009 Housing in the Countryside policy in March 2009. A key comment still outstanding is the need to strengthen the emphasis on restoration rather than replacement of houses – section 4 of our response:

*"4. Renovation or replacement of houses*

*a) 'Restoration rather than replacement will be favoured.....' ...*

*As the policy is being reviewed due to the growing concern over the loss of structurally sound and traditional farm houses, we would recommend that the wording is strengthened, so that there would be a strong presumption against replacement of houses...."*

We welcome the intent to include a tighter policy for areas with specific environmental issues e.g. Lunan and Loch Leven catchments (ref chapter 5). While this may be possible to build into the Policy, please also refer to our comments re. Q's 39 and 51.

Q7. Do you agree with the principle of not identifying settlement boundaries for the smallest settlements? Please give reasons for your answer. (Page 43, paragraphs 4.2.31-4.2.32)

We do not agree as this might result in uncontrolled expansion of the 'smallest settlements'. This may result in negative impacts on the landscape settings of small settlements, eg. in NSAs, AGLVs and where there may be a detrimental impact on landscape character and capacity. The Housing in the Countryside policy aims to guide development to those places where existing services can be supported and para 4.2.31 states that these smallest settlements are not served by village facilities.

### **Section 4.3 Economic Development**

Q8. Do you agree with the assessment of additional economic development land required in the Plan period? Please give reasons for your answer. (Pages 43-44, paragraphs 4.3.1-4.3.3)

1[1] e.g. Richard Rogers (2007) urban task force.  
[http://www.richardrogers.co.uk/Asp/uploadedFiles/Image/2832\\_urban\\_task\\_force\\_research/RSHP\\_A\\_JS\\_2832\\_L\\_E\\_MP.pdf](http://www.richardrogers.co.uk/Asp/uploadedFiles/Image/2832_urban_task_force_research/RSHP_A_JS_2832_L_E_MP.pdf) (Accessed 17 June 2010)

2[2] E.g. Fionn Stevenson & Nick Williams (June 2007) Sustainable Housing Design Guide for Scotland. Sustainable Development Commission and Communities Scotland <http://www.scotland.gov.uk/Topics/Built-Environment/Housing/investment/shdg/> (Accessed 1 September 2010)

We note the intent to include an estimated 8.84 ha of additional employment land in Kinross area. The Kinross wastewater treatment works is already beyond hydrological capacity. Any additional connections to this will require an upgrade in these facilities.

**Q9. Do you agree with to proposal to retain existing economic development land? If not, what alternative approach would you suggest? (Pages 44-45, paragraphs 4.3.5-4.3.7)**

No comment.

**Q10. Do you support the principles of providing for mixed use development by locating business land in or close to existing residential areas? Do you think that it would assist with the deliverability of employment land? (Pages 45-46, paragraphs 4.3.8-4.3.13)**

We encourage the development of sustainable places, and one of the ways this can be achieved is via mixed use developments where appropriate. However, these need to be carefully planned and we refer to Tayplan's emerging placemaking guidelines as to how LDPs can achieve this.

We recommend the LDP sets the future vision or agenda for settlements. This would help ensure that the outcome is 'the right development in the right place' [SPP para 35]. This is a comment we made in our initial consultation for the LDP, planning for a joined-up way forward with respect to new housing and settlement growth. Green network objectives should be built into overall settlement strategies including mixed use developments. Please also see our comments under Q17 re LDPs roles in identifying, retaining and enhancing green infrastructure.

**Q11. Do you agree that there should be a specific policy to support key tourist destination resorts? (Pages 46-47, paragraphs 4.3.16-4.3.19)**

We support a criteria based policy framework for tourism proposals which includes adequate protection and enhancement of the high quality natural environment. However, where it is known that there is a demand in a specific acceptable location, we also support allocating land for tourism opportunities as a way of directing development to appropriate locations and limiting the scope and size of those allocations, taking into account potential environmental impacts.

**Q12. Do you support the development of a flexible criteria-based framework to encourage tourism-related businesses? (Page 47, paragraph 4.3.20)**

See question 11.

**Q13. Do you agree with the policy approach to support key rural businesses? (Page 48, paragraphs 4.3.21-4.3.23)**

We support the proposed policy approach for businesses within or adjacent to settlements, and the development of a criteria based approach if a rural location is sought. This should include sustainability, landscape and other natural environment considerations.

**Q14. Vacant and redundant farm buildings tend to be redeveloped for housing rather than business uses. Should more be done to reuse them for farming or other employment purposes? (Page 48, paragraphs 4.3.21-4.3.23)**

Whatever the conversion end use, the overall aim should be to restore / redevelop redundant farm buildings in a way that is in keeping with local landscape character and retain/enhance the natural heritage value. Please refer to our comments on the Housing in the Countryside Policy above.

