

APPENDIX 1

Summary of comments received on the supplementary guidance

Comments on Placemaking draft supplementary guidance

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
General comments			
Concern over when the SG will come into force and over impact on viability of development as a result of the new requirements. Also, would like to see clarity on what is essential, desirable etc. Concerned that it requires far more connections with other documents that it relates to.	Scone Estates/Errol Estates	The Placemaking SG is guidance that has been prepared to provide further detail on Policy 1: Placemaking in the now adopted LDP2. In terms of the requirements, this guide simply provides further information on how Policy 1 will be implemented. As LDP2 has now been adopted, the policy should from now on be adhered to through any subsequent planning applications. Hyperlinks are being provided to the other SGs it relates to.	Hyperlinks to other documents created.
It is good to see the important role of placemaking in the planning process.	NHS	Noted.	None.
The approach towards considering site suitability in terms of sustainable transport options at the outset is supported. Measures to support the use of green travel options (walking/cycling) to access the rail network should be included as a means to encourage and achieve sustainable development.	Network Rail	Reference to creating active travel nodes linked with public transport has been added.	Active travel nodes added to section on Public Transport.
Recommendation that this guidance should focus on where significant and strategic placemaking opportunities lie, and associated settlement characteristics in Perth and Kinross.	SNH	This guidance is not a strategic document – it is to provide further detail to Policy 1 in LDP2. Consequentially, it is not the appropriate document in which to provide locational opportunities. However, there is potential for this to be incorporated into the next LDP as a strategy.	None.
No reference or links to Community Design Charrette or Right to Buy.	Portmoak Community Council	Updates have been made to the consultation section and linkages provided for best	Hyperlinks to Council's consultation advice section on website.

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		practice. The Right to Buy issue is appropriate for the Placemaking Guide.	
1. Introduction			
It is argued that the introduction of this document is quite confusing and is unclear what the aim is and whether any process needs to be followed. Although Page 40 provides detail of the aim of the technical notes, it is considered appropriate to have a well-defined aim at the start of the document, making the use of the document clearer to the user.	Stewart Milne Homes	The technical notes have now been incorporated into the document to provide more clarity as to their usage.	Technical notes incorporated into the Guide.
Good placemaking applies to all development but the guidance should specify the information developers can expect to provide for applications from a single house through to a large scale strategic masterplan. Consider an application evaluation checklist that could be applied at development management.	SNH	A checklist was provided for each section but has now been developed to provide the requirements for three types of application: major, local & householder.	A checklist at the end of each Design Principle has now been provided for specific types of application.
2. Placemaking process			
Concern that it is not clear what preparation is required for development depending on the scale and that the requirements are generally more appropriate for a masterplan than a smaller development.	Stewart Milne Homes & Pilkington Trust	A checklist at the end of each Design Principle has now been provided for specific types of application.	A checklist at the end of each Design Principle has now been provided for specific types of application.
Suggests that that decisions and agreements reached at the Pre-Application stage must be binding on all parties in order to avoid a later scenario whereby applicants are requested to make	Strutt & Parker	This is not an issue that can be resolved through the Guide but the comments have been passed on to Development Management	None.

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design amendments during the formal application determination process thereby extending the determination period and introducing additional cost and uncertainty for applicants and hampering the deliverability of sites. Similarly, the pre-application stage is intended to allow the applicant to clarify the surveys, reports and other information that the applicant will require to submit with the application to enable the Council to determine the application within the target timeframes.		for further consideration in their pre-app process.	
Suggestion that the Technical Notes should be deleted as they are creating an extra layer of complexity. Considers that the document does not reflect the current planning bill which is seeking to remove supplementary guidance due to the complexity it adds to the system. Views them as an unreasonable amount of complexity which will be particularly onerous for smaller developers to navigate through.	Homes for Scotland	The Technical Notes have now been incorporated into the Guide itself and some of the content deleted or relocated to prevent duplication.	Technical notes incorporated into the Guide.
The requirement on page 9 to <i>“Always provide evidence of how you feel the consultation went by sending your report to the Community Council prior to submitting it to the Council”</i> is unnecessary. The report will be provided as part of the application and as such subject to a statutory consultation period. The Community Council will therefore have the opportunity to comment on it and the other application documents at that stage. This	Homes for Scotland, Scone Estate, Errol Estate & Pilkington Trust	The requirement to provide evidence of how the consultation went and send to Community Council is simply good practice and courteous. If the report is transparent and reflects how the process was undertaken, there should be no issue in allowing the community to view it.	None.

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requirement should be removed as it is clearly unnecessary.			
<ul style="list-style-type: none"> • Guide requires a sense of proportionality in terms of engagement. Levels of community consultation activity could be increased as the scale and impact increase as per the current statutory requirements. • Supportive of the requirement for “<i>local needs and community aspirations</i>” but raises concerns over resistance to change may not always reflect a balanced view from communities. • Requires clarity at which scales of development an applicant should “<i>identify local needs and respond to community aspirations</i>”. Concerned that approach might make applicants discuss issues that they cannot deliver on or which are out with their control. • Reference to Environmental Impact Assessment should be given more specific attention in the guide as a separate, albeit interlinked, process 	Scone Estate & Errol Estate	Many of the issues raised are valid concerns. The Placemaking Guide is providing examples of good practice, it is for the applicant to judge what level of consultation is required and how they respond to the feedback. There are times when the feedback is not proportionate. However, through a transparent recording of the process, these issues can be highlighted and passed on to the appropriate stakeholders. It is not possible for guidance to provide that judgement as each circumstance/context will be different.	Reference to EIA removed and linkages made to guidance on consultation.
What is placemaking? Add the key message that the outcome of placemaking should be sustainable, well-designed places and homes which meet people’s needs by harnessing the distinct characteristics and strengths of each place to improve the overall quality of life for people.	SNH	Agree that this key message should be added.	First sentence of the section amended to incorporate message.

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<p>Examples of SWOT analysis table: Revise this analysis and its role relating to placemaking. Mature trees in shown in the weaknesses column but these are key assets for placemaking and should be in the opportunities column. Likewise, bat roosts are not a weakness and should be moved under threats – loss of habitat. The example of ‘Community opposition in terms of access and loss of woodland’ being considered under threats is also confusing. Examples for weaknesses in this analysis could be sources of negative impacts on the amenity or accessibility of a place such as a busy road, or a neighbouring sewage treatment works.</p>	SNH	Agree with the suggestion to change the examples in SWOT analysis .	<p>SWOT analysis Weaknesses examples updated to the following:</p> <ul style="list-style-type: none"> • Adjacent to industrial unit. • Impact on local amenity space.
<p>Draft Site appraisal: Parts of this section confuse placemaking with other essential planning considerations such as capacity of schools, surgeries, power/heat supply or contamination of the site. We suggest these are separated/omitted so as to not distract from the key aims of this guidance. Add the following:</p> <ul style="list-style-type: none"> • Alter the first bullet about boundary features; “consider existing interfaces of a site - this helps determine the type of edge treatment that is needed, e.g. permeable, screened or visually open.” 	SNH	Agree with the suggestion to make the Draft Site Appraisal section clearer.	<p>Draft Site Appraisal updated to reflect these suggestions.</p>

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<ul style="list-style-type: none"> • Add “Natural features and habitats (e.g. trees or woodland and type, species diverse grassland or type of coastal habitat)” • Add “Consider landscape character and landscape setting such as skylines and landmarks.” • After water courses bullet under site features: add “...associated wetland habitats within and adjacent and site hydrology - natural drainage pattern and water features of the site.” • Linkages – add pedestrian access points or gateways to key destinations, desire lines 			
Example of site analysis diagram: Red box: While we welcome the intent to raise awareness of a Special Area of Conservation (SAC) in the site analysis diagram, we do not think this adds value in identifying key issues for the SAC, or in terms of the concept of placemaking. Suggest this is replaced by ‘watercourse.’	SNH	Agree with this suggestion.	Changed SAC to watercourse in example description.
Engaging with the local community (pg 7) Identify and engage with key stakeholders: we welcome the emphasis on early engagement. We recommend setting out how and when to consult SNH if required, with reference to SNH’s website so developers can be clear on our approach:	SNH	Agree to highlight that further guidance should be sought from the key stakeholders on how to consult them.	Statement added: “Please check with the respective bodies for further information on how to consult them.”

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https://www.nature.scot/professional-advice/planning-and-development/consulting-snh-planning-and-development			
3. Placemaking Principles			
<p>1. There are no references to wild land/Wild Land Areas as identified by Scottish Natural Heritage. Suggest there is a case for reference in the “Placemaking” Supplementary Guidance to Wild Land Areas, given their significance to the Perth & Kinross local authority area - as is recognised in the “Landscape” Supplementary Guidance, Perth & Kinross contributes significantly to the overall extent of wild land in Scotland; of the 42 wild land areas identified in SNH’s map of Wild Land Areas (2014) six are wholly or in part within the local authority’s boundary.</p> <p>2. Proposed Policy 1B includes a welcome and essential requirement on developers to <i>“consider and respect site topography and any surrounding important landmarks, views or skylines, as well as the wider landscape character of the area.”</i> Recommends this</p>	John Muir Trust	<p>1. Agree that Wild Land Areas should be noted</p> <p>2. In terms of changes to the policy wording, this is guidance for the policy and cannot change the policy wording. This is undertaken through the LDP consultation process. No change proposed.</p> <p>3. Reference should be made to woodlands regarding flood risk.</p>	<p>1. Additional bullet point added to National and Local Designations on page 33.</p> <p>2. No change to the Guide.</p> <p>3. A sentence has been added to Shelter belts: “Healthy woodlands can also play a part in managing flood risk.” (page 23)</p>

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<p>section includes a specific reference to the desirability of protecting wildness qualities.</p> <p>3. Recommend a brief reference to the contribution healthy woodlands can play in managing flood risk.</p>			
<p>1. Suggests it is unclear how the document fits with Scottish Planning Policy guidance on Placemaking and the Government's Policy Statement "Creating Spaces". SPP highlights that although the design led approach should be applied at all levels, the site level is within masterplans. This backs up the argument that this level of information is excessive for smaller sites. There is also no reference to the six qualities of successful place which is a theme of both documents and should also be considered to be appropriate for the Council's Placemaking Guide.</p> <p>2. Suggests that the Guide is not clear when or how any information is to be submitted. Although this document provides a clear understanding of what the Council will look for in the design of a site, it is confusing and adds to the volume of information to be addressed and therefore the cost to an</p>	Stewart Milne Homes	<p>1. It is agreed that the Guide could better follow the Scottish Government's 6 principles.</p> <p>2. The Guide is intended to provide additional advice on the placemaking process and not intended to be proscriptive.</p>	<p>Guide has been restructured to reflect the 6 qualities of a successful place:</p> <ol style="list-style-type: none"> 1. Distinctive 2. Safe & Pleasant 3. Easy to move around and beyond 4. Welcoming 5. Adaptable 6. Resource efficient

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applicant when submitting an application. This guide is considered more appropriate as a Masterplan guide for large or sensitive sites and not to be applied to all proposals.			
<ol style="list-style-type: none"> 1. Proportion, page 26, one sentence needs adjusting; it begins "Intrusion into -----". It doesn't read very well. 2. On page 29, under Streetscape, there's a mention of "repair of windows", under the term Historic Streets". Suggests referring to guttering & down pipes as well. 3. Suggests awards for the upkeep of buildings, (including the private sector), covering all aspects of the way buildings look. If the visual effect is poor then there's an effect on the way people see their City or community, residents & tourists alike. 	A member of the public	<ol style="list-style-type: none"> 1. Wording changed to clarify meaning. 2. Repair of guttering is generally out of the control of planning although it is agreed that it can sometimes have a visual impact on a street. 3. Further work is required before Awards are established but they will generally be for new development rather than existing buildings. 	<ol style="list-style-type: none"> 1. Changed to: "Intrusive views..." 2. No change to the Guide. 3. No change to the Guide.
<ol style="list-style-type: none"> 1. Draft Site Appraisal (page 5): While access and multi modal transport are noted for consideration, this section should reflect that larger sites will require a Transport Appraisal or Statement to be produced that will also cover these subjects. 2. Accessibility and Permeability (page 35-38) Transport Assessment: This section doesn't adequately explain the Transport Assessment process and should reflect other guidance issued. It should also reflect Designing Streets policy. In the context of 	Tactran	<ol style="list-style-type: none"> 1. Agree to add further clarification to this process. 2. The Guide was written with reference to the Designing Streets policy and generally reflects the guidance provided. The Transport Assessment section has been removed and the Designing Streets hierarchy diagram inserted. 3. The Guidance was written with the Designing Street policy document. 4. The Guidance was written with reference to Sustrans. 	<ol style="list-style-type: none"> 1. Statement added "larger sites will require a Transport Appraisal or Statement)" 2. Transport Assessment information removed and Street Hierarchy from Designing Streets added.

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<p>placemaking, it may be useful to include this as part of a Quality Audit type process.</p> <p>3. Streets: The section on street design should better reflect the Designing Streets policy document while taking cognisance of the current debate around the appropriate use of shared space designs.</p> <p>4. Cycle Routes and Cycle Friendly Infrastructure: This should reflect national guidance and best practice as published by Sustrans and Cycling Scotland. The Council's Active Travel Strategy should also be referenced.</p>			<p>3. A link has been provided to the "Designing Streets" website.</p> <p>4. A link has been provided to the Sustrans website.</p>

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<p>1. Applying the Policy</p> <p>1.1 Within Section 3 we recommend the inclusion of the whole placemaking policy wording from the proposed local development for clarity of readers.</p> <p>2. Energy Efficiency</p> <p>2.1 We support the requirements of the SG that development should minimise energy demands and take account of microclimate as this accords with climate change mitigation and adaptation. For clarity however we do recommend that the text makes it clear that there are a variety of renewable technologies that may be applicable and the options are not limited to the options referred to in the text.</p> <p>3. Green/ Blue Network Connections</p> <p>3.1 We support the inclusion of the reference to green and blue network connections in the guidance as we recognise this is a key element of placemaking. Due to this fact however we suggest that your authority consider compiling the placemaking and green infrastructure SG into one guidance document.</p>	SEPA	<p>1. Drafting error should be updated.</p> <p>2. The Guide has been updated to provide a more extensive energy efficient section that incorporates the Sustainability Technical Notes.</p> <p>3. The documents have been referenced in the LDP2 as sperate and therefore it is not possible at this stage to change this approach but could be considered for the next LDP.</p> <p>4. Noted.</p> <p>(5.1) Agreed that reference should be made to improving water quality.</p> <p>(5.2) Agreed that reference should be made to FRA.</p> <p>(5.3) Noted.</p> <p>6. Noted.</p> <p>7. Drafting error missed Air pollution from the checklist.</p>	<p>1. Updated to encompass whole policy.</p> <p>2. Whole section updated to encompass Sustainability Technical Notes.</p> <p>3. No change.</p> <p>4. No change.</p> <p>5. (5.1) Updated sentence input on page 31 of the Guide: "The opportunity to restore the water environment should also be considered, where appropriate, through the development process."</p> <p>(5.2) Sentence added on page 25 "Any design should take account of any Flood Risk Appraisal findings.</p> <p>(5.3) No change.</p> <p>6. No change.</p> <p>7. Updated to list Air Pollution.</p>

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<p>4. Designing Out Air Pollution</p> <p>4.1 We support the identification of good air quality as an element of placemaking that contributes to health and well-being, and the requirements on proposed developments with regards air quality. The inclusion and coverage of this issue within the SG accords with the Scottish Government Strategy, Cleaner Air for Scotland (CAFS).</p> <p>5. Drainage and SUDS</p> <p>5.1 We support the commitment that development conserves existing waterbodies. We recommend however that the wording is expanded to highlight that opportunities to restore the water environment should also be considered, where appropriate, through the development process. The expansion of this point is in keeping with your authority's duties under Water Environment and Water Services Act (Scotland) 2003.</p>			

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<p>5.2 We support the fact that the SG states that flood risk should be investigated early, although we recommend that the wording could be expanded to clarify that subsequently development design would have to take account of the findings of any FRA, where appropriate.</p> <p>5.3 We support the coverage of SUDS, including the fact that measures should be integrated into blue green corridors, and can be an asset to the site with regards placemaking.</p> <p>6. Recycling Facilities</p> <p>6.1 We support the statement that waste should be minimised and the inclusion of text to highlight that recycling storage facilities on site need to be included within the design.</p> <p>7. Environmental Checklist</p> <p>7.1 We advise that “designing out air pollution” has been missed out of the environmental checklist on page 19 and we recommend for consistency that this is included.</p>			
<ul style="list-style-type: none"> Page 5 –Welcome the mention of watercourses, waterbodies and associated 	Structures & Flooding Team PKC	Updated to reflect suggestions.	<ul style="list-style-type: none"> Storm water change to flood

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<p>habitats and flooding/drainage issues for Draft Site Appraisal. This will ensure any problems are identified upfront in the planning application process.</p> <ul style="list-style-type: none"> Page 15 –Welcome the mention of blue/green network connections. The phrase “storm water management” could be better described as “flood management”. This section could also mention the requirement to make space for SUDS (which is a legal requirement) at the earliest stages in the placemaking process and to integrate this with the surrounding development. A link to the Council’s supplementary guidance on Flooding and Drainage could also be added here. Page 18 – Drainage and SUDS Requirements - please amend as follows: “...and highlight whether there is a need for a flood risk assessment and/or a drainage impact assessment.” Page 18 - Drainage and SUDS Requirements - Welcome the mention of our “Flooding Supplementary Guidance” but it isn’t hyperlinked like the other guidance documents. We would suggest a hyperlink be included. 			<p>management on page 231.</p> <ul style="list-style-type: none"> Drainage impact assessment added on page 25. Hyperlinks created to other supplementary guidance.
Suggests clarity over the wording on new public space (p27) evidently sunny and sheltered open spaces are desirable, but they will not always be	Pilkington Trust	The site should be designed according to the features and landform. Therefore, it is clear that this is the approach that the Council	No change.

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possible due to the nature of the respective site. This should be reflected within the Draft SG wording.		encourages developers to undertake when designing the site.	
Environmental considerations Landscape impact: Red box: National and local designations - we recommend removal of the final sentence on protected habitats and species as these are not relevant to landscape and need a separate section. Add wild land interests. Alternatively, remove reference to designations in the guidance and cross reference to the LDP for natural heritage designations. Landscape is a key consideration in place-making. The majority of placemaking opportunities that will arise in Perth and Kinross will be centred within/around settlements. We suggest emphasising the importance of landscape character which is based on the idea that all landscapes are important to the quality of place, not just designated or highly scenic landscapes. It would be helpful to note that landscape character and views can be adversely affected by factors such as intrusive road design, inappropriately proportioned development, non-site responsive layout or grading of existing topography. Given the nature of the significant expansion areas proposed, we recommend expanding on the landscape considerations linked to large scale residential development in small and medium scale rural landscapes, addressing issues such as: <ul style="list-style-type: none"> integration of residential development with the rural landscape character and pattern 	SNH	Habitats and protected species have been removed and wild lands have been added. Many of the issues regarding landscape raised are covered under the sections on views and local character.	Removed reference to biodiversity and added reference to wild lands.

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<ul style="list-style-type: none"> • preservation of rural character – views of settlement and change in landscape fabric • landscape setting, backdrop, horizons and landmark views out of the settlement • impacts of major road infrastructure and associated developments on rural landscape character and means of mitigation 			
<p>Orientation of development: Suggest adding that orientation also contributes to energy conservation. “Any development must consider...” add “how existing development relates to the landform/topography and which elements of the landscape form important parts of a settlements setting (horizon, landscape backdrop, landmarks, ridgelines).”</p> <p>Slopes: Add “Extensive alteration of the topography can also result in damage and loss of existing trees and other existing features of value and character.”</p> <p>Green infrastructure sections (pgs 15-) these are welcomed. We recommend adding guidance/links on how planning obligations towards green infrastructure will be assessed, and likewise demonstrating how places can also provide biodiversity benefits e.g. integrating swift bricks when building new developments.</p> <p>The generic guidance on greenspace, green/blue network connections, shelter belts and habitat connections provides a good introduction but would benefit from more practical guidance and tools/links</p>	SNH	<ul style="list-style-type: none"> • Passive design is covered in the Resource Efficient section in some detail. • Agree to add additional wording to orientation, slopes, greenspace and green & blue networks. Green Infrastructure is covered in detail in another SG. • Tree survey section partially updated to reflect comments. • Habitat connections suggestions agreed to. • Site features section removed and incorporated into other section of the Guide. • Planting and landscaping requirements wording proposals agreed and added. • Edge of settlement suggestions agreed to and added. • Designing out air pollution suggestions added in additional bullet point. 	<p>Additional wording suggestions added to orientation, slopes, greenspace and green/blue networks. Hyperlink made to Green Infrastructure SG. Tree survey wording updated to professionally accredited tree survey. Habitat connections section updated accordingly. Site features section removed. Planting and landscaping requirements wording proposals added to section. Edge of settlement suggestions added. Additional bullet point added to Air Pollution. Additional advice added to the SuDS section. Regional and Local Infrastructure</p>

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<p>First sentence: Add 'waterbodies, trees and hedges and other habitats with biodiversity interest..'. 3rd sentence replace "exploited" with 'viewed as assets for the development'</p> <p>Existing vegetation such as trees, woodland, hedgerows and shelterbelts are similarly valuable assets for placemaking. We suggest the guidance emphasises this and explains the ways they can be integrated successfully into the design and layout. For example, how these can be used to form the edge of a settlement or buffer zones needed between an existing woodland and private gardens or walkways. Add: "Design should allow for adequate buffer-zones and well-designed interfaces so not to encroach on natural existing features such as woodlands, watercourses and edge habitat. These edge habitats can also provide opportunities for multi-functionality e.g. access and footpaths."</p> <p>Planting and landscaping requirements Recommend adding the following to emphasise the significant contribution these can make to good quality placemaking: "Planting and trees are important contributors to placemaking. Street trees are an easy and cost effective way to enhance an</p>			

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<p>Relevant section/paragraph of Guidance</p> <ul style="list-style-type: none"> • “Be considered from the outset of the design/masterplanning stage • Be conceived as an integral part and an attractive contribution of a developments greenspaces and blue-green infrastructure • Be designed to be multi-functional by a multi-disciplinary team composed of appropriate professionals (landscape architect or similar) • Achieve multiple benefits including amenity and biodiversity” <p>Red box: suggest adding “early consideration should demonstrate how SUDS and natural drainage patterns are integrated with the layout so that they can provide multiple benefits such as amenity, landscape, natural heritage, and green corridors. Ecological solutions to SUDs (such as wetlands and ponds) are encouraged as they add biodiversity and landscape value and can contribute positively to green infrastructure.”</p> <p>Regional and Local Infrastructure Impact: This does not seem directly relevant to placemaking and we suggest could be omitted.</p>			
<p>Built context</p> <p>Building and street heritage: Existing buildings and structures: recommend retention of traditional buildings is sought as a general principle as they can</p>	SNH	<ul style="list-style-type: none"> • Building and street heritage: The emphasis of this point is already there in the section. • Safer by Design: updated to reflect comments. 	No change to built heritage section. Safer by Design & Public spaces sections updated with new wording proposal.