Q15. Should tourism and or business application be required to make provision for accommodation for their work force, either through dedicated staff accommodation or by the provision of affordable housing in the local area? If so should this be applied to all scales of development or only larger scale proposals? (Pages 48-49, paragraphs 4.3.24-4.3.25)

No comment

Q16. Do you support the proposed strategy for retailing? If not, what alternative would you suggest? (Pages 49-50, paragraphs 4.3.26-4.3.32)

We support the proposed strategy emphasis on the city centre as a sustainable, vibrant and high quality environment.

#### **Section 4.4 Green Infrastructure**

Q17. Do you support the approach proposed to protect and enhance the landscape quality of Perth and Kinross? Please give reasons for your views. (Pages 50-52, paragraphs 4.4.1-4.4.14)

Please note we have provided some comments on the proposed site allocations in the Spatial Strategy in the MIR but note this is site-led rather than proactive. We have some concerns about this approach and are encouraging landscape capacity/character based assessments and a more planned settlement strategy and "placemaking" approach to guide the development allocations in the LDP.

Re para 4.4.14, we broadly support the preferred approach to landscape but additional green infrastructure policy is needed. We have the following comments and would be very happy to advise further:

##### **Landscape Character:**

The preferred approach should include a landscape character policy. The Tayside Landscape Character Assessment (Tayside LCA) still provides a robust basis for decision making. However it might need some refreshing/refining for particular pieces of work and given the significant growth areas proposed. In particular:

1. Perth; An updated / refreshed landscape capacity study and green belt study, based on David Tyllesley & Associates 2000 Green Belt and Landscape Capacity Studies and incorporating strategic green network objectives.
2. Other main settlements (Crieff, Blairgowrie, Aberfeldy, Pitlochry, Kinross...). There is no existing capacity work for these towns. We encourage PKC could plan more strategically for the longer-term expansion of these settlements taking green network objectives into account and recommend a settlement capacity study for these towns. The most favourable sites could be prioritised and land could be progressively released for future development.
3. Smaller settlements. Recommend that the Council carries out in house landscape capacity / green network assessments. SNH could support in-house training for this, possibly developing a template which could be used to assess the capacity of smaller settlements as the need for expansion arises.

##### **Local Landscape Designation Review/ identify and protect landscape features of significance:**

The reference to local landscape designations is slightly unclear. Scottish Planning Policy (SPP) and SNH/HS methodology note that local landscape designations should consider landscape character as well as scenic quality and Viewpoints. Elements such as landscape character (Tayside LCA), wildness and historic landscapes should be considered. We are happy to support the Council in applying this methodology and in developing an up to date suite of local landscape designations.

**Green Belt:** see also Q24 below. The preferred inner and outer boundaries have been shown in 5.2.8 in advance of the process of definition which is suggested in 4<sup>th</sup> bullet point para 4.4.14. As stated above, we would support a study to provide a robust rationalisation for the definition these boundaries.

**Supplementary Guidance:** as well as guidance for those uses stated, we encourage the Council to prepare Supplementary Guidance on landscape character and design in the landscape. We would be pleased to advise further on the development of Supplementary Guidance for large (over 20MW) and small-scale windfarms.

**Green Infrastructure:** This Section 4.4 is headed 'Green infrastructure' but there is little explanation as to how this is to be implemented. There is a lack of reference to other green infrastructure components (such as playing fields, SUDS). Para 130 of SPP states that Development Plans should identify and promote green networks, and we strongly support the incorporation of this in the LDP.

The preferred approach should include "implement a multi functional green infrastructure network as part of a settlement strategy. This includes identifying, retaining and enhancing a network within and connecting settlements which contributes to quality, sustainable places."

Green networks should be planned at a strategic level, looking at their functions as part of a settlement strategy and linking settlements. The green space network has many functions; for example it can be used to:

- Enhance new development and create quality, distinctive places and landscape setting
- Provide walking routes and sustainable transport alternatives, promoting healthy lifestyles and carbon reduction.
- Connect habitats and increase biodiversity

As above, we also encourage a strong settlement strategy in the LDP. We refer to SPP which states that *'...the settlement strategy set out in the development plan should promote a more sustainable pattern of growth for an area, taking account of the scale and type of development pressure and the need for growth and regeneration. The most effective way to plan for change will depend on many factors, including geography, environmental sensitivities, landscape character and infrastructure capacity (para 40). In addition the settlement strategy should, among other issues, consider '...the protection and enhancement of landscape, natural and built and cultural heritage, biodiversity and the wider environment....'* [SPP para 77].

**Q18. Is the approach being proposed to the protection and enhancement of biodiversity appropriate? If not, why not, and what alternative would you suggest? (Pages 52-53, paragraphs 4.4.15-4.4.17)**

We welcome the emphasis on protection and enhancement of all biodiversity, and advocate an ecosystem approach by integrating the sustainable use of resources with social and economic needs. We also expect the LDP policy framework to meet the requirements of SPP as detailed under the 'landscape and natural heritage' section. For example para 139 *"local designations should be clearly identified and protected through the development plan"*. Also other elements such as review of local landscape and nature conservation designations, identification of woodlands of high nature conservation value and new woodland creation, protected species, floodplains and wetlands - as natural flood management features, habitat networks. Protection of geodiversity and soils should also be included in the LDP.

Please note that the protection afforded to Natura sites is distinct from that afforded by the Nature Conservation Act, and the legal protection afforded to wider biodiversity, and so the policy wording needs to reflect this.

Our response to Q17 on green infrastructure is also relevant here. There is a major opportunity to set out a spatial approach to protecting and enhancing biodiversity, for example, an area where biodiversity is most likely to be under threat is within the Perth Core Area. The Perth Core Area together with 'Shaping Perth's Transport Future' proposed City Centre enhancements and Cross Tay link road, could form the

focus of an initiative to plan for significant ecological enhancements on a landscape scale that would provide multiple benefits to Perth and its people. A planned green network here could enable enhancements to habitat networks and green transport networks to be delivered where they add most value, rather than as localised ad-hoc responses to impacts from a particular development.

SNH and our partners have developed techniques to help plan such a network and they have been used most notably by Aberdeen City Council to set out a Green Network in their LDP. We are keen to discuss with the Council how best to take this forward so that this can be included in the Proposed Plan and Action Programme.

Finally, we note Paragraph 1.3.2 of the MIR states that the MIR is supported by a 'MIR Habitats Regulations Appraisal' (HRA). As outlined in our guidance any implications for European sites should have informed the options set out. Please note that the policies and proposals to be included within the proposed plan will need to be subject to HRA and any necessary mitigation built in to the plan. We refer to our new guidance on Habitats Regulations Appraisal of plans <http://www.snh.gov.uk/docs/B698695.pdf> We would be happy to meet with the Council to discuss HRA further.

## **Section 4.5 Climate Change**

**Q19. Does the MIR address the key issue that the LDP will require to address in terms of mitigating climate change? If not, what's missing? (Pages 53-58, paragraphs 4.5.1-4.5.24)**

4.5.15 Key issue 18 (Mitigation) focuses on reducing the need to travel. However, there should also be policy to encourage travel by non car means. Please see further comments under Q20.

4.5.16 The proposal to increase existing forest cover from 15% to 25% in line with Scottish Govt target through the planting of 1000ha per year is welcomed, but the LDP should set out how it will contribute to this. New green networks should be included. The supplementary guidance should mention the hierarchy of priorities which will be applied when determining suitability of land for forestry. The Council should encourage increasing home-grown timber production to enhance local resilience, economic prospects as well as carbon sequestration, and as potential biodiversity and landscape benefits.

Appropriate protection of the existing woodland resource needs to be included in the LDP and there is guidance on this elsewhere e.g. <http://www.snh.gov.uk/docs/C271039.pdf>

4.5.18-21 Renewable energy. Please note that the Scottish Government has increased the renewable electricity target to 80% by 2020 (<http://www.scotland.gov.uk/News/Releases/2010/09/23134359>).

We support the preferred option for supplementary guidance (SPG), including a spatial strategy for wind energy developments over 20MW generating capacity. We suggest that the spatial strategy should also consider developments of less than 20MW, particularly single large turbines and small clusters of large turbines given the potential for significant cumulative landscape and visual impacts from such developments.

The SPG should be informed by a thorough and robust capacity study. We have welcomed the Landscape Study to Inform Planning for Wind Energy that has been undertaken already to inform the SPG.

SNH would be pleased to assist in the development of SPG for wind energy developments.

4.5.23 Carbon rich soils: We welcome the preferred option to develop a policy which protects carbon rich soils. We would be happy to assist in the identification of these.

4.5.25 Flood risk. We seek the preferred option to include identification of areas of managed realignment of the coast and enhancement in the LDP, and development of policies to implement these.

**Q20. Are there any other issues that the LDP will require to address in terms of climate change adaptation? If so, what are they? (Pages 53-59, paragraphs 4.5.1-4.5.4 and 4.5.25-4.5.30)**

Yes: we feel the LDP could do more in terms of facilitating and helping to lead pro-active responses to the challenge of climate change through adaptation and changes in land-use.

- 1) encouragement of travel by non-car means
- 2) integrated land use approach including multi functional green infrastructure.

1) 4.5.15 Key issue 18 (Mitigation) focuses on reducing the need to travel. However, we recommend a policy to encourage travel by non-car means.

Preferred options would be:

- to develop a network of green corridors within and between settlements which allow for non-car use e.g. walking, cycling
- to design 'walkable' environments in new developments.
- ensure cycling provision is built into new transport infrastructure etc.

The LDP should detail how the planned allocations and particularly strategic sites, and proposed new infrastructure such as the Cross Tay Link Road will meet these climate change targets.