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<p>add to the distinctive character, quality and heritage of a place.</p> <p>Safer by Design: Amend to “The front of the buildings within a street, a park or open space, should create an active frontage, with...”</p> <p>Public spaces: Public spaces, their design and their location, their interaction with green networks and frontages and other infrastructure are a central placemaking issue. We recommend the contribution of public spaces to masterplanning, green networks and streetscape is added.</p> <p>Red box - add ‘consider siting of public spaces as opportunities to act as central points/nodes for active travel and green networks.’</p> <p>Streetscape: This is also central to placemaking and we recommend it is integrated with the section on roads to focus on how to design streets for people. We suggest this is co-ordinated with the Council’s roads department (for example guidance on what the Council’s requirements are when designing shared surfaces).</p> <p>Add “Use of appropriate street trees is encouraged. These can significantly enhance quality of place in streetscapes, add shelter, biodiversity, habitat connectivity and help reduce pollution.”</p> <p>Boundary treatments: we agree with the statement that boundary treatments can play a significant role in creating legible and attractive streets.</p>		<ul style="list-style-type: none"> Public spaces: Additional wording agreed to. Streetscape: Street trees can be very positive but there are sometimes issues with regards to maintenance issues and therefore this is something that needs to be discussed with Transport Planning and Community Greenspace before further advice is provided. Boundary treatments: The guide already encourages hedges so the suggestion of updating the wording is not required. 	No change to Streetscape or Boundary Treatments.

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
We suggest adding “New boundary treatments should add to cohesiveness of a place, for example continuation of attractive and appropriate existing boundaries. As a general principle, new hedges are encouraged where appropriate.”			
<p>Accessibility and permeability</p> <p>Transport Assessment: Add that active travel and vehicle circulation and the layout of the hierarchy of transport routes should be shaped by a multi-disciplinary team during the masterplanning process which overlays all the various functions within a site and coordinates them. Consideration should be given to the impact of traffic on the amenity and enjoyment of public spaces and to minimising the impact of busy routes by locating them away from open spaces, green networks or other places of interest.</p> <p>Street-layout: We recommend adding this new section. The layout of access roads should respond to landscape views by creating vistas. It should aim to create a distinct and legible non-labyrinthic pattern that helps orientation by providing foci and visual and spatial continuity, including larger scale continuous connections across a site and beyond. The layout should be based on a clear hierarchy of</p>	SNH	<ul style="list-style-type: none"> • Section on Access integrated into new section on Movement and updated to incorporate “Designing Streets” hierarchy. • Street layout section added into Movement & Streets section. Linkage made to “Designing Streets”. • Streets advice updated to reflect comments. • Section on footpaths reflects much of the this suggested changes already and it is considered that these proposals are just rewording of the section so no change proposed. • The sections on cycling and parking have been written in accordance with advice from Sustrans and Transport Planning. It is therefore considered that they cover the relevant issues. A link to the Sustrans website has been added. 	Access section significantly updated to reflect comments regarding “Designing Streets”. Hyperlink made to “Designing Streets”. Bullet points updated to reflect comments in Streets section. Hyperlink to Sustrans website has been added.

Comment	Received from	PKC Officer response	Change to be made to Guidance
<p>Relevant section/paragraph of Guidance</p> <p>roads that differ in their function, length or continuity and spatial arrangement across its width. Traffic calming through these labyrinthic, short range visibility patterns should not become the defining factor of the street layout of a new development as it can result in non-legible townscapes where there is no larger scale continuity and it is hard for people to orientate. It can also remove the benefit of vistas into the landscape which contribute to the amenity, distinctiveness, a sense of place and a sense of orientation (such as in Crieff High street looking towards the Highland Boundary Fault or in Edinburgh New Town looking towards the Firth of Forth). Rather, it should be achieved with other measures such as alternate planting or car-parking.</p> <p>Streets: 1st para, final sentence: add “proximity to existing transport networks, including green networks and active travel, utilities..”</p> <p>“...Design should therefore respond to the following: (add)</p> <ul style="list-style-type: none"> • Site features (add) “such as topography and views into the wider landscape” • Orientation (easy to move around) and overall legibility of the geography of the development (the layout needs to have a strong and memorable rationale) • Hierarchy of streets and street typologies (these can be shown in profile in their spatial arrangements and function) 			

Comment	Received from	PKC Officer response	Change to be made to Guidance
<p>Relevant section/paragraph of Guidance</p> <ul style="list-style-type: none"> • Arrangement of buildings (this is not clear, recommend replacing with “Relationship between buildings to the streetscape”) Streetscene and spaces • Add: Connectivity across the site and between points of interest” • Insert link to Scottish Government’s “Designing Streets:” <p>Access and paths, 2nd para, add “The development should link and connect to existing core paths and off road active travel routes and provide new links to connect to these routes where required.”</p> <p>We suggest adding: “The layout of a pedestrian circulation network should aim for a high degree of permeability and connectivity across a new development, aligning pedestrian with active travel routes and green networks and ensuring they connect locations of interest such as schools, community hubs and green spaces with their surrounding neighbourhoods. They should also tie in with the wider path- access- and green networks around the site.”</p> <p>We agree that shared surfaces are a good example of the benefits of a non-separation between pedestrians and cars. However where there are substantial traffic volumes the benefits of separation outweigh these in terms of amenity and health of pedestrians. Heavily used main-through routes</p>			

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<p>Relevant section/paragraph of Guidance</p> <p>should also be located away from amenity and public spaces and green infrastructure.</p> <p>Cycle routes and cycle friendly infrastructure</p> <p>1st sentence: change 'should' to 'must.' 2nd sentence "Access to safe and direct routes for cycles will reduce car usage significantly if properly connected, so providing new links to the existing cycle network and creating new routes can help.."</p> <p>We refer to "Cycling by Design" (Transport Scotland 2010, revision 1).</p> <p>1st bullet: it is unclear what is meant by 'a wide range of users' – is this solely cyclists or other users? Suggest clarify how and by whom the routes are for - separating pedestrians and cyclists from traffic where possible and aim to tie these routes in with the green infrastructure network. Add: "Aim to separate cycle-paths from vehicular traffic and integrate cycle routes with other paths and as part of green networks."</p> <p>Parking Arrangements</p> <p>Add: " Extensive areas of car-park should be avoided near areas where people live. If car-parks cannot be avoided the design should consider the car-park's appearance and potential for shared use as public space when it is not in use. Street-trees are an inexpensive way to compensate for the visual impact of car parking, provide for climate regulation and biodiversity – aim for larger car-parks at least one tree for every 5 car parking spaces."</p>			

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Relevant section/paragraph of Guidance			
<p>Orientation of Development Supports the use of the phrase ...”new developments must provide evidence that the visual impact of the development has been acknowledged.” The word “acknowledged” is very significant here in that it allows for the applicant to explain how they have addressed the visual impact without having to apply a standard approach to it.</p> <p>Edge of Settlement (p17) Agree that settlement edges require careful consideration and that there are factors such as long-term growth to consider. The Planning Authority could consider allowing a more positive planning framework to windfall development on settlement edges where there would be a significant improvement in the visual impact of a settlement edge, and where development would bring a positive Placemaking result (for example through a softer development edge and/or a gateway to a settlement). Evidently this would need to be a proportional proposal in relation to settlement size and infrastructure capacity etc.</p> <p>In relation to Drainage and SuDs requirements while the desirability of using porous surfaces to minimise run-off is very welcome, it should be clear whether or not the Local Authority will also be willing to adopt porous surfaces. This has not always been the case.</p> <p>Regional and Local Infrastructure Impact (p19)</p>	<p>Errol Estates/Scone Estates</p>	<p>Edge of settlement section has been updated to emphasis the importance of native planting etc to create a rural feel to new development. Issues regarding windfall should also adhere to this. However, for issues relating to the Development Boundary identified within the LDP, this is an issue for the LDP consultation and not for the Placemaking Guide which is simply to provide guidance about new development. This also applies to the comments regarding Housing in the Countryside. This is a policy in the LDP and is also covered in the Housing in the Countryside SG. A link has been provided for this in the Technical Notes section of the Guide. Work in terms of the Council’s approach to SuDS is underway and it is agreed that there needs to be consistency amongst departments. However, the Guide is there to provide best practice advice and as SuDS can provide a range of benefits in terms of biodiversity and recreation, the guide encourages creative solutions. The Regional & Local Infrastructure section has been removed from the Guide as it is considered that this is covered by other sections of the Guide.</p>	<p>Hyperlink for the Housing in the Countryside SG been made in the Technical Notes section of the Guide. The Regional & Local Infrastructure section has been removed from the Guide.</p>

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
<p>Concerned about the onus placed on applicants to “<i>analyse current capacity and potential future demand</i>”. For matters such as foul drainage or grid capacity a formal approach to Scottish Water or the electrical supplier will provide a position-in-time answer for a respective detailed layout.</p> <p>Creation of new focal points and landmarks Supports the guidance suggesting new development can create new landmarks and focal point both for the site and the surrounding area.</p> <p>Semi-Private Open Spaces In relation to “Private Garden Spaces” it would be useful if the Guidance also referred to the best ways to approach this provision in traditional steading developments.</p>			
<p>On page 14 it is states that “<i>Furthermore, buildings should have a southerly aspect for private spaces and living room, taking advantage of the maximum hours of daylight.</i>” This is an unreasonable requirement. Particularly for a larger housing development where constraints must be dealt with as well as many competing design requirements it will be impossible to provide a layout where all homes face south, are one room deep with south facing gardens (if that is what’s meant by ‘private spaces’). It should be amended to instead state that</p>	Homes for Scotland	The Guide is not meant to be proscriptive but is encouraging of best practice. It is not considered unreasonable to design sites to be as resource efficient as possible. The Listed Building section has been updated in conjunction with HES comments.	No changes.

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
<p><i>“subject to other design considerations properties should be position to ensure access to adequate levels of daylight and sunlight”.</i></p> <p>The requirement is also covered to some extent by the requirement for SAP calculations as part of the Building Standards process. 2</p> <p>On Page 21 the statement that <i>“Where the buildings are listed, these will have to be preserved and enhanced through conversion and should be incorporated into the proposal”</i>, is not consistent with HES guidance which allows in certain circumstances for harm to the significance of listed buildings to be weighed against public benefits associated with the proposal. This wording should be amended so it’s consistent.</p>			
4. Action Programme			
<p>It is difficult to distinguish between the Technical notes and the Supplementary Guidance and having too many documents to refer to can be very confusing. Recommendation that the technical notes become “Technical Appendices” contained within the Supplementary Guidance documents</p> <p>Support the commitment to monitor the impact and success of the Guidance and revise it accordingly and consider that the Design Panel, if used in proportion to the significance of the development, is</p>	<p>Scone Estates and Errol Estates</p>	<p>Technical Notes have now been incorporated into the Guide itself.</p>	<p>Technical Notes are now chapter 5 of the Guide.</p>

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Relevant section/paragraph of Guidance			
<p>a very positive approach as long as the timings for the Design Panel's input are carefully handled and the Panel is able to react swiftly to proposals and not slow down development. It should also be made clear what scale of development would trigger a Design Panel approach</p> <p>Welcome the Design Training proposed and the fact that it includes public, private and community sector audiences. Consider that this should be extended to agents and architects and planning consultants active in the area. We consider that being trained together can create a much more collaborative approach which will be of real benefit to Placemaking in Perth and Kinross.</p>			
1. Masterplanning			
<p>We acknowledge the Technical Notes on Masterplanning as part of the Placemaking SG however we suggest that where large sites are subject to a masterplan it is not always possible to achieve a single agreed outcome where there are a number of ownerships or developers with options to take forward the site. In such circumstances the requirement to produce a single masterplan covering the entire site can have the effect of stymieing the development particularly in circumstances where not all parties are willing to</p>	Strutt & Parker	<p>It is best practice to achieve an overall design for a site rather than piecemeal development that does not have a comprehensive approach to all the issues. In cases where there is a number of owners, it is important that they recognise the need to work as a collective to ensure the best design possible for the site and for the community.</p>	No change.

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
engage in the masterplanning process. While we do welcome the principles of the masterplan process and what it can achieve in assisting the delivery of a well-planned, well-connected and serviced site we would ask the Council to be cognisant of such issues as set out above when applying a requirement for a single masterplan outcome for any site with multiple ownerships or developer interests.			
<p>How does the proposal respond to environmental constraints and opportunities?</p> <p>Recommended amendments:</p> <ul style="list-style-type: none"> • The proposal fits into the landscape and the natural topography and is designed to avoid excessive re- levelling or terracing of the site. It introduces or reinforces structural landscaping where appropriate. • Flood risk has been considered and mitigated against. Drainage and SUDS are considered from the outset and are designed, based on the existing natural drainage patterns and as part of the wider green infrastructure • Buildings and public spaces are orientated to maximise solar gain and views to the wider landscape or greenspaces • Existing natural features such as hedgerows, trees or watercourses have been surveyed and incorporated in the right locations with 	SNH	Re-wording and additional points agreed with and Guide updated accordingly.	Masterplanning section changed to reflect comments made.

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
<p>the layout and design of the proposal - shelter belts and wildlife corridors are retained with adequate buffer space around them and connections are enhanced.</p> <ul style="list-style-type: none"> • Add: The layout of access roads should respond to landscape views by creating vistas and aim to create a distinct and legible non-labyrinthine pattern that helps orientation by providing foci and visual and spatial continuity including some larger scale continuous connections across a site and into other neighbourhoods, overall providing a clear hierarchy of roads that differ in their function, length and width • Add: "The proposal includes a highly functional network of walking and cycling paths forming larger connections across and beyond the development, linking points of interest and greenspaces. These should be wherever possible be separate from vehicular traffic and aligned with proposals for green networks and greenspaces and connect into existing routes." <p>How does the proposal relate to the existing townscape?</p>			

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
<ul style="list-style-type: none"> Add: Enhance streetscapes and car parking with wide pavements or shared surfaces, street-trees and other linear blue-green infrastructure such as swales to improve amenity and biodiversity and compensate for urban density throughout new developments. 			
<ul style="list-style-type: none"> Page 2 - the mention of flood risk and SUDS is welcomed. Page 4 – Checklist of reports – against Technical Data, Flood Risk Assessment could be mentioned in addition to Drainage Impact Assessment. 	Structures & Flooding Housing and Environment Service Perth & Kinross Council	Flood Risk Assessment also added as an example.	Checklist of Reports for Masterplanning updated.
2. Housing in the Countryside			
<p>How does the proposal facilitate sustainable transport?</p> <p>The proposal has a legible street pattern that connects strongly into neighbouring areas, existing or future development and improves connectivity - cul-de-sac layouts should be avoided</p> <p>We recommend replacing some illustrations in this section; these may mislead given they are urban rather than rural examples.</p>		The Housing in the Countryside SG has now incorporated the Technical Notes and therefore the Placemaking Guide now provides a link for it in the introduction to the Technical Notes.	Housing in the Countryside Technical Note now removed.
3. Sustainability			

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
<ul style="list-style-type: none"> Page 1 - the mention of surface water runoff is welcomed. Page 3 – At the end of the first paragraph, add “...increased surface water run-off. This shall be considered through the preparation of a Drainage Impact Assessment.” Page 3 – Development Checklist - amend the sentence “Where drainage is required, SUDS (sustainable drainage systems) are in place to reduce the total amount, flow and rate of surface water run-off as well as providing treatment before discharging into a storm sewer or watercourse.” – could be worded better. We would suggest the following revised wording: “Where required, SUDS (sustainable urban drainage systems) are in place to attenuate the flow of surface water run-off as well as providing treatment before discharging into a storm sewer or watercourse.” Page 4 – We welcome the clear requirement “The ownership and responsibility for maintenance of each SUDS element is clear and long term management is in place” We would recommend a link be included to the Flood Risk and Flood Risk Assessments Supplementary Guidance 	Structures & Flooding Housing and Environment Service Perth & Kinross Council	The Sustainability Technical Note has now been incorporated into the body of the Guide, specifically in the Resource Efficient section as well as the SuDS & planting sections.	Technical Note advice incorporated into chapter 3 of the Guide.
4. Window & Doors			
Generally considers that the approach to Windows & Doors in Conservation Areas is too restrictive and	A member of the public	The Guide is simply reflecting best practice and legislation in terms of Listed Buildings and	No change.

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
not reflective of the existing materials used on many of the buildings in these areas.		Conservation Areas. The guidance has been prepared by the Council's Conservation Officers and provides further detail on what they advise applicants to do in terms of these issues.	
In both the section on windows and doors in the Technical Notes the boxed statement contains the following wording which is factually incorrect. "It is an offence to alter the character of a listed building without permission, and this applies to windows/doors. Work to listed buildings of national or regional importance (category A or B listed buildings) must be formally approved by Historic Environment Scotland" We would therefore recommend this be altered to; "Work that alters the character of a listed building requires Listed Building Consent which is issued by Perth and Kinross Council."	HES	Agreed that statement needs updating.	Wording changed to: "Work that alters the character of a listed building requires Listed Building Consent which is issued by Perth and Kinross Council."
New draft supplementary guidance: <ul style="list-style-type: none"> Lacking in acknowledgment of the fact that sometimes a contemporary solution/addition can be more appropriate than a traditional solution – in particular in relation to where a building changes use. The wording needs to be more specific or less sweeping – e.g. "Modern stained finishes are not acceptable" is not helpful. Perhaps the council could be more specific as to which thicknesses of double glazing units may be preferred, and where this may 	A member of the public	The Technical Notes on Windows & Doors is specifically focused on Listed Buildings and Conservation Areas. There are opportunities to have more contemporary approaches in new development. With more specific details on these issues, it is best to discuss in advance with the Conservation Officers. It was requested by consultees that they provided examples of good contemporary designs but none were submitted. Therefore, the examples provided have remained but can be updated if and when newer examples can be	No change.

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
<p>be more favourable, e.g. renovations of homes.</p> <ul style="list-style-type: none"> • Technical guidance makes branding shopfronts etc difficult. • Guidance does not encourage variety of design. • Guidance cannot always apply due to other factors e.g. limited technology. • Guidance needs to be more consistent generally so it can be more easily implemented within design drawings/ the architecture process. 		<p>sourced. Some of the detail requested would not be appropriate for a Placemaking Guide – the Technical Notes are there as a guide but are comprehensive. They cover some the issues most often enquired about. The purpose of the Placemaking Guide is to get a more consistent approach to development. It will be monitored in terms of its success and further feedback on its use will be collated during the monitoring of the policy and guide.</p>	

**Comments on Air Quality and Planning
draft supplementary guidance**

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
General observations seeking changes			
Much of the air pollution legislation is old and therefore PKC must be prepared to uphold this legislation correctly, which has not always been the case in the past.	Scone & District Community Council	Local air quality management duties are carried out under Part IV of the Environment Act 1995. The supplementary guidance also makes reference to the current Scottish Government and partner organisations policy, strategy and guidance documents e.g. 'Cleaner Air For Scotland'.	No
Much of what is recommended is too general, who is to define 'reasonable' etc. Specific controls and requirements are needed.	Scone & District Community Council	This comment is noted. However, the guidance is intended to be used to determine if proposals are likely to generate the need for an Air Quality Impact Assessment (AQIA) and, if required, how the assessment should be carried out. It is for individual AQIAs to address 'specific controls and requirements' ensuring that they are necessary and proportionate.	No
Cognisance is not taken of the fact that lower levels of air pollution adversely affect flora and fauna. This should be taken into account when countryside developments occur.	Scone & District Community Council	This comment is noted however the guidance intentionally focuses on human health in line with air quality legislation and current policy, strategy and guidance documents. The interests of flora and fauna are already covered elsewhere by statutory powers.	No

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
1. Introduction			
Paragraph 1.1 could explain some of the reasons for strict pollution control. Quotes could be taken from, for example, 'Every breath we take: the lifelong impact of air pollution'. This would alert the developer to the reasons for such control and might allow more thought re this to go into proposals. This paper, by the eminent Royal Colleges of Physicians and paediatricians, states 'Each year in the UK, around 40,000 deaths are attributable to exposure to outdoor air pollution ... Air pollution plays a role in many of the major health challenges of our day, and has been linked to cancer, asthma, stroke and heart disease, diabetes, obesity, and changes linked to dementia.'	Scone & District Community Council	This comment is noted however the guidance does not intend to set out the reasons for pollution control as this is already set out elsewhere. Its intended purpose is to determine if proposals are likely to generate the need for an Air Quality Impact Assessment (AQIA) and, if required, how the assessment should be carried out.	No
Paragraph 1.2 amend the list of who this guidance is for to include Council Officers, because not all 'builds' are by developers e.g. the CTLR.	Scone & District Community Council	It is unnecessary to amend the guidance to clarify this point because the guidance is intended to apply to all planning applications, regardless of whether the applicant is a Council Officer.	No
Paragraph 1.4 it is worth noticing that these AQMA's have been in operation for five or more years and thus efforts to prevent worsening must be stringent. This could be stated.	Scone & District Community Council	There would be merit in amending the guidance to include a link to the Air Quality progress reports, which are published on the Council website in fulfilment of Part IV of the Environment Act 1995.	Amend paragraph 1.4 with a link to www.pkc.gov.uk/airquality

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
2. Our responsibilities, policies and the local air quality situation			
More information should be provided on the national and regional context of sustainable and active travel including Perth & Kinross Council's Active Travel Strategy which all support a mode shift from car use to sustainable travel which will have a direct impact on air quality across Perth & Kinross.	Tactran	There would be merit in amending the guidance to include a link to the Active Travel Strategy.	Insert a new paragraph following paragraph 2.3 with a link to Active Travel Strategy
Support for the reference to CAFS, the acknowledgement that a key objective of the national strategy relates to placemaking and the fact that CAFS highlights one of the reasons for non-compliance is topography and creation of street canyons as these issues should be addressed during place design.	SEPA	Support is acknowledged.	No
Policy 1 – Placemaking. The text under section 2.3 states that good air quality is recognised in the placemaking policy with regards health and wellbeing. Unfortunately on reviewing the wording of policy 1 we can see no such commitment within the proposed plan policy text, although we would support such an inclusion.	SEPA	Good air quality is identified as one of several environmental considerations to be researched and responded to in the placemaking process. While it is referenced in the Placemaking Supplementary Guidance, it is acknowledged that there is no longer explicit reference to it in Policy 1 Placemaking; instead Policy 57 Air Quality refers.	Amend section 2.3 to delete the words '...in this policy...' and insert a new reference to the Placemaking Supplementary Guidance instead.
We agree with the ambition to protect and improve public health through safeguarding air quality and reducing and restricting harmful emissions in built up areas.	Strutt & Parker	Support is acknowledged.	No

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
Paragraph 2.1 it should be stressed that developments which feed in to AQMAs need to be restricted, and that cumulative effects of development downstream must be taken into consideration as outlined in the Client Earth QC opinion, and as required by Councils, by Scottish Government head of planning. This is mentioned in Box 2 but the regulation is not quoted and it should be.	Scone & District Community Council	This issue was addressed as part of the LDP examination, and the relevant policy was updated so it now refers to all areas, not only AQMAs. The requirement to take this into account is found in Local Air Quality Management technical guidance TG-09 and TG-16 .	No
Policy 1A is too non-specific. There should be a ratio of green space to housing numbers. Apart from brown field sites, developments are in the countryside. To avoid urban sprawl and very poor place making actual hectares of green space/ house number should be specified or at least given as an example of what would be expected. This should be easy to do, and if in consultation with the Scottish Government can be enforced. As written there is no mandate at all to follow, the words reasonable, sensitively, satisfactory do not mandate. This is too general.	Scone & District Community Council	This is a comment on the policy in the proposed plan. The issue of Placemaking has already been considered as part of the LDP examination and in related Supplementary Guidance.	No
Policy 1C developers are getting round development size by putting forward application of small nos many times. It should be stated clearly here that if planning in principal is awarded for a no of houses over 200 then submission of individual small nos must follow these rules for >200 houses	Scone & District Community Council	This is a comment on the policy in the proposed plan. This issue has already been considered as part of the LDP examination. The cumulative impact of development is taken into consideration.	No

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
Policy 1D there should be a pre-specified range of houses allowed in the development in this document. Recent behaviour of developers shows that nos have increased steadily above those initially granted, and as such there is no public consultation on those increased nos. This should be reasonable eg 5% above, and here it should also state that PKC have the right to reduce house nos to preserve green space and air quality	Scone & District Community Council	This is a comment on the policy in the proposed plan. This issue has already been considered as part of the LDP examination.	No
Box 2 (Policy 55) it must be stated that this will apply to all future detailed applications, even if planning in principal has been awarded for a large development in principal eg H29	Scone & District Community Council	This is a comment on the policy in the proposed plan. This issue has already been considered as part of the LDP examination.	No
Box 2 the placement of the diffusion tubes in some areas does not comply with standard good practice ie behind hanging flower baskets. This document should state that it will measure using standard good practice. The Council should publish its high resolution dispersal model, which must not replace actual measurement.	Scone & District Community Council	This is a comment on the policy in the proposed plan. This issue has already been considered as part of the LDP examination. Referring to the specific comments about diffusion tubes, their placement and repositioning is in line with TG-16 guidance and subject to frequent checks. The dispersal model cannot readily be published however relevant data can be provided as required.	No

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
Paragraph 2.5 please define 'close to' as AQMA. Unacceptably vague	Scone & District Community Council	It is accepted that it is difficult to place an exact figure on 'close to' because this depends on the facts and circumstances of each case. It is typically in the region of 25m however other factors are taken into account not just physical proximity to a road or AQMA.	No
3. How Air Quality will be considered for planning applications			
Air quality should be considered in advance of any road modifications being made. As an example the recent plan to include a roundabout at Crook of Devon ignored the fact that by doing so will increase the particulate and smog around the junction, severely impairing the quality of life of the residents there.	A member of the public	This is already provided for in the draft guidance. At the (pre-application) screening stage, road modifications such as realignment or the introduction of a new junction that significantly changes vehicle acceleration or deceleration were included in the Stage 2 criteria for determining if an air quality assessment is required (box 4)	No
Paragraph 3.2 this list should also include near to or feeding into an already designated AQMA	Scone & District Community Council	This is already provided for in the draft guidance. At the (pre-application) screening stage (box 3) the impact on existing AQMAs is required to taken into account.	No

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
<p>Paragraph 3.2: Medium Combustion Plant Directive</p> <p>The Medium Combustion Plant Directive has been transposed into Pollution Prevention and Control Regulations and therefore medium combustion plant with a net rated thermal input of between 1 and 50MW that are put into operation after 20 December 2018 must be registered/permitted by SEPA under Pollution Prevention and Control Regulations and will require to meet specified emission limits, depending on the size, type of fuel, etc.</p> <p>Assessment of air quality and stack heights for these developments will however be for the local authority to consider at planning application stage as these issues will not form part of the PPC permit application for Medium Combustion Plant Directive developments, unless there is an impact on relevant conservation sites. Further relevant information is available on our website from the following link: https://www.sepa.org.uk/regulations/pollution-prevention-and-control/medium-combustion-plant/. We recommend that contact is made with your Environmental Health colleagues with regards this issue.</p> <p>We have suggested the inclusion of a further paragraph in section 3.2 to address this point.</p> <p>‘Do I need to be aware of any other requirements relating to air quality?’</p>	SEPA	Agreed.	Insert a new paragraph at section 3.2 to address this point, using wording supplied by SEPA.

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
<p>Proposals for large commercial or industrial installations that have the potential to emit pollution may be regulated under the Pollution Prevention & Control (PPC) regime and will normally require an air quality assessment as part of the permit application. To avoid duplication of effort the same air quality assessment could be used to help determine the impact of the development in terms of air quality for a planning application. However, if a scheme changes through the permitting process we would expect to be notified of the changes and information provided regarding the effect on air quality.</p> <p><i><u>It is noted that medium combustion plant with a net rated thermal input of between 1 and 50MW that are put into operation after 20th December 2018 must be registered/permitted by SEPA under Pollution Prevention and Control Regulations and will require to meet specified emission limits, depending on the size, type of fuel, etc. Assessment of air quality and stack heights for these developments will however be for the local authority to consider at planning application stage as these issues will not form part of the PPC permit application for Medium Combustion Plant Directive developments, unless there is an impact on relevant conservation sites.'</u></i></p>			
It is appropriate to request Air Quality Impact Assessments in relation to proposed developments in sensitive areas that are likely to result in a significant increase in dust or energy or transportation related carbon emissions.	Strutt & Parker	Support is acknowledged.	No

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
We highlight that Air Quality Impact Assessment (AQIA) is unlikely to be required in all cases where development is proposed; while a proposed development may increase traffic on the local road network the scale of the proposals and the capacity of the existing infrastructure are critical factors in determining whether it is likely that any increase in traffic associated with the proposals would result in a consequent increase in transportation emissions beyond the construction phase.	Strutt & Parker	It is agreed that there should be provision to screen out certain proposed developments. This is already provided for in the draft guidance. At the (pre-application) screening stage (box 3); and at the screening stage (box 4)	No
<p>We welcome the inclusion in the draft SG of criteria to help identify scenarios where an AQIA is required and what this assessment should cover. However, we highlight an issue in how the Council may seek to apply this wider policy guidance, especially in a rural context.</p> <p>We note in particular the current practice by the Council's Environmental Health department of seeking to attach conditions to planning permissions which would exert control over the installation of domestic stoves in new developments in rural locations. We note that only two Air Quality Management Areas (AQMAs) have been declared across the Council Area – these being all of Perth and Crieff High Street. We therefore consider that to permit the practice by internal departments of requesting conditions on domestic scale installations outwith any defined AQMA is contrary to good planning practice and would have the effect of undermining the correct application of Permitted Development Rights (PDR) in relation to domestic microgeneration.</p>	Strutt & Parker	<p>While the remit of this Supplementary Guidance is limited to Air Quality and Planning issues, there are a wider range of other material considerations that also need to be considered when determining planning applications.</p> <p>The reason for imposing specific conditions on the grant of planning permission may be for several reasons, not only air quality.</p> <p>These include potential wider amenity issues, and the potential for the proposed development to cause nuisance. Sometimes information is requested for reasons other than Air Quality issues. These issues are not within the scope of this Supplementary Guidance.</p>	No

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
<p>In this regard we note the provisions of primary legislation viz the <i>Town and Country Planning (General Permitted Development) (Scotland) Order 1992</i> and <i>Scottish Statutory Instrument No. 34 (2009): The Town and Country Planning (General Permitted Development) (Domestic Microgeneration) (Scotland) Amendment Order 2009</i>, which set out the parameters for which the installation of domestic stoves and biomass would be considered to benefit from PDR. This is further detailed in the Scottish Government's handbook for Domestic Permitted Development and in the Government's technical note on Microgeneration (see https://www.gov.scot/publications/microgeneration-planning-advice/).</p> <p>The legislation and guidance all confirm that PDR is in place for Microgeneration which would allow biomass systems generating up to 45kW of heat, unless such installations are located in AQMA's or Conservation areas wherein Article 4 restrictions on PDR can be imposed by the Planning Authority.</p> <p>For a Council department to subsequently suggest the imposition of a condition relating to the installation of such outwith either a Conservation Area or declared AQMA would appear to be at odds with primary and secondary legislation and furthermore would contradict several of the tests that apply to the application of planning conditions to planning permission. In particular, we consider that any condition that seeks to control the installation of domestic stoves or biomass features in proposed</p>			

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
<p>developments outwith declared Conservation Areas or AQMAS could not be considered to be necessary, relevant to planning, enforceable nor reasonable.</p> <p>Therefore, while we welcome additional guidance on how the Council will consider air quality issues as they relate to planning we consider that the Council has a responsibility to ensure that good practice is applied in relation to all elements of air quality and planning.</p>			
Box 4 Indicative Criteria for Requiring an Air Quality Assessment. Traffic volume. This must apply to the whole development otherwise developers can submit many multiples of 99 annual average daily traffics and avoid EIS	Scone & District Community Council	The indicative criteria are sourced from EPS/RTPI Delivering Cleaner Air for Scotland 2017, and a cumulative assessment is required.	No
Box 4 the word 'adjacent' must be defined. It is usually defined as five miles. Without this the document has not the required rigour, not to developers have any knowledge of when there could be a problem	Scone & District Community Council	The indicative criteria are sourced from EPS/RTPI Delivering Cleaner Air for Scotland 2017. It is accepted that the wording allows for consideration of the facts and circumstances of each case.	No
Paragraph 3.3 this should read: 'should be proportional to the whole development not just the part submitted'	Scone & District Community Council	The paragraph states that the cumulative air quality impacts are required to be considered.	No

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
4. Mitigation of air quality impacts			
Paragraph 4.2 mitigation should include green space defined allowances (as above) and tree planting. Tree lined walking routes should be another example	Scone & District Community Council	The issue of Placemaking (including design issues and green space) is linked to air quality but is considered separately as part of the LDP examination and in related Supplementary Guidance.	No
Section 4.3: Section 75 Planning Obligations This should reflect the Council's developer contributions policy which will assist in delivering all phases of Perth's Transport Future which by reducing City Centre traffic within Perth will have a positive impact on air quality.	Tactran	<i>The Developer Contributions and Affordable Housing Supplementary Guidance includes the legal background and policy detail including contribution requirements towards transport infrastructure. In the case of air quality, the Council is focusing on avoiding adverse impacts from proposed developments by incorporating mitigation within the design of the proposed development.</i>	No
Best Practice Design Principles [Box 5] Detailed information is reproduced from EPS Guidance that has specific site requirements in terms of EV charging infrastructure along with travel planning guidance. However, it is stated that this "May not always be applicable for Perth & Kinross Council". It would be useful if it was clarified which elements would apply and in what circumstances.	Tactran	This is intended to be an example of some general principles of design that could be incorporated to mitigate air quality impacts.	Delete text below box 5 '...'* May not always be applicable for Perth and Kinross Council'. Delete asterisk at top of page.

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
Appendix A: Technical Guidance for Conducting Air Quality Impact Assessments			
A.2.5 Monitoring. This should include the advice about not measuring during school holidays. Annual changes occur so the 3-6m monitoring should be divided up in time.	Scone & District Community Council	The requirement to take this into account is found in Local Air Quality Management technical guidance TG-16 .	No
General comments that do not seek any changes			
It is good to see that key health issues will be addressed throughout the planning process.	NHS Tayside	Support is acknowledged.	No
Content with those aspects of the guidance that relate to the historic environment	Historic Environment Scotland	Support is acknowledged.	No
Tactran supports the general policies proposed to manage air quality in Perth and Kinross and notes that many of the key issues relate to transport and in particular vehicular traffic. Measures to reduce vehicular traffic align with Tactran's objectives as well as policies that promote the uptake of ultra-low emission vehicles.	Tactran	Support is acknowledged.	No

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
The content of the guidance is sufficient to allow developers, or consultants acting on their behalf, to determine if their proposal is likely to generate the need for an Air Quality Impact Assessment (AQIA) and, if required how the assessment should be carried out. The assessment of significance of impact is in line with Environmental Protection Scotland/Royal Town Planning Institute Scotland guidance document “Delivering Cleaner Air for Scotland, Development Planning & Development Management January 2017”. The requirements for dispersion modelling are in line with statutory Technical Guidance LAQM TG (16). We support the production of this guidance as it should help support delivery of the objectives of the national strategy Cleaner Air for Scotland.	SEPA	Support is acknowledged.	No
In general, it is excellent to see such a document being prepared by the Council. This is a key health matter. But its impact will depend on rigorous application by Council Officers and more specific guidance to Developers	Scone & District Community Council	Support is acknowledged.	No
Comments seeking changes to formatting etc.			
Regarding the flow charts, the dark red colour is no good as you can't read the print on the red	A member of the public	Agreed, the design will be changed to avoid this problem	Amend colours in figure 3

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
Comments seeking changes to other areas (not Air Quality)			
<p>As a general comment, we note references throughout the draft SG documents to the desirability for developers and applicants to engage with the Council in formal Pre-Application enquiries particularly to establish what environmental assessment reports may be required to support the submission of an application. We consider that if the Pre-Application stage is to become mandatory for all proposals the Council should set and adhere to a maximum target date within which to meet with and respond to applicants.</p> <p>We also suggest that any and all agreements reached at the Pre-Application stage in relation to the type and extent of technical and/or environmental information that is required to be submitted alongside an application should be binding on all parties. We consider that this would remove some of the uncertainty associated with the application process and should encourage a more transparent approach for all parties which we believe will assist the Council to improve its determination rates and associated performance statistics.</p>	Strutt & Parker	This is a comment on the procedures relating to the submission and determination of planning applications It is not within the remit of the Air Quality and Planning Supplementary Guidance but has been passed to the relevant team in the Council.	No

Comments on Housing in the Countryside draft supplementary guidance

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
General comments			
Important, constructive and mature guidance which makes a significant contribution to setting a balance between protecting landscape and developing appropriate housing in rural areas.	Portmoak Community Council	Support welcomed	n/a
Support overall aims for Policy 19 and the general proposals. Guidance is now easier to read; diagrams and summaries are clear and helpful.	Glen Lyon & Loch Tay CC – comments supported by Fearnan Village Association	Support welcomed	n/a
Support need for SG and aims of Policy 19.	Scottish Land & Estates	Support welcomed	n/a
Content with those aspects of the guidance which relate to the historic environment.	Historic Environment Scotland	Support welcomed	n/a
Supports general principles outlined in SG.	Tactran	Support welcomed	n/a
Support the flexible approach towards housing in the countryside including the allowance for the development of rural brownfield land.	Network Rail	Support welcomed	n/a

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
Support guidance; flow charts are helpful.	A member of the public	Support welcomed	n/a
Guidance is only as good as its implementation; the Council must subscribe to the guidance.	Scone and District Community Council; A member of the public	The suggestion that the Council does not implement or subscribe to the guidance is refuted. (Note – All the comments from these respondents appear to have been made within the context of site H29 Scone North which is within the settlement boundary and therefore the Housing in the Countryside policy and guidance are not applicable.)	No
Needs better linkage to other Council documents but without repetition. Guidance is vague, discouraging, negative and is not set out logically making it hard to understand. Guidance should highlight positive examples rather than bad using more diagrams and pictures; good examples should be down to design and not just because they are small or well hidden.	CRGP	Disagree that SG is vague or illogically set out. Acknowledge that in some parts the SG does discourage development but only where this is necessary to protect the landscape. Agree that the SG could be improved by incorporating more diagrams, pictures and examples.	Yes More diagrams and pictures have been included
Essential that the technical notes are amalgamated into the relevant core SG to ensure transparency and ease of use; separate documents risks an inconsistent approach to development by applicants and the Council itself.	Strutt and Parker	Agree	Yes The Placemaking Housing in the Countryside Technical Note has been amalgamated into the SG.

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
Introduction			
Support statements on landscape protection and the emphasis on the re-use of rural buildings however this central statement of re-use is not carried through the guidance. This can be improved by placing re-use as the first consideration in the development hierarchy, strengthening the guidance wording to reflect this statement, and re-ordering categories 4-6 to the beginning of the guidance.	SNH	Appreciate reasoning but can't reorder for this revision of the SG as this would mean amending the policy itself. This can, however, be considered for LDP3.	No
Concerned that, with the designation of the Green Belt, there may in the future be more pressure for housing in the Braes of the Carse being a rural area out with the Green Belt. The SG must therefore be robust and sufficient to prevent inappropriate development of rural non-Green Belt land.	Braes of the Carse Conservation Group	SG is considered to be sufficiently robust to protect all areas of non-green belt land whilst still encouraging appropriate development in these rural areas.	No
SG should clarify guidance on housing in the countryside within the green belt; it does not limit the application of the proven economic need, conversions and replacement building tests to any particular Policy 19 categories e.g. all of these could apply to rural brownfield land. Development in the green belt could facilitate the objectives of directing growth towards cities and maintaining a vibrant countryside. Green Belt policy allows for SG to take this approach. Section 3.3. of the SG should therefore apply to all policy 19 categories and not just those in 'open countryside'. As a minimum the text box on page 3 should include category 6 as applying within the green belt.	RP Planning Ltd	<p>Categories 1-6 of Policy 19 correspond to the same categories in the SG. The Introduction on page 3 of the SG clarifies that the application of Policy 19 within the green belt is limited to categories 3.3, 4 and 5.</p> <p>Policy 19 and the SG reflect Policy 43: Green Belt which limits housing within the green belt area to proven economic need, conversions and replacement buildings. To amend the SG to include more categories would bring it into conflict with</p>	No

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
A wider scope of development should be allowed within the green belt, in particular categories 3.3, 3.1, 3.2 and 6. Of these category 6 rural brownfield land is the most important to assist in protective and enhancing the attractiveness of the green belt; the Estate has a number of unattractive brownfield areas which are uneconomic to remediate without the ability to promote a higher value land use.	Scone Estate	policies 19 and 43 of the Plan, neither of which can be changed until the next review of the LDP. Furthermore, it could mean that the Green Belt becomes almost indistinguishable in housing policy terms from all other rural areas in Perth & Kinross, bringing into question the value of having a Green Belt at all and potentially meaning the LDP is inconsistent with TAYplan	
For All Proposals			
If the pre-application stage is to become mandatory for all proposals the Council should set and adhere to a maximum target date within which to meet with and respond to applicants.	Strutt and Parker	As noted on p.4 of the SG, the pre-application stage is recommended but not mandatory.	No
<i>A Successful, Sustainable Place</i>			
Criterion (ii) Rural sites usually do not benefit from good transport links and if this were really required for all sites, almost no rural sites would be developed.	Meikleour Trust	Agree that criterion ii) would benefit from some rewording to improve clarity.	Yes Criterion ii) amended to clarify that proposals in less sustainable locations will only be permitted where the benefits outweigh the dis-benefits.

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
Criterion (ii) should be removed as this is a detailed requirement which has not been established in the LDP.	RP Planning Ltd	Policy 1: Placemaking requires all development to be planned and designed with reference to climate change, mitigation and adaptation which is considered to support criterion ii). It is acknowledged, however, that LDP policy is not so explicit as to specifically require sites to be in close proximity to public transport or a settlement with services. It is agreed therefore that it is appropriate to amend criterion ii).	Yes Criterion ii) amended
Criterion (ii) should note the equal importance of the proximity of housing to economic activity for creating successful, sustainable places.	Scottish Land & Estates	The amendment to criterion ii) noted above addresses this point as the specific reference to public transport or services is removed. Category 3 section 3.3 already allows for new housing which is justifiable on the grounds of economic activity.	No
Criterion (iii) welcome this section but suggest adding guidance on the reasonable size of garden ground i.e. this should be the appropriate size for the scale / form of the development.	SNH	Agree	Yes Criterion iii) amended
New houses in the countryside should be consistent with the style and nature of the buildings around them.	A member of the public	Building design is already covered in section iii)	No
Criterion (iii) welcome this section but recommend adding guidance on ancillary development e.g. scale, nature and form of associate workshops, garages, sheds and other ancillary buildings.	SNH	Agree but consider this sits better within criterion iv) rather than iii)	Yes Criterion iv) amended

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
Criterion (iv) – add ‘new developments should provide a high quality of design and finish that enhances its surrounding environment’.	SNH	Agree but consider this sits better within criterion iii) rather than iv)	Yes Criterion iii) amended
Criterion (viii) should be removed or reworded; Policy 27 only refers to a presumption in favour of retaining listed buildings and not to a strong presumption against.	RP Planning Ltd	Policy 27B presumes against the demolition of listed buildings. It is therefore considered appropriate to retain the presumption against in criterion viii) but amend the wording to more accurately reflect Policy 27 and 27B.	Yes Criterion viii) amended
A Low Carbon Place			
Criterion (i) should follow LDP policy and allow proposals the flexibility to present the best solution to contribute to sustainability.	RP Planning Ltd	Policy 1B requires resource efficiency and sustainable construction in all proposals and so it is considered important that this criterion remains to assist sustainability and to help protect and enhance local character. It is, however, considered appropriate to amend the wording to include ‘where possible’ at the start.	Yes Criterion i) amended
Criterion (i) is impractical in expecting existing on-site materials to be used in all cases because of the high costs involved and difficulty in reusing some materials. Building in rural areas is already more difficult due to servicing costs – this blanket requirement will make building in the countryside prohibitive.	Scottish Land & Estates		
A Natural Resilient Place			
Criterion (i) welcome this section on biodiversity enhancement, but it should provide examples of how this could be achieved e.g. native boundary hedges and trees, build integrated nest boxes into stonework, or provide new nest boxes.	SNH	Agree	Yes Criterion i) amended

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
Criterion (i) recommend protected species are dealt with in a separate sub-heading making it clear to potential developers that species surveys may need to be carried out at the appropriate time of year and that failure to do this may delay the planning decision. Reference made to the SNH website.	SNH	The sub-headings under For All Proposal reflect the four policy themes in LDP2. It is, however, agreed that a separate criterion be created under the Natural, Resilient Place sub-heading on protected species.	Yes New criterion created and amended
Criterion (ii) – welcome this section	SNH	Support welcomed	n/a
The SG should protect fruit orchards, if these are not specifically protected in LDP policy. These are particularly important in the Carse for historical and cultural reasons. The significance of orchards throughout Scotland is now being recognised. At present there is nothing to stop a landowner from clearing any orchard (refers case in Ballindean). TPOs would prevent their loss but the same could be achieved if the HiC SG made it clear that planning permission would not be granted for development on a site where there was or had been an orchard. Criterion on biodiversity should be expanded to include: “Furthermore, a proposal that involves the removal of an orchard or is in respect of an area on which there was previously an orchard shall also require to show that development would achieve significant and clearly defined additional public benefits.”	Braes of the Carse Conservation Group	It is acknowledged that orchards are an important cultural, historical and landscape feature in some parts of Perth & Kinross. This comment is primarily concerned with the protection of orchards which the SG cannot provide directly; there is not considered to be a justification for singling out orchards in relation to their role in enhancing or protecting biodiversity as opposed to any other type of habitat. It is, however, considered appropriate to include a reference to the felling of orchards to create a site under Category 1 building groups.	Yes Category 1, adding to a group, amended to include reference to orchards
Recommend SG is expanded to highlight that a feasible foul drainage solution is a requirement of all development.	SEPA	Agree	Yes New criterion created under A Natural, Resilient Place

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
<i>A Connected Place</i>			
Access to services and sustainable transport should be considered as part of any development proposals. Existing access and connectivity issues should not be exacerbated. Appropriate mitigation should be included as part of the development.	Tactran	Agree	Yes Criterion i) amended to incorporate suggestion
No mention in guidance of the impact and potential dangers of an increase in traffic from new houses in the countryside. Issues include: road narrowing by developers, contamination of roads by water, lack of attention to the maintenance of existing drainage facilities, and hazards created where a number of houses are built with just one entry / exit point. There appears to have been an easing of planning restrictions to allow applications which are not compliant with guidance and regulatory requirements.	A member of the public	The suggestions by Tactran will help reinforce the need to take into account the impact of increased traffic from new houses in the countryside. The detailed issues raised are a matter for the development management and enforcement processes.	No
Category 1 – Building Groups			
Second paragraph should be strengthened to: ‘The majority of the buildings should be residential’. Many redundant buildings are uninhabited. This could mean an existing group of 3 buildings comprises of 2 agricultural sheds which can have a distinctive character, size and nature.	SNH	In the current version of the SG, the use of buildings under this category is considered less important than the buildings themselves. The current wording therefore allows for non-domestic buildings to be included as counting towards the requirement for a minimum of 3 buildings. It is agreed, however, that it is appropriate that the majority of buildings in a building group should be residential or be buildings which would be suitable	Yes Category 1 amended