2). We are encouraging the development of more integrated land use approach in the LDP. This includes, prioritising areas for planting to meet a range of climate change mitigation and adaptation targets. e.g. flood impact mitigation through sensitive planting in appropriate areas, requiring a strategic planned approach to woodland planting. There are ways in which tree planting in certain parts of the catchment can help to retain water in the upper parts of the catchment, and reduce run-off rates to minimise the severity and intensity of flood impacts further downstream. Other examples include soil erosion control and the role of trees/woodland, and identify, safeguard and positively manage areas at risk of flooding (including sea level rise in coastal areas and lead/implement coastal managed realignment). Green infrastructure is an key part of this integrated approach. Please refer to our comments on Q17.

#### **Section 4.6 Infrastructure Delivery**

**Q21. Do you support the general approach to developer contributions towards infrastructure provision? (Page 63, paragraphs 4.6.15-4.6.17)**

Whatever the process for applying rates of contribution, the Plan should make it clear that contributions may be required for green infrastructure that mitigates for impacts of new development. We consider that funding green infrastructure and enhancements to green networks is a legitimate use for developer contributions, particularly where such enhancements are considered a necessary part of the overall package of measures in the plan to deliver sustainable development.

**Q22. Do you agree that developer contributions will be needed to contribute towards major transport infrastructure in the Perth Area and that those should be applied to the entire Perth area at varying rates. (Page 63, paragraphs 4.6.15-4.6.17)**

We note there is not a specific question in the MIR consultation in relation to the transport and accessibility options (pages 60-63). Please refer to our response to the SPTF consultation and SEA.

### **Chapter 5: Spatial Strategy**

Please note we have provided comments below on site allocations in the Spatial Strategy mainly on European and nationally important designations, but further investigation of wider natural heritage interests is needed e.g. access, recreation, greenspace and wider biodiversity interests.

#### **Section 5.2 Perth Area**



**Q23. Do you agree that the Perth Core Area should be extended to include Methven, Stanley and Balbeggie? If not, why not? (Pages 68-69, paragraphs 5.2.3-5.2.5)**

We recognise the potential benefits of extending the Perth Core Area to include Stanley, Balbeggie and Methven. However, the aim of protecting Perth's setting (and the setting of other settlements) will only be achieved if there is a planned approach to enhancing and strengthening the features of the landscape that are key to the character and setting of these places.

**Q24. Do you agree with the preferred Green Belt boundary shown in Map 1 and the general approach to development within it? (Pages 70-71, paragraphs 5.2.8-5.2.9)**

We are unclear as to how the current Green Belt has been taken into account in relation to the proposed allocations in the MIR. Scottish Planning Policy states that Green Belt designation should take place within the context of a settlement strategy (para 159), which we are supporting for the LDP.

The proposed Green Belt boundaries differ in some respects from those suggested by the "Perth Green Belt Study" (David Tyldesley & Associates) carried out for Perth and Kinross in 2000 which is used (in the context of the draft Perth Area 2004 Local Plan) as the rationale for the current designation.

-West of Perth: the proposed inner boundary is located outwith the ring road. This may not be robust enough to prevent further westward spread of development.

-North of Bertha Park is a sensitive area in terms of both landscape and other natural heritage issues.

Please also refer to our comments below on the Bertha Park area.

-The proposed Green Belt is 'open' along side the A9 between Redgorton and Luncarty. This could result in northward ribbon development.

We recommend that the basis for decision-making is therefore updated to inform the Perth and Kinross LDP and there is a clear rationale for the definition of the detailed boundaries. In particular, to ensure that the objectives of Green Belt designation are reflected e.g. that the Green Belt protects and enhances the quality, character, landscape setting and identity of Perth, safeguards the countryside from encroachment, and protects/provides access to open space around Perth. SNH would be happy to advise on an updated Green Belt study taking into account the development that has occurred in past 10 years.

**Q25. Do you support the hierarchical approach to the identification of sites to meet the additional requirement? If not, why not and what other approach would you suggest? (Page 71, paragraphs 5.2.10-5.2.11)**

We support this hierarchical approach but recommend policy is needed to ascertain what circumstances will justify moving from 'sites within boundaries of Perth' to 'strategic expansion areas adjacent to Perth'.

Re increasing housing density, please refer to our response for question 4. The Proposed Plan should show how housing land requirements are being reduced by applying higher density housing where appropriate.

**Q26. Is the MIR correct to discount the new village proposal at Craigend to the west of Methven as being contrary to the TAYplan strategy because of its location outwith the Core area? If not, why not and what approach would you suggest? (Pages 68-76, paragraphs 5.2.3-5.2.7 and 5.2.1-5.2.18)**

No comment

**Q27. Is it reasonable to assume that the sites within Perth will contribute a total of 700 houses to the overall supply? If not, why not? (Pages 76-80, tables and maps 4 and 5)**

Please refer to our site visit appraisal appended (7 April 2010) for our comments on Tulloch Marshalling Yard.