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
		for conversion to residential use under Category 5 of the Policy.	
The proximity of new houses to livestock is included under category 3 but not category 1. How / if / when will new residential development be assessed as part of such a group?	SNH	Criterion iv) under For All Proposals: A Natural, Resilient Place sets out how proposals for houses adjacent to working farms will be considered.	No
Overall the section needs strengthened – guidance is needed on the number of houses which could be acceptable in a building group and the factors that need to be considered when determining this e.g. landscape fit, nature and scale and functions of the existing building group.	SNH	Disagree that the SG should stipulate the number of new houses which can be added to a building group. This will vary depending on the layout and character of each group. Agree, however, that further clarification of the factors to be taken into account would be beneficial.	Yes Category 1, adding to a group, amended
Does not appear to address ‘creeping housing development’; larger scale developments may be refused but allowing numerous small applications can cumulatively result in the same number of additional houses.	Portmoak Community Council	If a proposal meets the provisions of Category 1 the fact that it adds to other new development within a building group should not automatically render the proposal unacceptable. Each planning application will be assessed on its own merits, taking into account other new development and consented sites.	No
Further guidance is needed on how a new house can fit into dispersed building groups; the focus is on more compact groups.	RP Planning Ltd	Agree	Yes Illustration added
SG does not define what is meant by ‘mature’ or ‘well established’ planting; hedge height is defined but no height is given for tree belts – guidance needs to be consistent across all categories.	Galbraiths	Acknowledge inconsistencies between Categories 1 and 3 regarding hedging but it is impractical to seek to provide a minimum height for tree belts.	Yes Inconsistencies between Categories 1 and 3

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
		The important issue here is that a suitable setting can be provided. It is not considered necessary to further define the terms highlighted; ultimately Case Officers have the knowledge and experience to be able to assess whether a feature such as a tree belt is sufficiently mature so as to be able to provide a suitable setting.	regarding hedging addressed
SG fails to acknowledge that in some areas post and wire fencing is a typical and prevailing rural landscape feature.	Galbraiths	For the purposes of this SG it is not considered that post and wire fencing can reasonably be considered a landscape feature when defining a site for new development.	No
Support third paragraph in relation to the creation of a site or woodland clearance.	SNH Glen Lyon & Loch Tay CC – comments supported by Fearnan Village Association	Support welcomed	n/a

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
SG should make absolutely clear that an attempt to artificially create a landscape framework for a site will not be accepted. This is stated in the Siting Criteria but not under Building Groups. In the second sentence, the word “will” should be replaced with “may”, the words “definable sites” replaced with “an obvious nucleated shape” or similar wording as it could be argued that any site could be “definable”, and the word “well” replaced by “long”. This would help tighten the guidance. It is vitally important that artificially created sites tagged onto a building group is not permitted. Alternative wording for paragraph suggested.	Braes of the Carse Conservation Group	Agree this section would benefit from further clarification and strengthening. However, the term ‘nucleated’ (meaning to form around a central area) will not always be appropriate – a slightly more dispersed group, for example, will not necessarily have a ‘centre’ to form around.	Yes Category 1, adding to a group, amended
Support clarification of ribbon development	SNH	Support welcomed	n/a
The proposed five dwelling limit for linear development is too restrictive.	Galbraiths	It is clearly stated that each case will be treated on own merits.	No
Graphic on page 6 should show an un-developed area adjacent to the watercourse in keeping with PKC Flood Risk Guidance and principles of sustainable flood management.	SEPA	Agree	Yes Illustration amended
Category 2 – Infill Sites			
Support	SNH	Support welcomed	n/a
The proposed five dwelling limit for linear development is too restrictive.	Galbraiths	It is clearly stated that each case will be treated on own merits.	No

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
Question the reasoning for not allowing the retention of a field access within an infill plot. This is not an unusual feature in the countryside and could mean farming businesses have to construct a new access.	Galbraiths	<p>The SG requires that for a proposal to be treated as infill development the full extent of the gap should be included. Allowing the retention of a field access means a gap is created in what would otherwise be a continuous line of buildings. Without specifying the width of such a gap there is a risk that this could become too open to interpretation.</p> <p>It is envisaged that in most cases a farmer will either own or have right of access to their field so there shouldn't be a need to construct a new access. If this is not the case then this can be taken into account through the planning application process.</p>	No
Category 3 – New houses in open countryside			
Does not appear to address 'creeping housing development'; larger scale developments may be refused but allowing numerous small applications can cumulatively result in the same number of additional houses.	Portmoak Community Council	If a proposal meets the provisions of Category 3 the fact that it adds to other new development in the area should not automatically render the proposal unacceptable. Each planning application will be assessed on its own merits, taking into account other new development and consented sites in the area.	No

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
<i>Siting Criteria</i>			
'unless otherwise stated' is unclear; there should be greater clarity over the exceptions where the siting criteria do not apply.	RP Planning Ltd	Agree	Yes Siting criteria amended
'surrounding vantage points' should be defined; this differentiates from <u>any</u> view of the site.	RP Planning Ltd	No further definition is considered necessary.	No
Criterion for 'an identifiable site with long established boundaries' should be deleted or reworded; it is unlikely that a countryside site will be defined on all boundaries. Also applies to the second bullet point on page 10. Alternative wording suggested.	RP Planning Ltd	The purpose of this criterion is to avoid a completely open boundary on any side; site boundaries need to be defined by topography / established landscape features to prevent uncontrolled spread of development into open land.	No
Clarity sought over natural as opposed to artificial boundary. Existing mature boundaries will have been put there by humans so could be considered 'artificial'; the future bedding in of landscaping should be considered as 'natural'. Each application should be treated on its own merit rather than a blanket man-made versus natural approach.	Scottish Land & Estates	The issue is whether the boundary has been constructed or planted with the specific intention of 'creating' a site for development. Agree removing the word 'artificially' would help clarify this.	Yes Siting criteria amended
'it does not have detrimental impact on the surrounding landscape' – should be reworded to put the onus on the applicant to show how the proposals can at best make a positive contribution to the landscape or to be in keeping with local landscape character.	SNH	Agree	Yes Siting criteria amended

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
Criteria on page 10 appear inconsistent with those on page 9 and should be deleted.	RP Planning Ltd	It is not considered that there are inconsistencies but acknowledge that there is some repetition in this section which should be removed.	Yes Remove repetition
<i>3.1 Existing Gardens</i>			
Unsympathetic to the guidance for the Council to allow development in a field surrounded by old and established woodland, and to allow partial felling of that woodland to create a road and housing.	Scone and District Community Council; A member of the public	All the comments from these respondents appear to have been made within the context of site H29 Scone North which is within the settlement boundary and therefore the Housing in the Countryside policy and guidance are not applicable.	No
<i>3.2 Houses in areas of Flood Risk</i>			
Support, but if ad-hoc protection measures are in or on the banks of a watercourse the applicant should be encouraged to seek advice from SEPA on the opportunities for restoration and any regulatory requirements.	SEPA	Agree	Yes Section 3.2 amended
If a relocated house needs to comply with all the Siting Criteria there is no incentive to relocate as the identifiable site could be developed anyway. Alternative sites under this section should be more enclosed than the site they are replacing and able to be further enclosed through appropriate landscaping, rather than already being perfect.	Meikleour Trust	The incentive to relocate is to move out of an identified flood risk area. Section 3.2 already states that the new site should be the 'best and nearest alternative' site. No further clarification is considered necessary.	No

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
PKC must take cognisance of and implement this section; this is not the case for site H29.	Scone and District Community Council; A member of the public	All the comments from these respondents appear to have been made within the context of site H29 Scone North which is within the settlement boundary and therefore the Housing in the Countryside policy and guidance are not applicable.	No
<i>3.3 Economic Activity</i>			
Requirement for consideration to be given to the renovation, conversion or redevelopment of existing buildings within the landholding; in many cases the costs of renovation or redevelopment render a scheme unviable. Council should confirm they will accept development viability as a reason for not pursuing this option.	Strutt and Parker	Agree	Yes Text amended
Generally content with wording apart from the requirement for applicants to display their entire landholding. This is disproportionate and unnecessary; applications should be determined on siting and design and applicants will have already demonstrated the site chosen is the best option. The planning authority can request another more suitable location be found without requiring the entire landholding upfront.	Scottish Land & Estates	Applicants <u>may</u> be asked to display their entire landholding. This will only be requested where the case officer is neither able to agree or disagree that the best option has been chosen, or require that a more suitable location is found, without knowing the full extent of the landholding.	No
Houses for farm workers neglects to mention other farm operations which require a constant workforce presence e.g. at harvest.	Scottish Land & Estates	The justification for a new house has to be based on those activities which require an on-site presence all year round.	No

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
Too narrow in its interpretation of 'economic need' – this should also cover the economic viability of proposals.	RP Planning Ltd	It is not clear what point is being made here. If the suggestion is that new housing should be permitted in order to support the economic viability of an existing business, there is already scope for this under other categories of the Policy.	No
In relation to seeking expenses for an independent expert opinion on supporting information for a planning application, to evaluate a business plan and / or a Development Viability Statement, please note that planning authorities may only charge for undertaking their functions where there is an express authority to do so.	Scottish Government	Agree it would be appropriate to reword to instead place the emphasis on the submission of a business appraisal or plan which has been prepared by an independent expert.	Yes Remove reference to charging the applicant for the evaluation of information submitted
Inappropriate for the Council to commission an independent expert opinion with costs to be borne by the applicant. If the submission of an economic or business justification is a policy requirement the Council must be sufficiently resourced to undertake the assessment without further cost to the applicant.	Strutt and Parker		
Issue of reducing carbon footprint through reducing the need to travel has been neglected.	Scottish Land & Estates	This is a valid consideration but only if that person who is commuting is required to do so every day all year round. If this is the case, then it should be possible to justify a new house under this category anyway. If daily commuting is not required then it is not considered that the reduction in carbon footprint is sufficient justification for a building a new house in the countryside which will then	No

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
		require travel, probably by private car, for services / facilities etc.	
Clarity is welcomed but a broader vision and understanding of economic activity in the countryside is needed not only farming.	Errol Estate; Scone Estate	Only one paragraph in 3.3 relates specifically to housing for farm workers. The policy seeks to support all rural business, not just farming. It is important, however, to retain an emphasis on supporting those businesses which are rural in nature, and to make a distinction between those economic activities which have to be located in rural areas and those which could just as easily be located within the settlement boundary.	No
Despite the importance of agriculture as a core economic driver in PKC there is little if any hard policy support for farming use within the adopted LDP. Instead both the policy and SG appear to seek to prevent housing outside existing settlements, mirroring the adopted LDP where priority is given to larger housing proposals. Neither the LDP nor SG differentiate between the desire to avoid sporadic extensions to outlying villages from the fact that many agricultural holdings require its workers to live on the farming unit; there is no sequential test in law for farm workers to have to prove that they must use existing settlements rather than live within the farm. The adopted SG seeks to address this via occupancy restrictions but these can no longer be used. As a result there seems to be a reluctance to allow new houses as there is no longer this 'safety net'. SG should provide detail on the mechanism of proving economic need; if a farmer can prove	Simon Howie Farms	<p>Disagree that there is little support in the LDP or SG for farming. Policy 19 and the SG seek to strike a balance between encouraging sustainable rural developments whilst at the same time protecting the very aspects which make our rural areas special.</p> <p>TAYplan Policy 1 directs the majority of development to the principal settlements and the LDP must comply with this higher level plan.</p> <p>Section 3.3 of category 3 is all about trying to enable new housing in open countryside where this can be justified and where a need has been demonstrated to the satisfaction of the Council</p>	No

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
(presumably via an agricultural consultant) that on-site housing is needed why would PKC dispute this? LDP policy and SG appear more focussed on the visual impact of new houses on existing settlements than on an acceptance that a new house is required to sustain and enhance the countryside through active farming. Many people in smaller settlements are commuters who do not want change. PKC policy and SG need to shift from constraint to enthusiastic support and encouragement reflecting the high level support the farming sector has within the Scottish Government.		(and this is usually by an agricultural consultant or the SAC).	
Issue of the requirement for housing created by the new Private Residential Tenancy (whereby a landlord can no longer get houses back for farm workers) has been neglected.	Scottish Land & Estates	If landlord has chosen to let a property to a non-agricultural tenant (who they then can't evict on the grounds that they want to lease the property to a farm worker) this cannot be a justification for building a new house. Landlords have to take this issue into account and assess the likely future need for farm worker housing on their land before letting to a non-farming tenant, particularly if the property is, on or can reasonably be considered to be associated with, a farm.	No (other than a factual correction to replace 'Short Secure or Assured Tenancy' with 'Private Residential Tenancy')

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
<i>3.4 Houses for Local People</i>			
Welcome this policy and encourage the inclusion of 'succession housing' for farming families to allow retiring farmers to remain on the holding.	Errol Estate; Scone Estate	There is some scope already within the policy, e.g. under category 5, which could potentially allow new housing to be created for a retiring farmer. Whilst the reasons behind the comment are appreciated, the difficulty with allowing an additional house on succession grounds is that the retiring farmer, whilst maybe wishing to stay on the landholding initially, may reach the stage where they want or need to move, often when they are less able to drive or for health reasons. This could result in the new house being sold off, as occupancy cannot be restricted. When the next generation is looking to retire there's then pressure for yet another house.	No
There does not appear to be any pressure on the H29 developers to provide housing for local people in Scone, significantly those on low incomes.	Scone and District Community Council; A member of the public	All the comments from these respondents appear to have been made within the context of site H29 Scone North which is within the settlement boundary and therefore the Housing in the Countryside policy and guidance are not applicable.	No

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
<i>3.5 Houses for Sustainable Living</i>			
Welcome, but paragraph 2 sets an extremely high bar for this kind of development and does not recognise the technological changes that are facilitating more sustainable rural living.	Errol Estate; Scone Estate	Section 3.5 isn't about sustainable living in terms of being able to drive an electric car or work from home but is about opting for a completely different lifestyle approach. If the use of existing renewable technologies is taken as being sufficient to allow a new house (and one which does not comply with any other category of the SG) then there would be little to prevent anyone from building a new house in the countryside, to the potential detriment of what the Policy is seeking to protect.	No
The criterion requiring that proposals go beyond widely available technologies and instead include new elements is far too stringent. The use of new technologies is expensive and may put sustainable living beyond the means of those wishing to try it. It also assumes there will always be something new and suitable to meet this criterion. The use of existing renewable technologies should be sufficient.	Glen Lyon & Loch Tay CC – comments supported by Fearnan Village Association		
The criterion requiring that households are not dependent on car travel elsewhere to meet their basic shopping needs is impractical because many everyday items cannot be produced locally. It is also unnecessary because of modern storage facilities and bulk buying which reduce shopping trips, the availability of supermarket / supplier deliveries, and because electric transport will make the car-dependency argument null and void.	Glen Lyon & Loch Tay CC – comments supported by Fearnan Village Association	The whole point of section 3.5 is to support those who which to embrace an entirely different lifestyle in that they want to be as self-sufficient as practicable, producing all those foodstuffs which it is possible to produce in Scotland. Being able to bulk buy and store and / or use electric vehicles / supermarket deliveries are all things which can all be done living in the built up area. It is, however, accepted that there are some 'basic shopping needs' which cannot be produced here and so the text should be amended accordingly.	Yes Section 3.5 amended

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
Category 4 – Renovation or replacement of houses			
Recommend an introductory section to reinforce sentiment in SG Introduction to harness the potential of redundant traditional buildings.	SNH	Agree, although it is considered more appropriate to add this to the overall 'Brownfield Sites (Categories 4, 5 & 6)' section as it could apply to both categories 4 and 5.	Yes Additional text added to introductory paragraph of the 'Brownfield Sites (Categories 4, 5 & 6)' section
<i>Traditional houses and houses of architectural merit</i>			
Welcome definition of traditional buildings and houses of architectural merit. Recommend that 'every effort to retain them where possible' is strengthened with a presumption against replacement, or where retention is not possible then replacements should retain the vernacular style.	SNH	Agree it would be beneficial to add a general presumption against the replacement of traditional houses. In the case of replacements however, the SG already requires that the design must be of a high quality and appropriate to its setting and surrounding area. Specific reference to the vernacular style is not considered necessary.	Yes Text amended
In relation to seeking expenses for an independent expert opinion on supporting information for a planning application, to evaluate a business plan and / or a Development Viability Statement, please note that planning authorities may only charge for undertaking their functions where there is an express authority to do so.	Scottish Government	Agree to reword to instead place the emphasis on the submission of a Development Viability Statement which has been prepared by an independent expert.	Yes Remove reference to charging the applicant for the evaluation of information submitted

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
Inappropriate for the Council to commission an independent expert option with costs to be borne by the applicant. If the submission of an economic or business justification is a policy requirement the Council must be sufficiently resourced to undertake the assessment without further cost to the applicant.	Strutt and Parker		
Low ceiling heights in traditional buildings should not be a reason to allow their demolition. If the ceiling height does not meet the developers' requirements then the building should not be considered.	Glen Lyon & Loch Tay CC – comments supported by Fearnan Village Association	Where a traditional building is proposed for demolition the Council has the option of requesting a Development Viability Statement from the applicant which demonstrates that all potential options for retaining the building have been explored. No changes are considered necessary.	No
<i>Non-traditional houses</i>			
The benefits of replacing a house of poor quality or design should not be used as a pretext to replace a small house with a significantly larger one.	Glen Lyon & Loch Tay CC – comments supported by Fearnan Village Association	Agree it would be beneficial to add a cross reference to the requirements already listed for the replacement of traditional houses.	Yes Text amended

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
<i>Ruinous houses</i>			
If proposal is for the replacement of an existing ruinous house, conditions i) and iii) should be sufficient – it is already a site and so considering if it meets siting criteria seems unnecessary.	Meikleour Trust	Agree to remove the reference to the siting criteria but it is considered that the rest of criterion ii) is still relevant; how well established the site is can depend on how long the house has been ruinous. It is not simply a case of allowing the building of a new house because there was something there before – there is a need to consider the landscape impact of building a new house in place of a ruin.	Yes Text amended
SG is not clear on how an application would be assessed for the replacement of a fire damaged house which had to be demolished as this would not comply with category 4 or 6.	Galbraiths	Unfortunately the SG can't cover every eventuality and the situation where a house is so badly damaged by fire that it has to immediately be demolished is unlikely to occur very often. However, in this specific set of circumstances, should the owner seek to rebuild within a reasonable timescale (e.g. allowing time for insurance to pay out) then it may be possible to treat this as an exception and still assess the application under Category 4.	No
Category 5 – Conversion or replacement of redundant non-domestic buildings			
Clarification is needed over whether the requirement for full details for demolition proposals also refers to conversion proposals.	Errol Estate; Scone Estate	The requirement for full details relates to proposals which involve the demolition of a traditional building. Agree it would be clearer to move the paragraph to the end of the section.	Yes Paragraph moved

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
More requires to be done to ensure that farm buildings can be retained for agricultural use or utilised for other employment uses as opposed to housing; farming businesses cannot compete with the monetary value offered by developers for housing and this is putting pressure on the future sustainability of agriculture in Perthshire. The purchase of actively used farm buildings with a view to leaving them unused should not qualify the building as redundant. The second definition of redundant in the SG (unsuited to the restructuring needs of the farm) allows too much leeway.	Braes of the Carse Conservation Group	The SG now requires that it is demonstrated that buildings are not only vacant but have been marketed for another employment use for at least a year. Agree, however that it would be appropriate to delete the second definition because in most situations where a business is being restructured, either of the other parts of the definition will apply anyway.	Yes Second definition deleted
If a building is in an obviously poor state of repair, the condition to market it for sale or rent for employment use for at least one year would seem unnecessary.	Meikleour Trust	The marketing requirement is to discourage owners from deliberately allowing a building to deteriorate specifically in order to gain consent for housing. It is acknowledged that, if the condition of the building is very poor, housing may be the only use which would generate sufficient value for conversion. However, in order to prevent the loss of such buildings to housing wherever possible, it is considered reasonable to require the applicant to demonstrate that every effort has been made to find a new employment use first.	No

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
Requirement for marketing for a year does not work well where a building is in the core of the owners land and not in a suitable position to be sold on the open market. This requirement should be removed or qualified to cover this situation.	Errol Estate; Scone Estate	Whilst the concern is understood, ultimately it will be the owner's choice whether to comply with the SG and market the building, or retain and reuse it for an alternative employment use themselves. If the building is converted to housing it is possible that this would be sold on the open market at some point anyway.	No
Paragraph 5 – recommend adding guidance that does not support further applications for non-domestic buildings on the same land for a specified period of time after the development takes place.	SNH	The main consideration is ensuring that traditional non-domestic buildings aren't being lost to housing needlessly. If it can be demonstrated that existing buildings are redundant on the grounds that they are no longer fit for purpose, then it is considered appropriate to allow new non-domestic buildings to be constructed on the same land providing that the full details are provided upfront. Where an application for conversion to housing is approved on the grounds that the building is surplus to requirements, however, the Council would not expect future applications for new buildings associated with the business. It is agreed that this section would benefit from some further clarification on these points.	Yes Category 5 amended

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
In relation to seeking expenses for an independent expert opinion on supporting information for a planning application, to evaluate a business plan and / or a Development Viability Statement, please note that planning authorities may only charge for undertaking their functions where there is an express authority to do so.	Scottish Government	Agree to reword to instead place the emphasis on the submission of a Development Viability Statement which has been prepared by an independent expert.	Yes Remove reference to charging the applicant for the evaluation of information submitted
Sites for housing in the countryside are not generally allocated. SG should therefore clarify that applications in principle will be accepted to establish whether the principle of development is acceptable thus avoiding potentially abortive costs. Thereafter aspects of design can be constrained by condition. This is particularly relevant to steading conversions. The issue is in finding a balance in terms of the cost of producing information e.g. Development Viability Statements. Suggest there is a need for a way in which a middle ground can be reached without having to commit to expensive surveys which may not result in an application e.g. a specific pre-application enquiry fee for the conversion / replacement of traditional non-domestic buildings and complexes.	Errol Estate; Scone Estate	The SG only seeks to remove in principle applications where demolition is proposed. In such cases the siting and design of the new house(s) will be integral to the acceptability of the proposal and so it will not normally be possible to agree to the principle of a new house in isolation. The Council, through the revised SG, has sought to provide further detail and clarity on what will and will not be accepted. In the case of steading conversions, where full or partial demolition is sought it is suggested that the information which would be required for a Development Viability Statement is the same information which the applicant themselves is likely to require to be able to make an informed decision.	No

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
<i>Traditional building complexes(renamed ‘New build associated with conversion’)</i>			
Disagree that traditional building complexes should have to be in an accessible location except where a green belt restriction might be relaxed. This is challenging and no longer appropriate given changes in technology.	Errol Estate; Scone Estate	Disagree. The potential offered by technological changes is acknowledged, but where new houses are being developed on a site these still need to be accessible to certain services and facilities, particularly schools.	No
Cost involved in steading conversions can be prohibitive but there are a range of significant benefits from taking a more flexible approach to steading conversions, particularly in the addition of new build elements: new build can assist in making a scheme viable and in turn creates a means to protect, enhance and conserve rural buildings of merit; economic benefits; additional housing can facilitate the remediation of farmyard contamination, enhancing the environment and reducing health risks; new build elements stimulate projects and allow more budget for conversion works, potentially allowing a higher quality development. Setting a 25% limit on the brownfield area is an arbitrary figure which will adversely affect the quality of development.	Errol Estate; Scone Estate	This section seeks to allow appropriate development on rural brownfield land associated with existing steading complexes, whilst ensuring that the traditional form of the steading is not lost. 25% is considered a reasonable figure to ensure that the character of the original building is retained. <u>In general</u> , no more than 25% should comprise new development – a larger percentage is not therefore precluded where it can be demonstrated that the design, form, layout and context are appropriate.	No
Developing only 25% of a brownfield site, plus affordable housing, landscaping and servicing requirements, is a barrier on developing these sites.	Scottish Land & Estates		

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
A limit of new building dwellings within steading developments should be considered.	Rettie & Co Ltd	Allowing a pre-defined number of new build houses is not considered appropriate; the number of new houses can vary greatly depending on the site and nature of the existing building complex. The existing requirement that generally no more than 25% should comprise new build development is considered the most appropriate approach.	No
When granting permission for steading conversions consideration should be given to enabling phased development to allow early sales / rentals to assist with overall cash flow.	Errol Estate; Scone Estate	This can be considered through the planning application process.	No
Consideration should be given to relaxing or removing affordable housing requirements on steading conversions to increase viability, allowing the provision of much needed housing.	Errol Estate; Scone Estate	There is already scope within the Developer Contributions and Affordable Housing SG to allow for a reduced affordable housing contribution where it can be demonstrated, through a viability statement, that the provision of 25% affordable housing would render the development unviable.	No
<i>Non-traditional non-domestic buildings</i>			
Support clarification that replacement of non-traditional non-domestic buildings with housing is not supported.	SNH	Support welcomed	n/a
Section on 'Non-traditional non-domestic buildings' is far too restrictive. Such buildings often do not lend themselves to conversion or re-use for alternative employment uses because of their condition, construction type or location. They may be on	Montgomery Forgan	First and foremost the emphasis within the Policy is on the conversion of traditional buildings. Such buildings make a significant contribution to the character and quality of the rural area. Treating	Yes Text amended

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
brownfield land which need or would benefit from environmental improvement and new housing is the only means to achieve this. The blanket ban means such sites may be left to deteriorate to the detriment of the environment. It would be more proactive to allow brownfield land containing modern non-domestic buildings to be redeveloped for housing if a significant net environmental improvement can be achieved.		these buildings differently to non-traditional buildings is therefore considered justifiable. It is however agreed that the wording of this section would benefit from further clarification in relation to the creation of a residential use where one did not previously exist.	
Narrow focus on buildings deemed as 'traditional' removes the possibility for appropriate conversion or replacement of non-traditional buildings constructed after the early 1900s. Such buildings can have the same potential for reuse and adaptation to meet housing needs as pre-1900s buildings. If replacement of such buildings with housing is not possible and other uses are not practical / appropriate this could prompt retained dereliction.	Strutt and Parker	Whilst the issue of non-traditional buildings becoming derelict is acknowledged, this has to be balanced against the potential adverse visual impacts of new housing. In many cases non-traditional buildings are not of a design or form which can be readily translated into housing and so the replacement buildings would differ to the original. This weakens the argument that replacements for traditional buildings must be generally faithful to the design, form, siting and materials of the existing buildings to help retain the original character.	
The argument that non-traditional non-domestic buildings should not be redeveloped for housing because this would introduce a residential use which did not previously exist is illogical; this already happens with traditional non-domestic buildings. Question why traditional and non-traditional buildings are being treated differently.	Galbraiths	Category 5 already allows for the development of some new build which may allow scope for the redevelopment of non-traditional buildings where this is associated with the conversion of a traditional building complex.	

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
		Category 6 already allows for redevelopment where brownfield land has been so degraded by a former use that it would be better in environmental terms to allow the site to be redeveloped for housing.	
Category 6 – Development on Rural Brownfield Land			
Definition of rural brownfield land is at odds with the presumption in favour of redeveloping brownfield land in SPP; the SPP does not require demonstration of environmental degradation. This unduly restricts development in the countryside and could prejudice the Council's ability to achieve the windfall element of the housing land supply. Policy should be more flexible making it clear that in all cases siting, design and landscape impact will be the primary consideration.	Strutt and Parker	In line with SPP, the SG presumes in favour of the redevelopment of brownfield land over greenfield, covering both sites which still contain buildings (Categories 4 & 5) and sites where buildings have been removed (Category 6). The Examination Reporter for LDP1 concluded that the Council was entitled to define brownfield land in rural areas on a different basis to that in other areas, and this was reiterated by the Reporter for LDP2 with the latter noting that there has been no change to legislation or national planning policy on the issue since the original determination.	No
Definition of rural brownfield land is too restrictive and is inconsistent with the accepted definition of brownfield land in SPP.	Galbraiths	The windfall element of the overall housing land requirement calculation is a very conservative 10% which has been regularly exceeded in past years – it is considered therefore that not allowing the development of inappropriate rural brownfield sites will not impact on the Council's ability to meet the housing land requirement.	

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
'Significant environmental improvement' needs to be defined; as written the guidance is open to subjective interpretation and judgement.	Galbraiths	This category has evolved since it was first included in the 2005 policy. In the 2009 revision consideration was given to removing the category altogether as it was considered open to too generous an interpretation in relation to what was meant by 'significant environmental improvement', and had allowed land associated with steadings and farmyards to be redeveloped resulting in large scale suburban type developments in the countryside which had been met with significant public opposition. Whilst more recent revisions of the SG have sought to provide further clarity, the issue of what is meant by significant environmental improvement is still a source of controversy. It is therefore proposed to remove the term altogether and instead reorder this section and provide further clarity as to when the redevelopment of a brownfield site will be supported.	Yes Text amended and reordered
There are many reasons why land and structures can fall into disrepair and to blight such sites is contrary to the spirit of brownfield and the presumption in favour of developing brownfield over greenfield. Unclear how this could be applied in the absence of any threshold or measure of degradation or damage. The first two sentences of paragraph 2 'Many sites...fall into disrepair' should therefore be deleted.	Strutt and Parker		
Current policy is unclear as to what is eligible for development as brownfield; sites are only classed as brownfield once buildings are removed but demolition costs can be prohibitive on a speculative basis.	Rettie & Co. Ltd	The inclusion of introductory paragraphs preceding Categories 4, 5 & 6 clarify that if buildings remain on a site then it will be considered under Category 4 or 5 rather than 6. No further change is considered necessary.	No

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
Development could be stymied because of the need to undertake expensive contaminated land investigations without knowing that a planning application will be approved. The pre-application enquiry process could facilitate an approach whereby a proportionate amount of information is provided.	Errol Estate; Scone Estate	The concerns are understood but where a proposal relies on the remediation of contaminated land as a justification for development, without the contaminated land investigations the acceptability of the proposal cannot be assessed. It is suggested that this information would also be required by the applicant themselves in order to make an informed decision as to whether to proceed to work up proposals for a site.	No
Suggest adding that development should take place on the footprint of the brownfield land to ensure this land is used for re-development.	SNH	It is not entirely clear what is meant by this comment. It is assumed that the respondent feels that development should be restricted to the footprint of the former buildings, however, where contamination is an issue this will not necessarily be restricted to those parts of the site where buildings previously stood. It is not therefore considered necessary or appropriate to restrict development in this way; the most important consideration will be that any contamination is dealt with and the For All Proposals criteria are met.	No

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
Restricting new housing proposals to 5 units is an arbitrary number which could be replaced with requirements for development to be of a suitable scale in relation to the extent of the brownfield land and level of landscape containment.	Errol Estate; Scone Estate	Limiting proposals to 5 units is intended to give a clear indication as to the scale of development which will be accepted. Whilst it is acknowledged that some large rural brownfield sites may be able to accommodate a greater number, allowing more than 5 new build houses risks the development becoming more urban than rural in nature. Furthermore there is already provision within the guidance for a greater number under certain circumstances.	No
Does not appear to address 'creeping housing development'; larger scale developments may be refused but allowing numerous small applications can cumulatively result in the same number of additional houses.	Portmoak Community Council	If a proposal meets the provisions of category 6 the fact that it adds to other new development in an area should not automatically render the proposal unacceptable. Each planning application must be assessed on its own merits; the impact of other consented sites in the surrounding area can be taken into account through the planning application process.	No
Other comments on content			
SG must take cognisance of growing trends towards homeworking and electric vehicles. It is clear that previous assumptions that housing in the countryside is fundamentally unsustainable must be updated to reflect new technology and living choices.	Errol Estate; Scone Estate	As discussed under 3.5 and 5 above, the potential offered by technological changes is acknowledged but if these arguments are taken as sufficient justification then there would be little to prevent	No

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
SG is overly restrictive. Rural living will become more sustainable with electric vehicles, home and remote working etc. More remote rural areas need to be able to provide opportunities to sustain and grow populations to maintain and enhance rural facilities. There should therefore be more opportunities to use brownfield and / or derelict land for housing.	Montgomery Forgan	<p>anyone from building a new house in the countryside, to the potential detriment of what the Policy is seeking to protect.</p> <p>Other categories of the SG, for example building groups and infill, already allow opportunities for the sustainable growth of small rural settlements to help support rural facilities and services (which are most likely to be located in settlements). The development of rural brownfield land is discussed under Category 6 above.</p>	
SG should allow for settlement edge development for small scale housing and for new build housing associated with conversion / replacement under category 5. Many settlements do not have housing allocations; windfall development on settlement edges that brings significant visual and placemaking improvements should be encouraged. Not allowing the development of logical infill settlement edge sites because they are not allocated or permissible under policy 19 removes the possibility for sustainable development close to settlements.	Errol Estate; Scone Estate	Policy 6: Settlement Boundaries sets out the circumstances under which development directly adjoining a settlement boundary will be permitted. The change suggested would bring the SG into direct conflict with Policy 6 and cannot therefore be supported.	No
More weight should be given to economic benefits within planning policy for new housing developments in the countryside. SG as it stands will likely result in limited rural development due to costs involved. Crucial that planning authorities take an enabling, flexible approach.	Scottish Land & Estates	Previous versions of the SG – which took a more relaxed approach – resulted in some developments which met with significant public opposition. As stated in the opening paragraph of the SG, the Council’s objective is to strike a balance between	No

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
Additional clarity on many policy points is appreciated and overall the new SG will be very helpful, but question whether it reflects the Government's aspirations for rural areas and the role that rural areas already play in our economies. A more dynamic vision for rural areas and allowing greater flexibility in development opportunities should be considered to allow the rural economy to thrive.	Errol Estate; Scone Estate	<p>protecting the landscape of Perth & Kinross and encouraging appropriate housing development. The SG has been revised numerous times since it was first introduced in 2005. The present guidance is considered to strike an appropriate balance between protection and encouragement.</p> <p>Disagree that the SG will likely result in limited rural development; a considerable number of planning applications are submitted every year for housing in the countryside.</p>	

Comments on Airfield Safeguarding draft supplementary guidance

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
General observations seeking changes			
Why no mention of Perth airport at Scone?	Councillor	<p>Our guidance has been drafted to cover safeguarding only at aerodromes that are not already licenced (these are the smaller, non-passenger ones); however Perth Airport is a licenced aerodrome and this means it has already adopted its own safeguarding measures, as required by its licence.</p> <p>There is no need for the Council to duplicate existing safeguarding measures for licenced aerodromes.</p>	None
General comments that do not seek any changes			
Motorised hang gliders are considered a noisy and nosy pest where I live. Questions whether these are licensed by the Council	A Member of the public (SG044)	The Council has no plans to introduce a licensing scheme to deal with noise from motorised aircraft because this is already covered elsewhere by statutory powers.	None
Support for the guidance as published	General Aviation Awareness Council (SG045)	The General Aviation Awareness Council is an industry body representing general and light aviation (organisations such as aerodrome operators, flying training organisations, and other bodies and individuals). Its aims include the promotion of a co-ordinated approach to major issues affecting General Aviation activities in the UK.	None

Comments on delivering Zero Waste draft supplementary guidance

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
5. Waste management infrastructure in Perth and Kinross			
The recycling point identified at Scone on the map on page 12 has been removed without prior agreement or consultation in April 2019. A recycling point like the one removed is vital in a community the size of Scone.	A member of the public (SG042)	No change to the guidance was needed because after a search for a new location in the village, Scone is served by a recycling point at David Douglas Avenue and a glass recycling point at Sandy Road.	None
There is no recycling facility in Blairingone so could the waste collection vehicle be modified with compartments to accept all waste including recycling? Making special trips to recycling centres is neither convenient nor sustainable.	A member of the public (SG043)	This comment was passed to the recycling team in the Council that deals with operational matters.	None
There are no objectives and no guidance as to how to deal with illegal waste streams (such as disposal of end of life vehicles and equipment on rural land, disposal of waste beside the road, and how to quickly and effectively deal with such illegal waste streams)	A member of the public (SG046)	The Council has no plans to introduce this to the guidance because this is already covered elsewhere by statutory powers.	None
General comments that do not seek any changes			
The introduction of beverage container deposit scheme and the associated return to retailer system will reduce littering but how will diverting higher value containers back to retail fit with and affect PKC's recycling system	A member of the public (SG046)	The deposit scheme is outwith the scope of this guidance.	None

Comment	Received from	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
In terms of restoration and aftercare of waste management sites (p11), we welcome the inclusion of the statement that "It is important that this considers the enhancement and connectivity of existing habitats as well as the creation of new habitats."	SNH (SG047)	No change to the guidance is proposed.	None

Comments on Developer contributions draft supplementary guidance

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant Section of Guidance			
1. General Comments			
No Comments	Coal Authority	The response is noted.	No change proposed by the Council.
No Comments	Historic Environment Scotland	The response is noted.	No change proposed by the Council.
The draft SG has been issued in connection with Local Development Plan Policy 5 (Infrastructure Contributions) and Policy 20 (Affordable Housing). The draft SG should be reviewed to make sure it complies with the relevant regulations before adoption.	RP Planning/ Ristol	The Guidance has been assessed and an independent Legal review carried out. The Guidance complies with all relevant regulations.	No change proposed by the Council.
The Guidance should include a commitment to consult Network rail where development may impact on the rail network and may require rail network improvements.	Network Rail	Network Rail is currently a statutory consultee where a planning application is deemed to impact on the rail network. Where rail network improvements are required as a result of future development this should be identified by Network Rail through this planning application consultation process or through the development of the Local Development Plan.	No change proposed by the Council.
The Council should produce annual report on developer contributions.	RP Planning/ Ristol	Annual reports on the level of contributions collected are produced annually and published on the Council website: www.pkc.gov.uk/developercontributions	No change proposed by the Council.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant Section of Guidance			
Provide further clarification on whether the costs are indexed or fixed.	Scone Estates	The contribution levels set out in the Guidance are fixed. Where a Planning obligation is entered into which phases the payments then these may be index linked as set out in Para 3.20.	No change proposed by the Council.
An overall cap on contribution level should be set by the District Valuer for proposals which bring redundant/vacant houses back into use.	Scone Estates	The level of contributions being sought are based on mitigating the impact of new development on that infrastructure. This contribution is usually secured from the uplift in value of land achieved through grant of planning consent, although it is recognised this is not always the case for proposals to bring vacant/redundant buildings back into use. If the contributions create viability issues, then the applicant has the option to submit a Development Viability Statement to demonstrate why the full level of contributions cannot be paid.	No change proposed by the Council.
The Guidance does not state any specific requirement for development in or near an opportunity area to support (either through contributions or direct intervention) one of the opportunities identified. It would make the Guidance more effective if it stated requirements of development rather than an aspirational wish list.	TACTRAN	In line with the Green Infrastructure Guidance developers will have to demonstrate that they considered the opportunities within and around the site and developed a proposal which maximises the potential benefits of Green Infrastructure to people and wildlife. The planning application stage will provide an opportunity to determine the ideal form of Green Infrastructure delivery in light of the analysis provided in this guidance and the detailed site work and studies undertaken by the developer.	No change proposed by the Council.
Identify key green infrastructure in the guidance and strengthen the mechanism for securing their delivery through developer contributions.	SNH	Where requirements are identified and where appropriate these may be secured as contributions in line with Circular 3/2012 and Local Development Plan Policy 5: Infrastructure Contributions.	

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant Section of Guidance			
The Guidance should reference other guidance on the design and implementation of active travel infrastructure.	TACTRAN	The Council does not have their own best practice guidance on the implementation of active travel infrastructure. From the list of guidance recommended by TACTRAN, Transport Scotland's Cycling by Design has been referred to as an advisory document in the past however this will soon be reviewed. The updated Guidance is expected to provide a better baseline for designing for active travel and once completed can be referred in planning guidance.	No change proposed by the Council.
Tarmac welcome the certainty to Developer Contributions outlined within the Guidance and consider that this certainty is necessary where there are to be land transactions prior to the development schemes being designed or sites being allocated within the Local Development Plan 2. This will allow developers to purchase land at a price which ensures that all contributions are taken into account.	Tarmac	The response is noted.	No change proposed by the Council.
2. Introduction			
Para 1.7 Review this paragraph so that it follows the wording of Policy 5 of Local Development Plan 2019, legislation and Government Circular 3/2012.	RP Planning/ Ristol	While this paragraph is providing a description of the general content of the Guidance it is agreed that it could better reflect the wording of Local Development Plan Policy 5: Infrastructure Contributions which in turn meets the requirements of Circular 3/2012 and TAY Plan Policy 6: Developer Contributions.	Amend Para 1.7 to read: 'This Guidance concentrates on the delivery of developer contributions to provide a means to secure contributions towards the provision of on-site facilities necessary in the interests of comprehensive planning, and/or, the provision, or improvement of, off-site facilities and infrastructure where existing