**Q28. Which of the strategic sites identified within the Perth Core area do you think have potential for housing development and are likely to be developed within a reasonable time period? (Pages 80-81, paragraph 5.2.19, table and map 6)**

We note the 2 major housing land scenarios identified in the MIR. Please also refer to our comments on the SEA Environmental Report regarding the assessment of these options. We are unclear as to how the 2 Options are packaged as there doesn't seem to be rationale for the inclusion of some sites in one option but not the other. There do not seem to be two distinct alternative settlement strategies.

As such, rather than express a preference for Option 1 or 2, we have summarised our assessment of the overall potential landscape and wildlife impacts of major proposals that are included in the options. We recognise that in coming to a view as to which sites to include in the proposed plan, the Council will take into account a range of other impacts and potential benefits for each site.

It is not clear what the blurred edges to some of the proposed allocations indicate. Does this imply future expansion? Please clarify.

Please refer to our detailed site visit appraisal comments appended (7 April 2010) in relation to Perth West, Almond Valley Village, Almondbank and Bertha Park. Our comments should also be read in conjunction with those for the Shaping Perth's Transport Future (SPTF) consultation.

Looking overall at the largest strategic sites for potential housing development, we prefer the Almond Valley site, (Map 6 Site C) to the Perth West site (Map 6 Site D).. Our comments on the planning application for Almond Valley have been made previously (ref our response of May 2008). This site appears to be less sensitive in landscape and visual terms than Perth West, which is recommended as Green Belt by the Perth Green Belt Study and has a weak western boundary.

We note the statement that there is significant doubt that the proposed roads infrastructure in Crieff Road/A9 could support both Almond Valley and Perth West (para 5.2.19). As such, we would welcome further discussion on these major proposals as to how the allocation for housing land can be finalised while limiting natural heritage impacts.

Of all the strategic sites, we consider the Bertha Park site (Map 6 Site A) to be the most sensitive. The allocation as identified in Map 6 will result in significant loss and/or damage to Ancient Woodland Inventory sites and species on the site. This could be a result of building within the woodland or encroachment of housing into its rural setting and the increased disturbance this could lead to. The woodland is also potentially affected by the CTRL as the preferred option dissects it. Please refer to our concerns about potential cumulative impacts in our response to the SPTF consultation and associated SEA. We recommend that any decisions should be informed by a detailed assessment of the value of this woodland prior to allocation in the LDP as stated in our comments of 7 April 2010.

Almondbank is a small brownfield site, but would require an appropriate assessment as it is adjacent to the River Tay SAC.

The rationale for 'Open Space wedges' indicated on map 6 is not clear and we request clarification of this. We would be pleased to discuss this in the context of developing a green network for the Perth Core Area.

**Q29. Which sites identified within or adjacent to the Perth Core villages do you think have potential for housing development? (Pages 82-89, paragraphs 5.2.20-5.2.25, maps 7-12)**

Please refer to our site visit appraisal comments appended (7 April 2010) for our comments. In addition:

Bridge of Earn Site C: David Tyldesley noted that this site is important as setting for the village and for



Grange (Site G): Please refer to site visit comments for Grange/Errol 7 April re potential cumulative effects on River Tay SAC.

Inchture (Site H): This site was once part of Rossie GDL and is now severed from it by A90. The Perth Landscape Capacity Study 2000 stated that the site has no capacity for housing. The role of open space wedge not clear.

Please refer to site visit comments for Grange/Errol 7 April re potential cumulative effects on River Tay SAC.

Longforgan (Sites I and J): The Southern boundary of proposed Site I abuts an Ancient Woodland Inventory site (Long established plantation origin). Retain and protect/buffer.

Neither site has an obvious boundary to prevent further expansion. Site J is possibly less visible.

Q31. Do you agree with the proposed new economic development sites? If not, what alternatives would you suggest? (Pages 94-95, paragraphs 5.2.27-5.2.30, map 20)

Inveralmond North Area A: potential for development

Huntingtower West Area B is within proposed Green Belt in the DTA Perth Green Belt Study.

North Muirton Area C may be potential for development but consider potential impacts on River Tay SAC.

Bertha Park Employment Site D: Please refer to our comments on Bertha Park above (Q 28) and 'SNH comments 7 April 2010' appended.

Marshalling yard Area F: refer to SNH comments site visit 7 April 20012 appended.

Perth Airport: this could constitute ribbon development along the A94

### Section 5.3 Highland Perthshire

Q32. Do you agree with the preferred option to allocate 70% of the additional housing allocation to Aberfeldy and Pitlochry and the remaining 30% to the landward area? If not why not, and what alternatives would you suggest? (Pages 98-99, paragraphs 5.3.3-5.3.6)

No comment

Q33. Which of the sites identified in Aberfeldy and Pitlochry do you think have potential for housing development? What alternatives would you suggest? (Pages 100-102, paragraphs 5.3.7-5.3.8, maps 22-23)

Please refer to detailed SNH comments/site visits appended 3/29 June 2010.  
Additional comments are:

Pitlochry Site A: some capacity as long as contained within Pitlochry 'bowl'

Sites B & C are adjacent to Ancient Woodland (semi-natural origin), so consider protection and enhancement measures, such as a buffer strip and access management.