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant Section of Guidance			
			facilities or infrastructure will be placed under additional pressure. This Guidance also provides advice and information on the application of the affordable housing policy.'
Para 1.9 The National Park has published developer contribution guidance which covers education. The Pupil Product Ratio used differs from PKC i.e. 0.4 for primary school as opposed to 0.27 used by Perth & Kinross Council so the contribution rate would differ if applied. Suggest revised wording.	Loch Lomond & Trossachs National Park	The principle of the revised wording is accepted but will be amended to better fit within the context of the Guidance.	Amend Para 1.9 to read: 'The statutory development plans within the Cairngorms National Park and the Loch Lomond and Trossachs National Park comprise their own Local Development Plans and associated Supplementary Guidance. These documents are prepared by the relevant National Park Authority and define the items towards which the developer contribution will be sought within the Perth & Kinross area of each National Park. While Perth & Kinross Council is responsible for providing services including education in these areas the relevant National Park's Guidance provides the developer contribution requirements for determining proposals in the National Park towards primary education.'
3. Implementation			
Para 3.2 Supportive of the bullet at paragraph 3.2, but consider that there is a typo, which is "the" before "each".	Scone Estates	The proposed amendment is accepted.	Amend Para 3.2 to remove 'the' before 'each' in the second bullet.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant Section of Guidance			
Para 3.3 Exempt all proposals which bring redundant/vacant properties back into use from developer contributions.	Scone Estates	The Guidance sets out that where a property has paid Council Tax in the 7-year period prior to the registration of a planning application to bring it back into use then it would be exempt. The 7-year period is set out as this is the timescale for a child to pass through primary school. To put in place a blanket exemption could mean that buildings which have been vacant for decades could be brought back into use without proper mitigation being secured. Where the application of the Guidance to redundant/vacant properties would impact on the viability of bringing them back into use then the applicant has the option of submitting a Development Viability Assessment.	No change proposed by the Council.
Para 3.15 Further flexibility to reduce the amount of developer contributions should be provided in instances where no recent land transaction has taken place. Add the following: 'It is acknowledged that, in some cases, there may be abnormal development cost which were unknown at the time of the site was purchased <u>or when sites were allocated for development within the Local Plan. It is also acknowledged that some sites have significant abnormal costs associated with them due to historic land uses.</u>	Tarmac	Where a site has not been recently sold then any Development Viability Assessment would look at the Market Value based on its current use. While the principle of amendment is agreed with the suggested revised wording is not accepted. Under Para 3.16 the first bullet point to be amended to read 'Information of land values paid for the site or where no recent land transaction has taken place the Market Value (with supporting evidence and assumptions made);'.	Amend Para 3.16 to 'Information of land values paid for the site or where no recent land transaction has taken place the Market Value (with supporting evidence and assumptions made);'.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant Section of Guidance			
Abnormal costs should be reflected in the purchase price of land and in this respect, the developer will be asked to demonstrate abnormal costs were not known at the time the site was purchased. <u>Where no recent land transaction has taken place Market Value as agreed by the District Valuer or agreed valuation surveyor for the site should be taken into account in any viability assessment.'</u>			
Para 3.6 Modify the Guidance to explain how the Guidance would apply to applications to modify or discharge a planning obligation and a section 42 application to vary a condition, where the original developer contribution was secured under the previous Supplementary Guidance on Developer Contributions.	RP Planning/ Ristol	It is acknowledged that further clarification is required.	Amend Para 3.6 and add the following to the end 'Where an application is made to modify or discharge a planning obligation or a section 42 application to vary a condition, where the Core Development remains unchanged then any revised Guidance introduced since the original grant of planning consent will not normally be applied but each case will be determined on its own merits.'
Para 3.7 states that in the case of large and/or complex developments contributions would be tailored to the particular scheme. This is supported.	RP Planning/ Ristol	The supporting comments are noted.	No change proposed by the Council.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant Section of Guidance			
Para 3.9 The draft Guidance focuses almost solely on the use of Section 75 Agreements. In accordance with Circular 3/2012 (paragraph 15), the planning authority should consider a sequence of other options before using a planning obligation. The Guidance should provide guidance on all these mechanisms, and where they might be appropriate.	RP Planning/ Ristol	It is not considered necessary to repeat the requirements of Circular 3/2012 within the Guidance. But for Clarity it is agreed that other mechanisms for securing contributions may be appropriate in certain circumstances, although the general approach for securing delayed payments will be through the use of a planning obligation.	Amend para 3.9 to read: 'Delayed payment of contributions and affordable housing may be secured through a range of mechanisms as defined in Circular 3/2012 but will normally be by means of a Section 75 Planning Obligation between the Council, the landowner and any other relevant person(s).'
Para 3.11 – 3.12 The Guidance should consider the use of suspensive conditions or provisions in planning obligations to deal with off-site provision of infrastructure.	RP Planning/ Ristol	The Guidance does not discount the use of suspensive conditions or provisions in planning obligations to secure off-site provisions of infrastructure. In line with Para 3.20 of the Guidance the Council will enter into discussions with the applicant to secure the necessary delivery of infrastructure or contributions through the most appropriate mechanism.	No change proposed by the Council.
Para 3.15 – 3.17 The Guidance should set out a commitment to encourage early engagement between the council and developers where payment of all required contributions renders a development financially unviable.	RP Planning/ Ristol	Para 3.16 identifies that a Development Viability Statement should be submitted at the earliest opportunity. Under Policy 23: Delivery of Development Sites for all Local Development Plan development sites and windfall sites of 10+ units the applicant is required to produce a Delivery Strategy which should identify any concerns relating to site deliverability including viability. The Council is committed to engaging with the development industry to support appropriate development and the Guidance as it stands allows for early engagement where viability is identified as a concern.	No change proposed by the Council.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant Section of Guidance			
Para 3.15 – 3.17 Unknown costs from key infrastructure agencies can impact on site viability. There should be joint Council-landowner/developer buy-in at a site from an early stage and support from the Council to work with key infrastructure providers to establish costs at an early stage to allow for assessment of viability. If not, then assumptions based on comparable evidence should be used in assessing viability.	Scone Estates	Para 3.16 identifies that a Development Viability Statement should be submitted at the earliest opportunity. Under Policy 23: Delivery of Development Sites for all Local Development Plan development sites and windfall sites of 10+ units the applicant is required to produce a Delivery Strategy which should identify any concerns relating to site deliverability including viability. The Council is committed to engaging with the development industry and key stakeholders in order to deliver appropriate development. The assessment of viability will be undertaken independently by a third-party advisor at which point it may be appropriate to use assumptions if figures are not yet established. The Guidance as it stands will support this and no modification is required.	No change proposed by the Council.
Para 3.15 – 3.17 Where pre-application advice is sought on projects that involve enabling development and building surveying work will be required. The Council should look favourably upon such projects and/or give firm advice on the likelihood of planning consent being granted or not- this avoids significant up-front cost at risk.	Scone Estates	The Council pre-application advice will be given at officer level only and cannot guarantee whether an application will ultimately be successful. It will provide an overview of relevant policies and guidance, identify where there is need for specialist input and flag up where a proposal could be unacceptable in planning terms. It is up to applicants to progress matters at their own risk based on any advice provided.	No change proposed by the Council.
Para 3.18 - 3.19 The Community Council welcomes the arrangement for accountability.	Portmoak Community Council	The supporting comments are noted.	No change proposed by the Council.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant Section of Guidance			
Para 3.18 – 3.19 The Guidance should require the collected contributions to be spent within an agreed period of time.	RP Planning/ Ristol	Para 3.19 sets out the timescales whereby collected contributions are to be used. Individual contributions not covered by the Guidance will have the timescale for use determined on an individual basis.	No change proposed by the Council.
Para 3.18 – 3.19 The Guidance should set out that unspent developer contributions should be refunded at the end of the agreed period of time from when the respective payment was made, and not the date of the last payment.	RP Planning/ Ristol	Para 3.19 sets out the timescale for the reclaim of unspent contributions. The cost of an infrastructure project may require all the secured contributions and the payments may be phased as the development progresses. If the project stalls for a period, the proposed approach would require the return of unspent contributions even though a sufficient level was not collected to allow the delivery of the infrastructure. If the contributions are returned at this point and the development progresses in the future, then necessary infrastructure would not be delivered. To remove this issue the Council holds onto the funds until the development is completed to allow for the delivery of the necessary infrastructure.	No change proposed by the Council.
Para 3.18 – 3.19 The SG should also acknowledge that refunds would add a suitable amount of interest.	RP Planning/ Ristol	Para 3.19 covers this issue.	No change proposed by the Council.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant Section of Guidance			
Para 3.18 – 3.19 Add the following <i>‘Developers will be able to seek a refund of their payments if the Council has not spent the contributions within a specified time period. Generally, the timescale for the refund of contributions will be from the date of the respective payment. The timescale will be determined by the particular circumstances of a development and the requirement for the developer contributions. Reasonable interest would be added to the refund of contributions.’</i>	RP Planning/ Ristol	It is considered that Para 3.19 covers this issue sufficiently. The suggested wording is not supported.	No change proposed by the Council.
Para 3.20 Provide further guidance and circumstances on where staged or phased payments would be acceptable.	RP Planning/ Ristol	Paragraph 3.20 sets out that where a Planning obligation is entered into then phased payments will be considered through joint discussions between the applicant and the Council. The phasing of payments will take account of the individual development requirements. It is not considered that further guidance is required.	No change proposed by the Council.
Para 3.20 The flexible approach to applying guidance is supported, especially in terms of the potential phasing of payments.	Network Rail	The supporting comments are noted.	No change proposed by the Council.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant Section of Guidance			
4. Primary Education and New Housing			
Para 4.4 The Council to provide further information on the expected primary school capacity pressures arising over the plan period.	RP Planning/ Ristol	Through the development of the Local Development Plan the Council has taken account of projected levels of development and the primary school infrastructure requirements necessary to support it. Appendix 1 identifies those schools which are projected to require additional capacity to support future levels of development as a result of Local Development Plan allocations. It is not expected that this list of schools will change significantly but it will be reviewed annually and may require to be updated if levels of development do not progress as expected or where windfall sites come forward.	No change proposed by the Council.
Para 4.4 Justification for the use of 80% operating capacity threshold (for primary schools).	RP Planning/ Ristol	At 80% some but not all of the primary streams are full or approaching it and this ability to accommodate children of any age to classes will be compromised. 80% capacity allows sufficient space to reorder classes if the age profile of the school roll changes, allows some placing requests to be accommodated and tries to ensure that children moving into a catchment area during an academic year can be accommodated. There is also a need for time to consider impact, plan, seek approval for any adjustments to the capital plan, design and build the accommodation whilst minimising disruption to the education of existing children at the school – there are specific times of the year when this is more suitable than others.	No change proposed by the Council.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant Section of Guidance			
Para 4.4 The 80% capacity figure should be increased to 90% for the 5 out of the previous 7 years period. The requirement for proposed development, extant planning permissions and Local Development Plan allocations resulting in 100% or above total capacity operation of the Primary School should remain.	Scone Estates	The 80% capacity is based on optimising the use of the school infrastructure and forms the basis for future education planning. No justification has been presented as to why a 90% figure would be more appropriate.	No change proposed by the Council.
Para 4.4 The monitoring of 'Placement Requested' should be undertaken.	Scone Estates	Legislation requires that Local Authorities accept placing requests where capacity is available. School estate planning takes account of this demand and monitors it. Spaces are reserved for placing requests, but this does not impact on the school capacity figures in terms of calculating the school capacity for applying contributions.	No change proposed by the Council.
Para 4.4 The potential for school catchment reviews should be considered as an option rather than the payment of contributions.	Scone Estates	Catchment reviews can take a significant period of time to undertake the statutory consultation period. Any catchment review is required to show an educational benefit and to accommodate additional house building would not be a sufficient justification.	No change proposed by the Council.
Para 4.6 Guidance on the effect on education contributions where a planning application would provide land for primary and / or secondary school development should be provided.	RP Planning/ Ristol	The Local Development Plan site allocations identifies where land for primary or secondary school provision would be required within new development sites. The securing of land will be agreed with the applicant on an individual basis. The primary education contribution level does not include land so the provision of land on a site will not change the contribution requirement.	No change proposed by the Council.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant Section of Guidance			
Para 4.12 Further justification of assumptions regarding the average number of children per household (pupil product ratio) and average cost of creating additional primary school capacity should be provided.	RP Planning/ Ristol	In 2009 the Council published a report setting out the background calculation supporting the Pupil Product Ratio of 0.27 pupils per dwellinghouse and the cost per pupil for additional school capacity. These reports underpinned the Primary Education Contribution level. Through the review of the Guidance these reports have been reviewed and updated where appropriate. A copy of each report can be made available upon request.	No change proposed by the Council.
5. Auchterarder A9 Junction Improvements			
Para 5.5 Details of the thresholds for the requirement for a transport assessment should be set out.	TACTRAN	A Transport Assessment will be required when a development has a significant transport implications. Indicative criteria regarding transport implications are given in Paras. 3.10 – 3.21 and Table 3.1 of Transport Assessment Guidance published by Transport Scotland. It is not considered necessary to duplicate this information.	No change proposed by the Council.
Para 5.7 Clarify that a transport assessment should look at the full impact on the road network and not just road safety.	TACTRAN	The junction improvements on the A9 at Auchterarder have been identified as a requirement by Transport Scotland on the basis of safety and not road capacity. As such while a Transport Assessment would look at all aspects of the development on the road network the issue of safety is the key driver for supporting any development in relation to the A9 junction improvements.	No change proposed by the Council.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant Section of Guidance			
Para 5.8 Further details of what the package of measures that the developer contributions will contribute to should be provided.	TACTRAN	The A9 junction improvements will be delivered by the Development consortium of Stewart Milne Homes and Muir Homes in relation to the Auchterarder Expansion Area and planning consent under ref: 08/01133/IPM. Details of the Development Framework and the junction improvements can be found on the Council website: https://www.pkc.gov.uk/article/15045/Development-briefs .	No change proposed by the Council.
6. Transport Infrastructure			
We are in agreement with the Councils draft guidance on contributions to be made on transport infrastructure.	Deloitte LLP on behalf of Universities Superannuation Scheme Limited	The supporting comments are noted.	No change proposed by the Council.
The current Guidance again notes that developer contributions will solely be used for the Cross Tay Link Road and the A9/A85 Crieff Road junction improvements with no funding of additional infrastructure or transport interventions, including active travel or public transport. Contributions should be available to bring forward other elements of the Transport Package required to mitigate the transport implications of development.	TACTRAN	The Guidance secures contributions towards a package of measures which have been costed and have a committed delivery timescale. In line with Circular 3/2012 the Council is unable to secure contributions where there is no direct link between the development and the proposed infrastructure. Local Development Plan Policy 5: Infrastructure Contributions allows for the securing contributions from new developments where infrastructure is placed under additional pressure, this will include additional transport interventions such as active travel and public transport where a direct impact is established.	No change proposed by the Council.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant Section of Guidance			
The Guidance should include a requirement for Transport Assessments to take cognisance of impacts to existing rail infrastructure to allow any necessary developer contributions towards rail to be calculated.	Network Rail	The Transport Assessment Guidance produced by Transport Scotland provides guidance on the criteria and scope of the requirements of a Transport Assessment (TA) including the assessment of Sustainable Transport Provision and Public Transport Impacts. The Scoping Report produced in advance of completing the TA will provide an opportunity for the Local Authority to identify any specific areas of likely impact on rail infrastructure. As no specific projects in relation to rail infrastructure within Perth & Kinross which are the result of Local Development Plan have been identified to date it is not considered necessary to include the suggested requirement. If specific requirements are identified, then these can be addressed through the relevant policy framework.	No change proposed by the Council.
Section 6 should be amended to exempt operational railway works from contributing towards Transport Infrastructure. Para 5.5 of the Guidance sets out a blanket exemption for non-residential development if it is considered to reduce the need to travel and would cover operational railway works.	Network Rail	The basis for the A9 Junction Contribution and the Transport Infrastructure Contributions are different. The A9 Junction is based on junction safety being the key driver for the necessary junction improvements. The Transport Infrastructure contribution relates to road network capacity and the requirement for a developer contribution is to mitigate any adverse impact on infrastructure, services and amenities brought about by development. If a development is proposed by Network Rail which would impact on infrastructure, services or amenities then the development would be assessed on an individual basis. Proposal required for an operational nature will generally be exempt from any contribution	No change proposed by the Council.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant Section of Guidance			
		requirement. Modifying the Guidance to provide a blanket exemption for Network Rail is not considered appropriate.	
Para 6.2 Should include that the CTRL and A9/A85 Junction are commitments within the Tay City Deal and Scottish Government deal to deliver the CTRL.	Transport Scotland	The A9/A85 Junction and the CTRL do not form part of the Tay Cities Deal. The CTRL is being part funded through a separate agreement between Perth & Kinross Council and the Scottish Government. The Action Programme should include reference to this funding arrangement.	No change proposed by the Council.
Para 6.3 Further justification is required for the contribution level being calculated on the basis of 50% of the total costs for the CTRL and the A9/A85 improvements.	RP Planning/ Ristol	SYSTRA carried out traffic modelling work looking at the impact of the proposed development in the current and new Local Development Plan. This report established that this new development would have an additional 50% impact on the road network. This report can be made available upon request.	No change proposed by the Council.
Para 6.4 Network Rail is a publicly funded organisation it would not be reasonable to require it to fund rail improvements necessitated by commercial development. The Guidance should specifically name 'rail infrastructure' as an area where contributions can be collected	Network Rail	Where a specific project is identified in relation to improvements required to rail infrastructure as a direct result of new development then where the Tests of Circular 3/2012 are met a contribution may be secured. The Guidance will be updated to reflect this.	Amend Para 6.4 to include 'for work to the strategic transport network, including rail infrastructure, for example'
Para 6.4 Further information is required regarding developer contributions towards the strategic transport network (method of calculation, amount, type of project etc.) other than for CTRL and the A9/A85 improvements.	RP Planning/ Ristol	The requirement for contributions towards the strategic transport network will be identified and determined by Transport Scotland in consultation with the Council. These will be determined on an individual basis and will not form part of this Guidance.	No change proposed by the Council.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant Section of Guidance			
Para 6.4 Further detail should be included in the expected assessment methodology that will be used to determine cumulative impact to the transport networks (all modes).	TACTRAN	Transport Assessments submitted with relevant planning applications will be used as the basis for calculating any site-specific transport contribution by Perth & Kinross in considering the proposal. Strategic infrastructure contributions based on the cumulative impact will be determined by the Strategic Transport Authorities such as Transport Scotland or Network Rail based on their own methodologies.	No change proposed by the Council.
Para 6.5 Further detail and justification for the basis of the Transport Contribution boundary should be provided.	RP Planning/ Ristol TACTRAN	The boundary is based on the percentage of trips likely to be made from a settlement to Perth. This data stems from the Census 2011 travel to work data. In order to ensure that settlements can be shown to have a discernible impact on the Perth Road infrastructure the contribution boundary only includes settlements which are identified to have a percentage of trips to Perth of 12% or more. Settlements which fall below this threshold will be exempt. The 12% figure has been identified as the majority of the main settlements which fall above this level, are out with the Perth Housing Market Area or have a significantly lower percentage, such as Longforgan which has a percentage of trips of 3%. The contributions are split into two levels - the full contribution rate and the reduced contribution rate. The reduced rate which is a 25% reduction in the contribution level will apply to settlements with a percentage of trips of 12% - 19%. Settlements with a percentage of trips of more than 19% or above will fall under the full contribution rate.	No change proposed by the Council.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant Section of Guidance			
Para 6.7 gives an exemption to 'employment proposals' on brownfield sites. Clarity should be provided on the definition of the 'Employment Use Category' and whether this includes Network rail proposals.	Network Rail	Employment Land Use fall under the Town and Country Planning (Use Classes) (Scotland) Order 1997 categories Class4- Business, Class 5 – General Industrial & Class 6- Storage or Distribution. If a proposal by Network Rail falls under these Use Class, then it would fall under the Employment Use category. If not, it would be considered on an individual basis.	No change proposed by the Council.
Para 6.8 to Clarify what areas are defined as 'Non-Trading' Space and 'Back of House Functions' and seek to remove the Transport Infrastructure contribution requirement from 'Back of House Functions'	Deloitte LLP on behalf of Universities Superannuation Scheme Limited	The Retail land use contribution rate will only apply to functional trading retail floorspace. Back of House functions would fall under the non-trading floorspace. Back of House functions space supports the operation on the Retail floorspace and it is appropriate that an appropriate contribution is secured.	Amend Para 6.8 to include 'Non-trading and Back of House functions space will be calculated on the employment use category.'
Para 6.11 Clarify paragraph to determine whether operational railway improvements would be a specific council objective.	Network Rail	The Council will support necessary Operational improvements where the relevant policy framework is met. Proposal by Network Rail required for an operational nature will generally be exempt from any contribution requirement. If a development is proposed by Network Rail which would impact on infrastructure, services or amenities then the development would be assessed on an individual basis.	No change proposed by the Council.
Para 6.11 The potential exemption or reduction in contributions in relation to proposals which support Council objectives but where it would not be viable due to the application of the Guidance is welcomed and supported.	RP Planning/ Ristol	The supporting comments are noted.	No change proposed by the Council.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant Section of Guidance			
Para 6.13 Revision to the amount of contribution where a contribution of land is made towards the development of the CTLR should apply equally to other strategic transport infrastructure.	RP Planning/ Ristol	The requirement for contributions towards the strategic transport network will be identified and determined by Transport Scotland in consultation with the Council. These will be determined on an individual basis and where appropriate may include a revision in level based on the provision of land. This requirement will not be included within this Guidance.	No change proposed by the Council.
Para 6.13 It is recommended the Guidance outlines what trunk road infrastructure will be required to be delivered when and by whom.	Transport Scotland	The Guidance concentrates on the mechanisms for securing contributions towards the identified package of transport infrastructure to be delivered by the Council. Improvements to the trunk road network will be determined and delivered by Transport Scotland. The Action Programme is the appropriate place to include guidance on the delivery of any project once they are fully identified.	No change proposed by the Council.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant Section of Guidance			
Para 6.13 It is considered further clarity and robustness is required in relation to the delivery of mitigation at Broxden given the progress made since publication of the previous Guidance. Transport Scotland has identified potential schemes that it is taking forward for further appraisal and will be contacting the Council in due course to discuss the final scheme for which contributions will be gathered. Additionally, monies already gathered through S75 Agreements should be utilised to deliver the final agreed scheme.	Transport Scotland	<p>The Action Programme is the appropriate place to include guidance on the delivery of any project once they are fully identified.</p> <p>The Council has provided Transport Scotland with a Memorandum of Understanding between the Council and Transport Scotland which sets out the terms for the transfer of all secured contributions towards the trunk road infrastructure projects.</p>	No change proposed by the Council.
Para 6.14 Provide a definition of 'Large' in terms of 'large' gross internal area of 'large' impact on transport network.	RP Planning/ Ristol	It is acknowledged that the use of the term 'large' lacks definition but as this is referring to wide range of possible developments including a strict definition may also cause issues to arise. The determination whether a contribution would be required will be determined through a review of any Transport Assessment submitted along with the planning application. The paragraph should be amended to clarify this position.	Amend Para 6.14 to read: 'In circumstances where non-residential developments are proposed which typically do not include built internal floorspace (for example quarries, outdoor leisure operations etc.) but are judged through a Transport Assessment to have a demonstratable impact on the transport network, the contribution level will be calculated on an individual basis.'
Para 6.15 Information should be provided on the appropriate formula applied for an application for planning permission in principle.	RP Planning/ Ristol	Para 3.8 identifies that where application for 'In Principle' planning permission then a condition will be added to any consent which will require the proposal to be assessed against the Guidance at the time of submission of the detailed application.	No change proposed by the Council.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant Section of Guidance			
<p>Para 6.18 In terms of contribution rates per development, page 21 of the Guidance states '<i>Any revised contribution level will not be applied retrospectively to consented planning permissions.</i>'</p> <p>Pilkington Trust are pleased to note this comment and fully support this position.</p>	Savills	The supporting comments are noted.	No change proposed by the Council.
7. Affordable Housing			
<p>Guidance to include a record of how the policy has influenced the distribution of affordable and sheltered housing and how it can support an equal distribution between rural and urban areas.</p>	Portmoak Community Council	<p>Perth and Kinross Council aims to deliver the right amount and type of housing in the right area (whether in an urban or rural setting).</p> <p>Perth and Kinross Council face a huge challenge to deliver the required homes as highlighted through our Housing Needs and Demand Assessment and through our Common Housing Register, and this is a challenge when delivering affordable housing and specialist accommodation within a rural area.</p> <p>We deliver against challenges like this by working together, having good clear policies, understanding local viability issues and through strong leadership. Planning for rural housing is not inherently different to that in urban areas and any development must meet identified market and affordable housing need. However, with rural development tending to be focused in larger, more expensive affordable homes which, coupled with limited supply it requires greater policy emphasis on providing smaller market and affordable homes.</p>	No change proposed by the Council.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant Section of Guidance			
		<p>Through our Local Housing Strategy, we ensure people have access to the right type of housing and support to live as independently as possible. Our Housing Service and Social Care Partnership play a key role in helping achieve the national health and wellbeing outcomes. We ensure that housing developments are flexible and meet the housing for varying needs standards to address people's existing and longer-term needs. Many of our new build properties are designed to facilitate independent living to meet the specific needs of households.</p> <p>A record of our proposed future housing is stated within the Strategic Housing Investment Plan which can be viewed online (Link to SHIP) which confirms how the policy has influenced the distribution of affordable and sheltered accommodation within Perth and Kinross.</p> <p>Our aim is to get better in supporting an equal distribution of both affordable and sheltered housing in both a rural and urban setting however dependent on current and future land supply and need.</p>	

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant Section of Guidance			
Para 7.3 The draft Guidance relies on the Housing Needs & Demand Assessment (HNDA) 2010 as evidence of need for affordable housing and a 25% benchmark. Further justification should be set out why a 2010 study is still relevant and when it is likely to be updated.	RP Planning/ Ristol	PKC Local Development Plan was informed through a robust HNDA completed in 2010 which was prepared through Scottish Government HNDA Guidance which was approved as robust and credible by the Scottish Governments Centre for Housing Market Analysis. The HNDA provides strong evidence to inform our Local Housing Strategy and approved Local Development Plan. The HNDA 2010 is still relevant as it provides a detailed analysis of housing need and demand over a 10-year period at a functional housing market level which covers all housing tenures. The current HNDA was signed off in 2010. It would seem sensible to prepare a new HNDA for sign off in 2020 and going forward maintaining a 5-year cycle. This consistency assists in analysing historic trends.	No change proposed by the Council.
Para 7.9 The inclusion of discounted serviced plots for self-build housing within the definition of affordable housing is supported.	RP Planning/ Ristol	The supporting comments are noted.	No change proposed by the Council.
Para 7.9 The principle of including “unsubsidised low cost housing for sale” as affordable housing is supported.	RP Planning/ Ristol	The supporting comments are noted.	No change proposed by the Council.
Para 7.9 The description for “Unsubsidised low cost housing for sale” appears to copy the description for ‘social rented’ within the same table. This should be checked for accuracy.	RP Planning/ Ristol	This section has been checked for accuracy and it is agreed that an amendment is required.	Amend Para 7.9 to read ‘Housing without public subsidy sold for an affordable level. Conditions may be attached to the missive in order to maintain the property at an affordable level for subsequent purchasers.’

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant Section of Guidance			
Para 7.13 Table A should be amended to provide guidance on taking a hybrid approach where a combination of one or more options is provided (on-site, off-site, commuted sum) and where self-build serviced plots are provided as affordable housing the land is likely to be transferred to a party, other than the Council or RSL.	RP Planning/ Ristol	The proposed amendment is agreed.	Amend Para 7.13 Table A to include ' (more than one may apply) '. Use Appendix 7 to contact Affordable Housing Enablers to discuss the affordable housing requirement for the site and agree approach to delivery'
Para 7.15 On-site housing should also include option of discounted service plots for self-build housing.	RP Planning/ Ristol	The proposed amendment is agreed.	Amend Para 7.15 to read: 'Where affordable housing is being provided on-site the housing will either be built by or transferred to an RSL or the Council with the exception of discounted for sale, unsubsidised homes, private rented accommodation or discounted serviced plots for self-build.'
It should be included that credits are an effective method to help stimulate rural affordable house building where it is required.	Scone Estates	Para 7.29 of the Guidance states: 'The Council will define the area within which credits can be used – this will be assessed on a site by site basis but will generally be within the same housing market area as credits were accrued' This can reflect urban/rural areas.	No change proposed by the Council.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant Section of Guidance			
8. Appendixes			
A table within the Guidance would be helpful to aid understanding of the exemptions.	RP Planning/ Ristol	Each section of the Guidance sets out the requirements and exemptions for the application for the Guidance to new development. It is acknowledged that a table setting out the key exemptions could be helpful, but it would not be able to accurately cover all exemptions as these are often decided on a case by case basis taking account of individual applications. It is not considered necessary to add an additional table to the Guidance.	No change proposed by the Council.