Aberfeldy East /Borelick Site D: This would remove existing separation between Aberfeldy and Borelick. However, it is on lower land so likely to be less widely visible.

Q34. Which of the sites identified in the landward are of Highland Perthshire have potential for housing development? What alternatives would you suggest? (Pages 103-111, paragraph 5.3.9, maps 24-30)

Ballinluig: Site A includes Ancient Woodland (of semi-natural origin) which could be lost and/or damaged by development.

Birnam site B has presented issues in the past regarding impacts on the River Tay Dunkeld NSA ie. loss of greenspace and impact on integrity of river corridor. Sensitive site valued for peaceful river-side walks. Some housing may be possible but difficult to contain.

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Croftinloan: Ancient Woodland Inventory site adjacent. Introduce native woodland planting to improve connectivity.

Fearnan: F Assess potential impacts on River Tay SAC.

Kenmore: Assess potential impacts on River Tay SAC.

Kinloch Rannoch: Assess potential impacts on River Tay SAC.

Site appears to be within village envelope so some housing possible. The role of the open space wedge is not clear.

Murthly: Site J: Quite contained site but J is also adjacent to Ancient Woodland (of semi-natural origin) and so protection/buffer areas should be considered  
Site I and K have no obvious boundary to prevent further development.

#### **Section 5.4 Kinross-shire Area**

**Q35. Do you agree with the preferred option to allocate 75% of the additional housing allocations to Kinross and Milnathort and the remaining 25% to the larger villages in the landward area but outwith the Loch Leven Catchment area? If not, why not and what alternatives would you suggest? (Pages 113-114, paragraphs 5.4.1-5.4.5)**

The Kinross wastewater treatment works is already beyond hydrological capacity. Any additional connections to this will require an upgrade in these facilities to prevent nutrient loading of Loch Leven at times of high rainfall.

**Q36. Which of the sites identified in Kinross and Milnathort have potential for housing? What alternatives would you suggest? (Pages 114-117, paragraphs 5.4.6-5.4.9, map 31)**

Please refer to SNH comments site visits 3/29 June 2010. In addition:

Site A: probably some capacity in landscape and visual terms. Close to existing settlement core and just about within settlement envelope. Route of Hatton Burn creates eastern boundary.

Site B is separated from Site A by Hatton Burn / open wedge. No eastern boundary to contain further development.

Site C currently provides separation between Milnathort and Burleigh.

Site D: some housing here could smooth off the apparent existing straight line of housing at the northern edge of Kinross. There is a need to ensure that further expansion is contained.

**Q37. Do you agree with the preferred option for the allocation in the landward area to be distributed between sites in 3 or 4 settlements, rather than concentrating it on one larger site? If not, why not? (Page 117, paragraphs 5.4.10)**

Blairingone: Sites A and B both extend the village along the road. Both are bounded by woodland which would help to contain further expansion. Housing on both sites would more than double the size of this settlement.

Powmill (map 33): Site B – see appended comments site visit 3/29 June 2010. The disused hotel site has potential for development.

Scotlandwell site D: The site does not have a clear boundary which would contain further development.

Wester Balgedie Site E: The site does not appear to link well with any existing housing with no clear boundaries for containment.

**Q38. Which option on the landward area of Kinross-shire do you prefer? Which sites have potential for housing? What alternatives would you suggest? (Pages 117-122, paragraphs 5.4.11-5.4.13, maps 32-37)**

Wester Balgedie is in the Loch Leven catchment area. It therefore seems to contradict Q35 where development should be outwith the catchment area if the settlement is not connected to the Leven Valley sewer at Kinnesswood taking the drainage outwith the catchment.

Crook of Devon: Site A: This is considerable growth for a small settlement and we recommend more detailed landscape and visual analysis.

Powmill (from Map 37): Site B See appended comments site visit 3/29 June 2010. As commented above for Site A in Crook of Devon; this is considerable growth for a settlement of this size. This is a far larger site than in map 37 and extending well beyond the hotel site. The site has no boundaries to contain future development

**Q39. Do you agree with the proposed approach to housing development in the Loch Leven Catchment area? (Page 122, paragraphs 5.4.14-5.4.15)**

No, as the effects of new development on Loch Leven may be able to be mitigated. However, these lochs are sensitive to deterioration in water quality. The HRA of the Plan will need to demonstrate that the allocations within the Loch Leven catchment will not have a significant effect on the integrity of Loch Leven SPA / Ramsar site. We suggest that in order to address this either

- 1) Those allocations be removed from the Plan; or
- 2) The following additional safeguard is included in the plan, or in Supplementary Guidance adopted at the same time as the Plan:

Proposals in relation to allocations in these settlements need to demonstrate (by means of new treatment infrastructure or other means) that they will deliver no net increase in existing phosphorus discharge into the Loch Leven catchment.