Comments on Forest and Woodland Strategy draft supplementary guidance

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
General Comments			
Welcome update to Forest and Woodland Strategy (FWS) and support Strategy's vision and themes including acknowledgement of change in forestry drivers e.g. climate change. Aim of strategic approach to guiding new woodland supported however caution noted against taking too prescriptive a view on this.	A member of the public	The purpose and scope of the strategy is to provide a strategic framework for the development of forestry in Perth and Kinross detailed statements regarding specific priorities, actions for implementation are beyond the scope of this Strategy. Further detail will be provided through individual forest management plans, the Forest Design Framework and other supplementary guidance where relevant (e.g. Green Infrastructure, Landscape Guidance etc.). This will be supported by detailed assessment at the site level on a case-by-case basis to ensure opportunities are realised and any impacts of proposals are suitably considered in line with LDP policy.	No change proposed by the Council.
No comments	Coal Authority	Noted.	No change proposed by the Council.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
<p>Welcome updated response to previous comments on guidance. Content with aims of FWS including spatial data (with further clarifications provided by PKC) developed in partnership with Scottish Forestry. Also welcome production of Policy Map E in LDP2 (as modified) which satisfies previous comments on this issue. Recommend strategy provides clear cross-referencing and alignment with other proposed SG especially Green & Blue Infrastructure & Landscape.</p>	SNH	<p>References to other relevant SG docs will be updated where necessary.</p>	<p>References to other SG docs updated on pages 3 and 8.</p>
<p>The contribution from Scottish Forestry in writing the Council's Strategy is acknowledged by the Council. Scottish Forestry has set out very clearly how it will deliver <i>Scotland's Forestry Strategy 2019–2029</i> with considerable guidance. What is far from clear in the earlier part of this document is how the Council will deliver its own Strategy and what will be different from that already covered by the Scottish</p>	Friends of the Ochils	<p>The PKC Forest and Woodland Strategy (2019) is a localised interpretation of the Scottish Forestry Strategy (2019). The overarching visions/objectives of the PKC Forest and Woodland Strategy are considered to be in accordance with the range of objectives contained in the Scottish Forestry Strategy. In terms of delivery, the FWS will support landowners, developers, communities and forest/woodland managers to realise opportunities for the sustainable management of forests and woodland in the Perth and Kinross area, with specific delivery actions noted</p>	<p>No change proposed by the Council.</p>

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
Strategy and what Scottish Forestry is providing.		in Section 6 (Priorities, Themes and Actions). PKC are required to set out the framework under which sustainable forest and woodland management can take place in the Council area and alongside Policy 40 of the LDP (2019) the FWS does this through the strategic framework guiding the location of new woodlands as well as setting out the key priorities/themes/actions for the area. Scottish Forestry also co-produced the FWS and no objections have been raised in respect of the relationship between the FWS and Scottish Forestry Strategy.	
The draft SG has been issued in connection with Local Development Plan 2019 although it refers to policy NE2 of the LDP 2014 (page 4). The draft SG should be clear on which policies it supplements and be reviewed to make sure it complies with the relevant regulations before adoption.	RP Planning Ltd	The SG will be updated to include reference to Policy 40 of the Perth & Kinross Local Development Plan (2019).	Updated policy reference on page 4 to <i>Policy 40</i> .

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
Cross referencing to Tables within the document should be checked as it is not clear which Table is being referred to in the text. A note should also be added to SG to say that the diagrams (e.g. p14, 17, 18, 27) are only for illustrative purposes only because it is not possible to relate them to specific sites.	RP Planning Ltd	Comments noted. The SG will be updated to include appropriate referencing of tables as well as a note to clarify that the mapping contained in the FWS is at a strategic scale and to be used for illustrative purposes only. The detailed Forest and Woodland Strategy map which is conceptualised in the Strategy diagram (pg. 24) is available on the Scottish Forestry website alongside other Councils FWS maps.	Updated table/map referencing and added note clarifying the role of the mapping on page 20.
RSPB Scotland was not a stakeholder involved in writing this strategy.	RSPB	RSPB have been invited to comment on the draft SG and PKC welcome their input in this regard.	No change proposed by the Council.
Note that this strategy updates the existing strategy on forest and woodland in order to align with the emerging Local Development Plan 2. In light of this we can confirm that we have no comments to offer on the updated guidance other than welcoming the continued focus on the good stewardship of the historic environment and recognition of the contribution made by forests and woodland to the historic environment.	HES	Comments noted and welcomed.	No change proposed by the Council.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
<p>Number of factors flagged for further consideration including: engagement with appropriate flood risk management authorities; need to consider whether work situated in flood-sensitive catchments where land-use changes could increase flood risk, run-off generation impacts, addition debris sources for watercourses, and climate change adaptation.</p>	<p>PKC – Flooding Team</p>	<p>The UK Forestry Standard sets out the guiding principles under which proposals are assessed and include the following key considerations:</p> <ul style="list-style-type: none"> • Biodiversity • Climate change • Historic environment • Landscape • People • Soil • Water <p>These key themes identify a wide range of considerations that individual proposals will be expected to take in to account. The FWS (as outlined in page 9) identifies that proposals must ensure woodland removal and creation is developed in accordance with the UK Forestry Standard. As such the FWS already ensures that relevant environmental and social factors are taken in to account in the design and assessment process recognising the nationally-agreed standard for forestry/woodland management.</p>	<p>No change proposed by the Council.</p>

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
Executive Summary			
<p>Page 4. The Strategy's aims are set out, but not how they will be achieved:</p> <ul style="list-style-type: none"> • guiding and supporting LDP Policy NE2: specifically; how? • in particular, a strategic approach is required to identify areas for woodland creation with indicative, clear mapping. Further consultation is required on this. This strategic approach is required not just across Perth & Kinross covering the Ochils, but also in conjunction with Clackmannanshire Council and Stirling Council to provide a consistent approach across the entire Ochils. 	Friends of the Ochils	The purpose and scope of the strategy is to provide a strategic framework for the development of forestry in Perth and Kinross; detailed statements regarding specific priorities and actions for implementation are beyond the scope of this Strategy. Further detail will be provided through individual forest management plans, the Forest Design Framework and other supplementary guidance where relevant (e.g. Green Infrastructure, Landscape Guidance etc.). This will be supported by detailed assessment at the site level on a case-by-case basis to ensure opportunities are realised and any impacts of proposals are suitably considered in line with LDP policy, particularly Policy 40 (Trees, Forestry and Woodlands). The strategic framework associated with the 2014 FWS SG has been carried forward in to the new draft as part of the 5-year review of the 10-year strategy. The detailed Forest and Woodland Strategy map which is conceptualised in the Strategy diagram (pg. 24) is available on the Scottish Forestry website alongside other Councils FWS maps and provides consistent, indicative mapping across Council areas.	No change proposed by the Council.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
<ul style="list-style-type: none"> woodland removal is set out clearly in a policy document from Scottish Ministers. Perth & Kinross Council needs to a) identify woodland removal as a last resort and b) set out the circumstances when this may be considered. our second comment above applies to guiding development for planting schemes and grant. This requires additional guidance for applicants that is also available to a wider audience to be able to understand the implications of these schemes. Examples are the publications available on the website of Forestry Scotland. Further consultation is required on this. Would be pleased to be included in screening and scoping exercises for EIA applications. 		<p>Policy 40 of the LDP (2019) clearly sets out that proposals that involve woodland removal will be considered in the context of the Scottish Government's Policy on the Control of Woodland Removal.</p> <p>Planting grants fall within the remit of Scottish Forestry including associated guidance to support this process. The Councils Strategy map has been provided via the Scottish Forestry website alongside other Councils. The Scottish Forestry website provides detailed information on areas benefiting from Forestry Grant Scheme funding; forestry Grant Scheme target and eligibility areas; felling permissions and plans; and legacy grant applications to assist with informing woodland creation.</p> <p>In relation to the request to input in to future proposals (both EIA/Forest District Strategic Plans) PKC will ensure that the legislative requirements for consultations are met.</p>	

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
<ul style="list-style-type: none"> Would be pleased to be included in the review of Forest District Strategic Plans. 			
Part 1 – Introducing the Strategy			
<p>Introduction needs to be amended to include a better balance including further consideration of significant increase in woodland cover in Perthshire before 18th and 19th centuries including coverage in Roy Military Survey of Scotland 1747-55 mapping (much of which is included in the Ancient Woodland Inventory of Scotland). Ochils have considerable area of woodland of cultural importance and for biodiversity.</p>	Friends of the Ochils	<p>The Guidance was developed in collaboration with Scottish Forestry and no updates are considered necessary in relation to introducing the strategy. Specific proposals relating to forests and woodlands within the Ochils area will be able to consider the detailed information which has been highlighted taking in to account the proposal, the site and the surrounding area as well as any relevant historical/cultural information. The SEA has been developed incorporating a range of woodland interests including native woodland, ancient woodland and SSSI (woodland interest), all of which have been included in the spatial framework to help shape the spatial priorities of the FWS.</p>	No change proposed by the Council.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
Part 2 – Woodlands and Forests in a Scottish Context			
<p>Page 8. Reference is made to <i>A Land Use Strategy for Scotland 2016 - 2021</i>, but there is no indication how Perth & Kinross Council will help to support this. The Strategy gives rise to a number of considerations and the Council needs to set out its position on this. Two examples follow in relation to land use decision-making and regional land use partnerships.</p>	<p>Friends of the Ochils</p>	<p>Key visions/objectives associated with the Land Use Strategy (2016-2021) have been considered in the drafting of the Guidance including specific assessment of the compatibility of the overall visions/objectives of both documents. Scottish Forestry has also been consulted on the draft Guidance and raised no comments in relation to the compatibility of the Guidance with other key national strategies.</p> <p>Looking specifically at the two examples provided, neither of these are statutory duties. PKC support the principle of these aims but it is not for the FWS to identify how these will be supported explicitly. It is also important to note that the FWS is specifically a land use planning document so the primary focus is on engagement through planning process although other opportunities for wider engagement should be encouraged where possible.</p>	<p>No change proposed by the Council.</p>

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
<p>7.2 Of 10 points listed on page 11 only the last one relating to Forest District Strategic Plans, long-term Forest Design and Management Plans can be imagined how implementation will be achieved through collaboration with SF. Concerns raised how other 9 points will be achieved.</p>	<p>Friends of the Ochils</p>	<p>Ongoing monitoring of proposals submitted to PKC will be undertaken to help inform the review of further strategy work in this sector. Engagement with Scottish Forestry and other relevant stakeholders will also be undertaken to ensure that ongoing and future implementation of key objectives is optimised.</p>	<p>No change proposed by the Council.</p>
<p>Part 3 – Woodlands and Forests in Perth and Kinross Today</p>			
<p>7.3 Query raised regarding the listing of woodland types in table of woodland types on page 13.</p>	<p>Member of the public</p>	<p>Figures are sourced from Scottish Forestry – National Forestry Inventory. For a detailed understanding of data capture and categorisation please see the metadata supplied in the following link.</p>	<p>No change proposed by the Council.</p>

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
Update text on page 13 to take in to account contribution from oak woods and other broadleaved woodlands to biodiversity.	Friends of the Ochils	Text to be updated to reflect suggested change.	Updated statement on pages 10-11 to add in following text <i>“Oak woods and other broadleaved woodlands in Perthshire provide a similar function and overall provide a greater contribution to biodiversity.”</i>
7.4 Concern raised about the statement ‘more of the same’ on page 15 as the Strategy needs to be explicit about what it aims to achieve and how this is to be done.	Friends of the Ochils	The overall purpose and specific visions and objectives of the Strategy are explicitly set out in the FWS document. As noted above, the overall aims and objectives of the FWS have been considered in relation to the Land Use Strategy and these are considered to be compatible and to reflect the Scottish Government’s policy to consider land use including forestry holistically.	No change proposed by the Council.
Text on the following opportunities and challenges (p.15) supported: our woodland heritage, broadleaves for quality timber, farm forestry, connecting and protecting habitats at a landscape scale, landscapes, and placemaking.		Woodland expansion: the FWS Strategy map provides an indicative spatial framework which targets where there are opportunities for new planting as well as the locations of existing sensitivities and constraints at a strategic scale. The detailed Forest and Woodland Strategy map which is conceptualised in the Strategy diagram (pg. 24) is available on the Scottish Forestry website to guide woodland	Opportunities and Challenges (p.13) – added further text reflecting suggested changes for: <ul style="list-style-type: none"> • softwood timber production and processing.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
<p>Woodland expansion: there is no reference to where this expansion might take place and qualification is required.</p> <p>Woodland removal: need for Council to set out its policy position on woodland removal.</p> <p>Softwood timber production and processing: need for Council to consider transport impacts from any timber haulage and provision of sawmilling facilities.</p> <p>Fuelwood and short rotation crops: short-rotation broadleaves should not be viewed solely as a source of fuel as they can provide a market for traditional crafts, with a further benefit of tourist interest. This could also provide a market for furniture, indoor and outdoor. The use of wood for these purposes sequesters carbon for a much longer period than the use for wood fuel.</p>		<p>expansion. Proposals will be dealt with on a case by case basis against the LDP policy framework as well as other key national policy and guidance.</p> <p>Woodland removal: as noted above Policy 40 of the LDP (2019) clearly sets out that proposals that involve woodland removal will be considered in the context of the Scottish Government's Policy on the Control of Woodland Removal.</p> <p>Softwood timber production and processing: potential transport impacts from timber haulage is recognised as an important issue and SG text will be updated to reflect this.</p> <p>Fuelwood and short rotation crops: Priority and actions included to encourage the development of local timber markets by local businesses, particularly markets based on wood fuel and added value craft products (p.30). Indicators of progress include training and skills measures such as number of people enrolling or registering for forestry related short courses, qualifications and Modern Apprenticeship programmes. Potential market of short rotation crop from broadleaves for traditional crafts is recognised and SG text will be updated to reflect this in the Opportunities and Challenges section.</p>	<ul style="list-style-type: none"> • Fuelwood and short rotation crops

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
<p>Community and urban-fringe forestry: this is supported, but there must also be assistance to meet the pressures from public use.</p> <p>Climate Change Adaptation: the principle of planting trees for sequestering carbon is proven as is their use in flood control. The use of wood fuel has to be treated cautiously; it has been and continues to be a source of pollution in the UK and other parts of the world. A recent publication provides advice: <i>The Potential Air Quality Impacts from Biomass Combustion</i>, DEFRA, 2017.</p>		<p>Community and urban-fringe forestry: proposals for community and urban-fringe forestry are supported and any issues with particular pressure(s) from public use will be dealt with on a case by case basis depending on the individual characteristics of the site and surrounding area and any ownership/maintenance regime proposed.</p> <p>Climate Change Adaptation: comments noted. PKC Environmental Health are consulted on proposals where there may be an air quality issue.</p>	
Recommend expanding existing wording to identify carbon rich soils should be protected in line with LDP policy as they are carbon stores and have a role in climate change mitigation.	SEPA	The SG will be updated to include explicit reference to the protection of carbon rich soils as a climate change mitigation measure.	Added new challenge 'Climate Change Mitigation' to page 14 and include reference to CR soils.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
Part 4 – Achieving the Vision			
Whilst some of the vision is desirable the following page fails to demonstrate how the vision will be realised and what the Council will do towards this.	Friends of the Ochils	Page 18-19 of the draft FWS outlines the priorities and key themes PKC will utilise to assist in achieving the vision set out on pages 17-18. The priorities and themes set out pragmatic steps to assist PKC – alongside key stakeholders – in achieving the overall vision, which is considered to be in accordance with the overall vision of the Scottish Forestry Strategy.	No change proposed by the Council.
Local Priorities - Four strategic priorities are set out in the Draft SG (page 21). Policy 40 (Forestry, Woodland and Trees) states that the Council will support proposals which, amongst other matters, meet “local priorities”. It would be helpful if the SG could explain what such local priorities are or could be.	RP Planning Ltd	Local priorities will be considered on a case by case basis taking in to the individual characteristics of the site and surrounding area and the nature/scale of the proposal to be considered. This approach is considered to be a pragmatic and non-prescriptive way to consider local priorities in relation to forestry/woodland proposals. For example, a local priority for a specific geographical area may suggest the planting of a particular native tree type to support specific biodiversity objectives.	No change proposed by the Council.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
Page 20 should include clear reference to the priority native woodland habitats in the Tayside LBAP 2016-2026. Guidance should also include more ambitious aim in relation to black grouse recovery for 2034. Open ground habitats are not just important in the uplands, lowland wet areas are also important for breeding waders.	RSPB	Section to be updated to make specific reference to supporting priority native woodland habitats as identified in the Tayside LBAP. Comments in relation to black grouse and importance of specific land characteristics for breeding waders are noted however the vision on p.17 is intended to be a high level, strategic vision delivered through the key priorities and themes in Part 6 so no additional changes considered necessary.	Part 4 – Achieving the Vision – page 20/1. Updated text to refer to Tayside LBAP.
Support commitment to UK Forestry Standard being material consideration and proposals should accord with the Forestry Standard.	SEPA	Comments noted and welcomed.	No change proposed by the Council.
Part 5 – Geographic Priorities for Woodland and Forestry			
Page 23. Seek copy of Forest Research as referenced in the FWS. While many of the statements might be supported on this page, the guidance following is too simplistic to be meaningful, including the map on p27. This section is so poor that there is no meaningful guidance to comment on.	Friends of Ochils	This refers to the Landscape Capability for Forestry research undertaken by the Macaulay Land Use Research Institute (JHI). https://soils.environment.gov.scot/maps/capability-maps/national-scale-land-capability-for-forestry/	No change proposed by the Council.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
		The detailed Forest and Woodland Strategy map which is conceptualised in the Strategy diagram (pg. 24) is available on the Scottish Forestry website. See also comments below on mapping.	
<p>Local Sensitivities</p> <p>The guidance at page 26 emphasises that proposals for woodland restructuring, creation and expansion need to be assessed on a case-by-case basis to take account of local sensitivities. This is welcomed. But in addition, other matters such as ‘constraints’ should also be taken into account.</p>	RP Planning Ltd	Specific reference to ‘constraints’ will be added to reflect that proposals will take account of both sensitivities and constraints, in line with the 3 rd paragraph of page 10 (purpose and scope).	<p><i>Guiding the Location of New Woodlands – page 23:</i></p> <p>Added in reference to ‘constraints’ on page 23.</p>

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
Recommend that the specific reference to blanket bog within the land use constraints referred to in this section is expanded to carbon rich soils as this is in keeping with local development plan policy. Recommend that the wording of the second paragraph on page 24 is expanded to clarify that proposals will be required to take account of local sensitivities in line with the most up to date data and guidance.	SEPA	The SG text will be updated to include explicit reference to the protection of carbon rich soils including taking in to account most up to date data and guidance in line with LDP Policy 51 (Soils).	<i>Guiding the Location of New Woodlands – pages 20-21:</i> <ul style="list-style-type: none"> • Added in specific reference to carbon rich soils (p.20) • Added in suggested text to second paragraph of p.21
Part 6 – Priorities, Themes and Actions			
Draft FWS clearly recognises both the values of native woodlands & that our remnants are under pressure within Perth & Kinross - one of the strongholds for native woodlands in Scotland. Following recommendations suggested to help implement various aspirations in FWS:	Member of the public	The removal of woodland and forested areas is subject to the Scottish Government's Policy on the Control of Woodland Removal. This policy is in accordance with the Climate Change Plan as well as the UK Forestry Standard and therefore identifies the circumstances under which removal is deemed to be acceptable including issues surrounding climate change in relation to tree removal. As the policy framework for woodland removal is already set at the national level (and recognised in Policy 40 of the LDP (2019)) it is not considered necessary to add in additional text in this regard.	No change proposed by the Council.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
<p>Native woodlands have been in decline in Perth & Kinross (& elsewhere) for many years. Such woodlands represent our richest terrestrial wildlife habitat & I recommend that your Supplementary Guidance flags this up. Your Guidance should also flag up the key importance of conserving natural habitats to help avert the Climate Emergency.</p> <p>Building developments both adjacent & within native woodlands are incompatible with maintaining habitat integrity. The such siting of these developments should therefore not be permitted in future. This cannot be mitigated by habitat creation elsewhere, as native woodland remnants, with their genetic integrity going back 8000 years, cannot be replicated.</p>		<p>In addition, existing native woodland and new planting areas will be managed in line with UKFS guidelines for a range of benefits, and seek to minimise future risks from climate change, for example from tree pathogens, through the creation of forest habitat networks, and using diverse tree species, improve the quality of life and well-being of people by supporting community development, encourage outdoor education and encourage the use of UK Forestry Standard and relevant Forest Guidelines to protect water and soil resources, including riparian and upper catchment planting (see Part 6 Priorities, Themes and Actions).</p>	

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
Page 29 - Proposal for review is supported.	Friends of the Ochils	Comments noted and welcomed.	No change proposed by the Council.
<p>Page 40 include The Allan water catchment project which includes riparian planting and is a partnership project with SEPA, SNH, Forth Fisheries Trust and RSPB Scotland.</p> <p>Page 42 we welcome the opportunities for action.</p> <p>Page 43 welcome that area of native woodland is an indicator.</p>	RSPB	Update text on page 40 to include Allan Water Catchment Project.	<p><i>Part 6 – Priorities, Themes and Actions – Priority 4 (p.36):</i></p> <p>Updated text to include reference to the Allan Water Catchment Project.</p>
Maps			
Improvements could be made in the quality of the maps to allow readers to identify locations. As currently presented, the maps do not readily allow this to happen, which does not sit well with the aim of addressing uncertainties expressed on page 10.	Member of the public	The purpose and scope of the strategy is to provide a strategic framework for the development of forestry in Perth and Kinross and inform decisions about the location of all types of new woodland. The maps provide a strategic scale guide to the appropriate locations for forestry to minimise the likelihood of undesirable environmental or social outcomes. The conceptual map has been designed to	<p><i>Part 3 – Woodlands and Forests in Perth and Kinross Today:</i> Add note to maps on pages 15, 16 and 24 to clarify purpose of maps with</p>

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Relevant section/paragraph of Guidance			
<p>Page 17. Information on ‘Sensitivities’ map is poorly presented. All that can be said is the Strategy has failed to address the subject.</p> <p>Page 18. The ‘Opportunities’ map is little better. It indicates better agricultural land for tree planting and while some may be possible, higher land values in the lowlands and falling incomes in the uplands will direct woodland planting to the uplands. The Strategy has failed to recognise the pressures on the Ochils and how to deal with them.</p>	Friends of the Ochils	<p>provide clarity and communication of key messages at a strategic level in line with Skeleton mapping approach taken at a national level (Scottish Government). Map design has been developed in partnership with the Scottish Government for the purpose of conveying a clear message to a wide audience. A note will be added to the maps on pages 17, 18 and 27 to clarify that they are interactive and individual considerations can be clicked on/off by hovering over the map legend entries.</p> <p>Detailed maps regarding specific sites or priorities for implementation are beyond the purpose and scope of this Strategy and will be dealt with at the more appropriate scale of site specific proposals (e.g. Forest Design Plans, Planning applications etc.)</p>	<p>instructions how to view individual map legend entries.</p> <p><i>Part 5 – Guiding the Location of New Woodlands:</i> Added link to SF website for detailed mapping for FWS on page 20.</p>
Highlight that we have found the mapped output within the strategy difficult to read.	SEPA	The detailed Forest and Woodland Strategy map which is conceptualised in the Strategy diagram (pg. 24) is available on the Scottish Forestry website. The SG will be updated to provide a link to the map on the SF website.	

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Relevant section/paragraph of Guidance			
Generally support themes 1-7. Theme 5 (Access and Health). “Appropriate tourism infrastructure” is not sufficiently defined, even with the addition “such as interpretive centres”. There is a current trend towards trivialising the importance of rural culture, to provide instant gratification for a less than well informed public. Friends of the Ochils seek further consultation to ensure sensitive infrastructure is provided with a true, quality experience	Friends of the Ochils	In relation to the comment on <i>Theme 5 Access and Health</i> PKC consider that the term ‘appropriate tourism infrastructure’ is suitable and provides scope for specific proposals relevant to the site and surrounding context to be developed.	No change proposed by the Council.