As you are aware we are preparing guidance for developers on Loch Leven planning applications, in partnership with the Council and SEPA. We encourage this, along with the River Tay Code of Practice, to be included as Supplementary Planning Guidance in the LDP. This will explain what information potential developers are required to submit with a planning application in the Leven Catchment to ensure there is no increase in phosphorus discharge to the loch.

**Q40. Do you agree with the proposal to meet the employment land requirement by identifying land at Turfhill and South Kinross? (Pages 122-123, paragraphs 5.4.16-5.4.17, map 38)**

South Kinross sites:

Site B would further spread development to the west of the M90 and expand the development hub at Junction 6. This should be resisted.

Site (C) has the potential to detract from one of the more iconic views of Loch Leven and the castle from the M90.

## **Section 5.5 Strathearn Area**

**Q41. Do you agree with the preferred option to allocate 80% of the additional housing allocation to Crieff and the remaining 20% to the landward area? If not, why not, and what alternatives would you suggest? (Pages 125-126, paragraphs 5.5.5-5.5.9)**

No comment.

**Q42. Which of the sites identified in Crieff have potential for housing development? What alternatives would you suggest? (Pages 126-129, paragraphs 5.5.10-5.5.13, map 39)**

Please see appended comments site visit 3/29 June 2010. In addition:

Crieff Site A adjacent to Ancient Woodland (Long-established Plantation) and so protection measures should be considered e.g. buffer zone, access management. Some capacity on lower land but no boundary to contain further development.

Site D: Extensive housing at this site would change the character of Crieff and take the settlement out of its natural 'bowl'. There are no boundaries to contain the development.

We recommend that a capacity study is carried out for Crieff.

**Q43. Which of the sites identified in the landward are of Strathearn have potential for housing development? What alternatives would you suggest? (Pages 129-131, paragraph 5.5.14, maps 40-43)**

Aberruthven: Site A: Some capacity for housing but this proposal would change the character of this linear village.

Blackford Site B: Some capacity but would need to be compensation for the loss of the existing 'recreation ground'.

Comrie Site C: adjacent to Ancient Woodland (Long-established Plantation) and so protection measures should be considered e.g. protect/buffer zone. Some capacity for housing. The site appears to have strong boundaries.

Gleneagles Site D: some capacity. Site contained.

**Q44. Do you support the re-allocation of the existing employment land within the Auchterarder Framework to a larger site of 6ha (shown on Map 44 as site B)? If not, why not? (Pages 131-132, paragraph 5.5.17, map 44)**

This is probably a better site in landscape and visual terms.

**Q45. Do you agree that the site options identified for employment land within Crieff have potential? If not, why no, and what other sites would you suggest? (Pages 132-133, paragraphs 5.5.18, map 45)**

Please also refer to our comments on sites in Q42 above.

Sites A, B and C abut main road and are broadly within the existing settlement envelope.

Sites D & E: Both sites are separate from the town and would create an edge-of-town employment park

#### **Section 5.6 Strathmore and the Glens Area**

**Q46. Do you agree with the preferred option to allocate 90% of the additional housing allocation to Blairgowrie/Ratray, Alyth and Coupar Angus and the remaining 10% to the landward are? If not, why not, and what alternative would you suggest? (Pages 136-137, paragraphs 5.6.5-5.6.8)**

No comment.

**Q47. Which sites identified in Blairgowrie/Ratray have potential for housing development? What alternatives would you suggest? (Pages 137-139, paragraphs 5.6.9-5.6.11, map 46)**

We recommend a landscape capacity assessment for this area. Please refer to our comments re site visit 3/29 June 2010. In addition;

Site A: This would extend town up the slope and beyond the existing settlement envelope therefore limited capacity.

Site B: Some capacity on lower slopes only.

Site C: see previous comments. The Ardblair and Myreside Fens SSSI is to the west. Avoid drainage westwards into the SSSI where there is already a eutrophication issue from diffuse pollution. This site would also extend the settlement westwards.

Southern third: some capacity for development, well bounded to west. Site C is adjacent to Ancient Woodland (Long-established Plantation) and so protection/buffer/enhancement measures are required.

Middle third: existing line of trees probably not strong enough to contain further development

Northern third: some capacity close to the road but not on the more visible, elevated land behind.

Site E: is adjacent to Ancient Woodland (Long-established Plantation) and so protection/enhancement/buffer measures needed.

Site F – refer to previous comments. Sites F and G have capacity for housing but sites are some distance from town centre which makes them less sustainable. Recommend need to develop new walking routes avoiding main roads.

**Q48. Which of the sites identified in Alyth have potential for housing development? What alternatives would you suggest? (Pages 140-141, paragraphs 5.6.12-5.6.14, map 47)**

Alyth Site A: Not a good site from an L&V perspective. It is outwith settlement envelope and on more visible, elevated slopes. The Den of Alyth SSSI and Ancient Woodland Inventory site lies to the south.

Site B; Capacity (within envelope) but clear boundary would need to be established.

Site C: Some capacity but no strong boundary

**Q49. Do you agree that the site identified in Coupar Angus has potential for housing development? If not, why not, and what alternatives would you suggest? (Page 142, paragraphs 5.6.15, map 48)**

Coupar Angus: Site A: This site seems to be separated from the town and outwith the existing settlement envelope. This is effectively a new settlement. Assess potential impacts on River Tay SAC.

Alternatives; Recommend consideration of existing town centre brownfield sites should be explored further. There are a number of buildings in Coupar Angus which could be renovated to provide new housing. This could have a major positive impact on the character of the settlement.

**Q50. Which of the sites identified in the landward are if Strathmore have potential for housing development? What alternatives would you suggest? (Pages 143-146, paragraph 5.6.16, maps 49-53)**

Ardler Site A: Development on this site would mirror that on the other side of the road. There is some limited capacity for further housing development. However, the site has no boundary to the north west therefore nothing to contain further expansion



Carsie: Small site between road and the eastern end of the White Loch. Some capacity.

Meikle Site A: Capacity for housing in the main part of the site. Boundary should be made where the site narrows.

Site B: Some capacity for housing. Building should be constrained within the western part of this site. However there is no obvious boundary to constrain further development.

New Alyth: Part of the site has some capacity for new housing. Any new development should be in keeping with the existing rectilinear street pattern and should not extend beyond Banff View.

Spittalfield Site A: this site contains and is adjacent to Ancient Woodland (Long-established Plantation). Retain and protect areas within and adjacent to site, buffer and enhancement measures needed. Some capacity for housing outwith these areas.

**Q51. Do you agree with the proposed approach to housing development in Lunan Valley Catchment? (Page 146, paragraphs 5.6.17-5.6.19)**

These lochs are sensitive to deterioration in water quality. The effects of new development may be able to be mitigated. Development proposals will need to demonstrate that they will deliver no net increase in existing phosphorus discharge into the Lunan Valley Catchment.

The HRA of the Plan will need to demonstrate that the allocations within the Lunan Valley catchment will not have a significant effect on the integrity of the Dunkeld-Blairgowrie lochs SAC.

We suggest that in order to address this either

- 1) Those allocations be removed from the Plan; or
- 2) The following additional safeguard is included in the plan, or in Supplementary Guidance adopted at the same time as the Plan:

Proposals in relation to allocations in these settlements need to demonstrate (by means of new treatment infrastructure or other means) that they will deliver no net increase in existing phosphorus discharge into the Lunan lochs catchment.

**Q52. Do you agree with the proposal to direct 75% of the requirement for additional employment land within the Strathmore and the Glens are to Blairgowrie? If not, why not? (Pages 146-147, paragraphs 5.6.20-5.6.23)**

No comment.

**Q53. Do you agree that the site options identified in Blairgowrie and Coupar Angus for employment land have potential to meet additional requirement? If not what alternatives would you suggest? (Pages 146-147, map 46 and 48)**

Please refer to our comments under Q47 and Q49.

#### **Policy framework**

The SPP sets out clear policy requirements for the landscape and natural heritage which we would expect the LDP to incorporate either in the LDP or Supplementary Guidance. Some additional comments at this stage include the following but we will be able to comment in more detail when there the detail of the guidance and policy framework in the Plan known. Please also cross reference to our comments on the MIR above in relation to the specific policy topics.

Page 152: we welcome new policies on climate change and mixed use areas.

Page 153: Housing in the Countryside – we welcome the intent to tighten specific areas for environmental reasons – please see our comments under Q6.

Page 157; Forestry Para 146 of SPP states that woodland of high nature conservation value should be identified in development plans along with relevant policies for its protection and enhancement. We would expect this to include Ancient Woodland Inventory sites in PKC. Please refer our additional comments under Q19.

Page 159: there is no reference to other designated sites – include. We are not clear what will be dealt with under protected species and habitats.

Include River Tay SAC Code of practice for developers in SPG under International nature conservation sites. We are also drafting the Loch Leven Code of practice and seek its inclusion as Supplementary guidance.

Page 160/161: as per SPP para 139, we seek the identification and protection of local designations through the LDP.

Page 161 welcome green corridors policy. The key corridors should be shown on the main Plan map. Reflect the role of green corridors providing off road access where appropriate e.g. between settlements. Link to cycling and public access policy?

Link with recreational and open space policy and placemaking, and mixed use areas.

Consider also a policy for housing density – will this be included in Placemaking policy?

**The deadline for submitting comments on any aspect of the Main Issues Report including the above questions is 11 February 2011.**