Green and Blue Infrastructure draft supplementary guidance

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
1. General Comments			
Confirmed support for the provision of a spatial strategy which is better focussed on settlement scale opportunities, and expansion and enhancement of the green/blue network. SNH also supports the clearer language and structure of this revised guidance.	SNH	The supporting comments are noted.	No change proposed by the Council.
HES welcomes the improvements made in terms of the online spatial tool as well as the specific opportunities identified at the settlement and strategic scales. The recognition of the contribution made by gardens and designed landscapes is appreciated.	HES	The supporting comments are noted.	No change proposed by the Council.
It would be beneficial if the document referenced other guidance on the design and implementation of active travel infrastructure to ensure best practice.	TACTRAN	The Council does not have their own best practice guidance on the implementation of active travel infrastructure. From the list of guidance recommended by TACTRAN, Transport Scotland's Cycling by Design has been referred to as an advisory document in the past however this will soon be reviewed. The updated guidance is expected to provide a better baseline for designing for active travel and once completed can be referred to in planning guidance.	No change proposed by the Council.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
The guidance should emphasise the importance of native woodlands and flag up the key importance of conserving natural habitats to help avert the Climate Emergency. Developments both adjacent & within native woodlands are incompatible with maintaining habitat integrity and should not be permitted.	Member of the public	Woodlands are an essential component of GI and form part of the guidance, including the online map and data analysis (See Appendix 1 of the guidance). The guidance states that “all development should avoid fragmentation or loss of existing green/blue resources and look to enhance these” and encourages “connecting fragmented woodland through new planting or regeneration”. It cannot be stated however that development adjacent to or within native woodland will be refused planning permission. In order to determine proposals which may have an impact on woodlands, the Council follows the Scottish Government’s policy on control of woodland removal .	No change proposed by the Council.
2. Introduction			
Additional key linkages of health and wellbeing and climate change adaptation could be added to the spider diagram.	SEPA	<p>The diagram was prepared to illustrate the relationship between this guidance and other Local Development Plan policies. Climate change mitigation and well-being are overarching aims that the individual policies contribute to – this could be reflected better in the vision statement.</p> <p>Section 4 also states that: “Green/Blue infrastructure allows the essential <u>benefits of nature to be provided to people</u>. These essential benefits are known as ecosystems services and include the provision of food, clean air and water, regulating the effects of <u>climate change</u>, and cultural benefits such as <u>providing opportunities for recreation and exercise</u>.”</p>	<p>Amend description under the spider diagram to read as:</p> <p>Proposals should take into account other Local Development Plan policies and guidance relevant to the delivery of green infrastructure.</p> <p>Amend the vision statement to read as:</p> <p>Green infrastructure across Perth and Kinross will be high quality and multifunctional, allowing the free and easy movement of people and wildlife. It will deliver a wide range of ecosystem services,</p>

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Relevant section/paragraph of Guidance			
			contributing to climate change adaptation and mitigation as well as well-being.
The SG could highlight that linkages to Local Place Plans (LPPs) should be considered in developing green infrastructure and opportunities for incorporation of LPP objectives maximised.	SEPA	The diagram under the 'How to use this guidance' section highlights that community input should inform proposals throughout their development. This will also ensure that any green infrastructure opportunities already identified within existing community plans are considered. Once secondary legislation regarding LPPs is passed, their place within the planning process will be clarified and they can be referred to in planning guidance.	No change proposed by the Council.
The last sentence of the first paragraph is presumptive: "guidance to help direct actions that enhance our natural resources." Development often denigrates natural resources.	Member of the public	The full sentence reads as: "Community groups and Council services are also encouraged to use the guidance to help direct actions that enhance our natural resources." The purpose of the guidance is to encourage best practice and help ensure that GI is considered in development proposals and other projects.	No change proposed by the Council.
3. The Vision			
The vision could be expanded to highlight the contribution to social cohesion/health and wellbeing and educational aspects.	SEPA	The Council agrees that delivering green and blue infrastructure contributes to a number of social and environmental objectives. The definition of GI (Section 4) already refers to education, habitat creation and health as benefits delivered through GI.	Amend the vision statement to read as: Green infrastructure across Perth and Kinross will be high quality and multifunctional, allowing the free and easy movement of people and wildlife. It will deliver a wide range of ecosystem services and contribute to climate change adaptation and mitigation and well-being.
The aim of the strategy should be to create a nature-rich city with benefits for all citizens.	Perth Christies	The vision statement can be amended to specifically mention well-being as a key aim of the guidance.	

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
The vision is presumptive; development arising from both local development plans will reduce the movement of people and wildlife.	A member of the public	The vision statement is a declaration of the objective the Council aims to achieve by preparing and implementing this guidance. The guidance encourages best practice and helps ensure that GI is considered in development proposals.	No change proposed by the Council.
Temporary green infrastructure cannot be considered a mitigation measure.	A member of the public	Temporary use is mentioned within Policy 40 that is quoted in the guidance under Section 2. The policy does not suggest that temporary greening is a mitigation measure. It is simply good practice that the Council encourages.	No change proposed by the Council.
4. How to use this Guidance			
Support the flow chart which considers green infrastructure as part of a development's early concept plan.	SNH	The supporting comments are noted.	No change proposed by the Council.
<p>With regards box 1, it would be useful for landscape architects to have hydrology of site information available to overlay when looking at blue-green linkages in order that they can design in this context.</p> <p>In box 2, Blue/Green infrastructure should complement access and active travel routes across the site and not just primary access routes. It should be integrated from streetscape up for example bioretention features fed by dropped kerb for individual housing</p>	SEPA	The Council agrees with SEPA's comments, the diagram can be amended to provide clearer advice.	<p>Amend the text in the diagram to read as:</p> <p>"As part of the site appraisal, identify existing green and blue infrastructure to protect and enhance. Use the online map alongside relevant surveys and records (e.g. on biodiversity, hydrology) and community and stakeholder input."</p> <p>"Make green and blue infrastructure part of your early design work and concept plan, similar to road layouts or access points."</p>

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
plots.			“Develop a proposal and design statement which demonstrates how the development will enhance green and blue infrastructure at different scales.”
Make it clear that the design of proposals should also be informed by a ‘site appraisal’, ‘design and development’ work, and, where relevant, a ‘masterplan’ in order to identify opportunities for new infrastructure.	RP Planning	The table on page 4 outlines the process from site appraisal stage to developing proposals with GI in mind. Masterplanning is also referenced throughout the document.	Amend the text in the diagram to read as: “Make green and blue infrastructure part of your early design work and concept plan...”
It is difficult to see how larger developments in both local development plans can achieve the following: “Develop a proposal and design statement which demonstrates how the development will enhance green and blue infrastructure.”	A member of the public	The guidance requires developers to analyse the site context with regards to green and blue linkages and develop a proposal that allows for the protection and enhancement of these assets. The design statement is a tool to explain the applicant’s train of thought, show different options that have been tested throughout the process and highlight measures which contribute to GI (e.g. additional planting)	No change proposed by the Council.
5. What is Green and Blue Infrastructure?			
The section clearly defines green and blue Infrastructure and principles. Recommends adding biodiversity as a function and having greater emphasis throughout the guidance on the value of using native species where appropriate.	SNH	The Council agrees that promoting biodiversity should be mentioned and proposes to expand neighbourhood level opportunities in relation to this.	Add ‘promoting biodiversity’ to the list of ecosystem services. Under neighbourhood level opportunities in Section 5, amend the text to read as:

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Relevant section/paragraph of Guidance			
		The use of native species is promoted both by Policy 40: Forestry, Woodland and Trees as well as the new Supplementary Guidance on Open Space which provides detailed advice on landscaping and design. Site specific developer requirements also call for native planting where considered appropriate.	“Green/blue infrastructure should be designed and planned to support and increase biodiversity by considering proximity to natural habitats, habitat heterogeneity, presence and requirements of native species, patch size and management practices.”
Mention the marketability benefits to developers of well-planned green infrastructure.	SNH	The Council agrees that GI can contribute to increasing the quality of life and benefit people in made different ways. The list of ecosystem services already highlights active travel, recreation, health and education but this can be expanded further. Paths, woodlands and watercourses are considered green and blue infrastructure and have been identified on the online map. Road verges are not captured by data but where they have beneficial features, can be considered GI. The definition includes examples of ‘green features’, it is not a definitive list. In terms of sport facilities, parks and open spaces, including playing fields are included in the data analysis. The Open Space SG includes more information on how these areas can be designed to provide biodiversity and landscape benefits. Tennis courts and bowling greens are also part of the	Add `cultural value and sense of place` to the list of ecosystem services.
Benefit in terms of economic uplift associated with enhanced “sense of place” could be added to the definition of Multifunctionality and opportunities for better social inclusion across the site could be included in Connectivity.	SEPA		Under Multifunctionality, include the following text: Well planned green and blue infrastructure also contributes to creating character and a sense of place, increasing the value of developments.
Ecosystem services should include noise abatement and cultural services provided by GI should also be acknowledged. The definition of green & blue infrastructure should include verges of roads, paths and watercourses where these have natural vegetation such as wildflower grassland or shrubs. Woodland should be defined not just by the presence of trees but also shrub layer and ground flora of woodland plants.	Perth Christies		Under Connectivity, include the following text: Connecting green and blue features facilitates the movement of wildlife and by incorporating paths, it also provides opportunities for active travel and better social inclusion across the area.

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Relevant section/paragraph of Guidance			
Definitions should be consistent with the ones given in the Glossary of LDP2 (e.g. Green Infrastructure). For example, the LDP includes 'quality of life' within its definition which could include sports facilities.	RP Planning	Greenspace Open map and the Council hasn't excluded anything from this data as a base layer https://www.ordnancesurvey.co.uk/documents/os-open-greenspace-product-guide.pdf	
The following sentence is misleading. "Green/Blue infrastructure allows the essential benefits of nature to be provided to people."	A member of the public		
Note in the guidance that whilst they may not constitute green infrastructure; sport areas such as tennis courts and bowling greens are important in terms of planning for sport; health and recreation.	Sport-Scotland		
6. Delivery of Green and Blue Infrastructure at Different Scales			
The draft SG must not require applicants to improve the network beyond the development site. Policy 42 (Green Infrastructure) only refers to the green infrastructure "within and linked to the site", but the draft SG appears to go further and suggests that improvements could be sought from a wider area.	RP Planning	Developers will not be required to provide landscaping outside of the site boundary. However, submissions should show an understanding of the wider context and how GI within the site can link to the existing network outwith the red-line boundary. Some sections could be reworded to avoid misunderstanding.	Amend the text under Neighbourhood level opportunities to read as: "Developments should create networks that link to green infrastructure beyond the site boundary". Amend the text in the opening paragraph of Section 5 to read as:

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Relevant section/paragraph of Guidance			
			“Thought must be given as to how existing resources will be protected and new green/blue infrastructure will connect to other habitats and green/blue features beyond the ‘red line’ boundary of the development site.”
Generally, supports this section however the cycle path on the Bertha Park drawing is too narrow to act as a multifunctional route and doesn’t illustrate good practice	SNH	The illustration was included as it represents well the relationship between the green, blue and access elements of Green Infrastructure. The drawing is only conceptual and it would be ensured at the detailed design stage that the path is suitable for multiple users.	Caption to be modified as follows: “Conceptual drawing of Bertha Park pond and cycle path on the edge of housing development”
Support the encouragement of the daylighting of culverts; reference could be made to PKC’s Flood Risk guidance with regards this issue and proposed river crossings, along with reference to the CAR Practical Guide to ensure readers are aware of the authorisation requirements of river crossings.	SEPA	References will be added to the guidance.	Add the following text to page 8: “See the Council’s Flood Risk Guidance and the CAR Practical Guide for detailed advice on culverts and river crossings.”
Road and path verges should be more imaginatively designed to provide habitat by using nutrient-poor soil and seeding with perennial mixtures of Scottish grasses and wildflowers that can withstand occasional (or even frequent) mowing.	Perth Christies	Page 8 of the guidance (‘Streets’) encourages creating multifunctional verges which help absorb runoff and add green value. The Open Space guidance goes into more detail about landscape design and promotes low maintenance solutions which are beneficial for biodiversity. It is not considered necessary to add more detail to the GI guidance.	No change proposed by the Council.

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Relevant section/paragraph of Guidance			
Development over a certain size should be required to provide a traffic free link to the nearest point on the national cycle network, or at least have a safe cycling and walking route to the nearest schools and shops. Planning officers should investigate whether informal walking routes exist as part of their assessment of planning applications and ensure that the developer provides footpaths to preserve these routes.	A member of the public	<p>The Council agreed with the need to connect to existing cycle infrastructure, walking routes and utilise existing desire lines within development sites. There are however other policies and guidance that provide detailed advice on active travel and masterplanning.</p> <p>Policy 60 in the Local Development Plan states that: "New developments should provide access from the development to off-road walking and cycling provision as part of the green network, and contribute to its enhancement and improved connectivity. Existing active travel routes will be safeguarded and incorporated into development. Cycle parking facilities should be provided."</p> <p>The Council's Placemaking Guidance highlights the need to identify and where possible follow informal walking routes and 'desire lines' under the 'Accessibility & Permeability' chapter. Applicants are required to consider routes across the site that people are most likely to take, providing direct access and minimising detours.</p> <p>Furthermore, Transport Scotland's Cycling by Design has been adopted as an advisory document however this will soon be reviewed. The updated guidance is expected to provide a better baseline for designing for active travel and once completed can be referred in this supplementary guidance.</p>	No change proposed by the Council.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
In relation to the opening paragraph of section 5.1; the guidance should demonstrate where “adverse effects” on existing green and blue infrastructure will be unacceptable and lead to refusal of planning applications.	A member of the public	It depends on the context of the site and the proposal itself what would constitute as an unacceptable adverse effect. The guidance and the policy presume against the removal of GI and fragmentation of wildlife habitats, and this is taken into account at the determination of planning applications.	No change proposed by the Council.
There is little evidence that “Strategic developments provide opportunity to deliver large scale green/blue infrastructure.	A member of the public	Strategic developments, where designed with green and blue infrastructure principles in mind can deliver new GI that links to the existing network. The website below includes some example case studies developed by CSGN: https://www.gcvgreennetwork.gov.uk/what-we-do/delivering-green-infrastructure	No change proposed by the Council.
7. Perth and Kinross Green & Blue Infrastructure Strategy			
The Council should undertake effective monitoring and assessment of the success of delivery of green infrastructure for specific developments.	SNH	The comment is noted and welcome.	No change proposed by the Council.
Under ‘the output’ section, recommends inserting wording stating that the opportunities table should be read in conjunction with the online map.	SNH	This is already stated on page 13.	No change proposed by the Council.

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Relevant section/paragraph of Guidance			
State that the map may not be 100% accurate but that where elements of green or blue infrastructure are not included on the map; if they clearly meet the relevant criteria; then they should be appropriately protected and considered in the design process.	Sport-Scotland	<p>The Council used the most accurate, available open data for this guidance (i.e. OS Greenspace map supplemented with local data where available. Ordnance Survey is committed to maintaining its products to the highest levels of accuracy and currency. The initial capture of data for Open Greenspace was completed using existing topographic databases and aerial imagery however OS cannot guarantee that all relevant sites will be included in the data.</p> <p>OS has processes in place to allow expert users to feed back on the product and allow us to act on potential omissions and improvements to content, subject to accuracy checks.</p> <p>https://www.ordnancesurvey.co.uk/documents/os-open-greenspace-product-guide.pdf. It is crucial that designers and developers consult all available sources for information, including site surveys and stakeholder engagement.</p>	<p>Add the following text to Appendix 1 and to the online map:</p> <p>The Council has used the most accurate, available open data for this Guidance (i.e. OS Greenspace map supplemented with local open data – see table) Ordnance Survey is committed to maintaining its products to the highest levels of accuracy and currency. OS has processes in place to allow expert users to feed back on the product and allow OS to act on potential omissions and improvements to content, subject to accuracy checks.</p> <p>Data displayed on the online map should always be validated through detailed site assessments. Features which are not identified on the map but could be classified as green/blue infrastructure should be protected and considered in the design process.</p>
Net gain should be a requirement for development - not just limiting impacts on green & blue infrastructure but creating more than was there before.	Perth Christies	The guidance encourages enhancement of wildlife through the provision of green and blue infrastructure in accordance with Policy 41 of the LDP which seeks to protect and enhance wildlife and habitats but does not require a net gain.	No change proposed by the Council.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
This guidance needs to identify how green/blue infrastructure to be provided will be maintained, such as providing a management plan with the planning application and identifying committed financial resources.	A member of the public	Applicants are required to have an agreement in place for the management of landscaped areas within their site. The Open Space Guidance outlines the options developers have for the long-term maintenance of open spaces. It is not considered necessary to reiterate it in this guidance.	No change proposed by the Council.
8. Opportunities Table			
Welcomes the strategic green network link shown from Perth to Dundee, which forms part of TAYplan's strategic green network.	SNH	The supporting comments are noted.	No change proposed by the Council.
The table and the online map should identify further potential strategic linkages as well as additional active travel routes (e.g. segregated cycle ways) within and beyond the Council area.	SNH	<p>The revision had a limited scope and the Council decided to focus on data analysis and internal consultation as a means of information gathering. However, the value of cross-boundary thinking and engagement is acknowledged.</p> <p>The development of a dataset with existing cycle routes is underway; when this is finalised, it could be added to the online map and help identify gaps in the existing network.</p>	<p>Add the following commitments to the moving forward section:</p> <ul style="list-style-type: none"> • cross-boundary working • including further active travel routes
We support opportunities identified for "alongside the Lade" (pg.15) and the statement "provide appropriate connections with the existing Lade and River Almond routes" (pg. 16). However we suggest this is strengthened, and enhancement of the Lade greenspace and access is identified as a key green and blue route opportunity.	SNH	The Lade is identified as an existing resource, as well as an opportunity for further improvement on the online map. The integrity of the corridor is protected by LDP policy and the Council is currently preparing a Management Plan which will outline improvements to the Lade.	No change proposed by the Council.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
The SG does not state any specific requirement for development in or near an opportunity area to support (either through contributions or direct intervention) one of the opportunities identified. It would make the Guidance more effective if it stated requirements of development rather than an aspirational wish list.	TACTRAN	LDP2 was already at Examination stage when the revision of this guidance was undertaken. Therefore, additional opportunities that have been identified through data analysis and engagement could not inform the developer requirements in LDP2. Nevertheless, as the supplementary guidance is statutory and will form part of the LDP following approval by Scottish Ministers, developers will be required to consider these additional opportunities when preparing development proposals and submitting planning applications. It should also be noted that opportunities will not all be delivered through new development, there are other mechanisms for achieving these connections (see page 12).	No change proposed by the Council.
The requirements (including the maps within the online document) should be consistent with the LDP2 'Site Specific Developer Requirements' for development sites.	RP Planning		
There are some opportunities which are not included as developer contributions for specific allocations in the LDP. For example under 'Perth core villages,' the opportunity to link Bridge of Earn and Abernethy is not included. SNH refers to their comments on the Council's 'Developer Contributions and Affordable Housing draft SG' as a way of delivering some of these key links.	SNH	Developers will have to demonstrate that they considered the opportunities within and around the site and developed a proposal which maximises the potential benefits of GI to people and wildlife. The planning application stage will provide an opportunity to determine the ideal form of GI delivery in light of the analysis provided in this guidance and the detailed site work and studies undertaken by the developer.	
Objects to any change within the draft Supplementary Guidance document which alters the agreed position on Almond Valley.	Pilkington Trust	The representation does not provide any examples where the draft SG would be conflicting with the approved planning consent.	No change proposed by the Council.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
<p>Throughout the response, comments have been made on the acceptability and impact of developments such as Bertha Park, the Cross Tay Link Road. The respondent stated that the mitigation measures proposed for these developments are not adequate.</p> <p>North Inch is not a multifunctional open space area. Alongside the SuDS pond in Luncarty, they have poor management which limits benefits for wildlife.</p>	A member of the public	<p>The comments on the individual developments are noted and welcome.</p> <p>The Council agrees that in order to maximise the benefits of green infrastructure over time, good design and effective maintenance is crucial. As noted above, the new Open Space Guidance provides detailed advice on the design and maintenance of open spaces and promotes landscaping solutions that support biodiversity and does not require regular maintenance. The comments have also been forwarded to the Council's Greenspace team who is responsible for the planning and implementation of maintenance on Council owned public opens spaces.</p>	No change proposed by the Council.
9. Online Map			
SNH welcomes this locationally specific online map using an O.S. base and suggests a few improvements to aid developers on how to best use this.	SNH	<p>Comment is noted and welcomed. The online map should be viewed alongside the Guidance. Section 3 outlines how the guidance should be used and the case study under Section 6 shows how different elements of the guidance can inform developers. The online map contains information widget to direct users on how to navigate and use the map. Additional suggestions to this text are welcome.</p>	<p>Include the following text in the guidance:</p> <p>The Online Green/Blue infrastructure map is intended to be a dynamic map product. Newly available data will be reviewed regularly and added where deemed appropriate to Green/Blue infrastructure planning and as resources permit.</p>
The status of the "Green and Blue Infrastructure Map" and the method used for generating it is not specified and should be made clear. Will the map form part of the statutory SG? It's also unclear whether it is a dynamic document and	RP Planning	<p>The online map is a key part of the statutory SG and is referred to throughout the document.</p> <p>The method of generating the map is outlined in Appendix 1 of the guidance.</p>	

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
whether the maps within it are part of this consultation.			
10. Moving Forward			
Support the addition of 'Perth City Cycle network project routes' in particular, and the need for an Open Space Audit and Strategy. Recommends excluding 'woodland cemeteries' and including Local Nature Conservation Sites.	SNH	<p>Woodland cemeteries are going to be new burial areas, where trees will be planted instead of/alongside traditional graves. As such, they will form new green infrastructure and deliver benefits similar to other new woodlands.</p> <p>The Council does not currently have any Local Nature Conservation Sites. Surveys are due to start in 2020 to establish geodiversity and biodiversity sites and once these are established, the Council can review their role in terms of Green and Blue infrastructure and consider their inclusion in this guidance.</p>	<p>Include the following text in the guidance:</p> <p>The Online Green/Blue infrastructure map is intended to be a dynamic map product. Newly available data will be reviewed regularly and added where deemed appropriate to Green/Blue infrastructure planning and as resources permit.</p>
11. Appendix			
There is an omission at a strategic scale of paths and segregated cycle routes. There is reference to this under 'settlement scale potential green-space linkages' in the table but this seems to be incomplete and it is not clear what data has been used.	SNH	<p>Appendix 1 outlines path and cycle data used in existing (adopted paths, long distance routes) and potential linkages (Future Potential Routes/ Indicative Cycle Path (e.g. Perth to Dundee)</p> <p>PKC intends to update the map with active travel plan cycle routes as they become available</p>	No change proposed by the Council.

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant section/paragraph of Guidance			
		Existing and proposed Greenspace linkages (including paths and cycle ways have a scale threshold applied due to the detailed nature of the dataset. It is possible to zoom in to display these layers at a strategic scale	

Comments on Landscape draft supplementary guidance

Comment	Received From	PKC Officer Response	Change to be Made to Guidance
Relevant section/paragraph of Guidance			
GENERAL			
<p>Kinross Area LP included extensions to AGLVs to hill and river borders after community campaign. Involved in review panel but despite strong representation from Consultee, Cleish and Fossoway CCs, consultants excluded former AGLVs Cleish Hills and Devon Gorge from designation. Highly critical of consultant's exercise especially ignoring cross-boundary designations.</p> <p>Reporter's examination did not address need for local landscape areas to be protected against inappropriate development. Concerning as are now on highest capacity map for renewables. Question why necessary to review all designations if only two are being questioned. Question why internal staff cannot be used. Case is made for Cleish Hills and Devon Gorge to be reassessed.</p>	Councillor	<p>The depth of concern for recognition of the Cleish Hills and Devon Gorge is recognised. The explanation for the omission was largely set out in the committee report of 25 March 2015 to the Enterprise and Infrastructure Committee. This is summarised in <i>italics</i> to address the points raised by respondents:</p> <ul style="list-style-type: none"> - <i>These areas were carefully considered prior to completion of the report and long discussions were held between the Steering Group and the Consultants</i> <p>Devon Gorge :</p> <ul style="list-style-type: none"> - <i>the area is attractive and important geological feature but inappropriate to consider as a Local Landscape Area given its small scale compared to the other more extensive LLAs. Other similar sites in Perth and Kinross were also not designated for example Craighall Gorge, or Deil's Cauldron.</i> - It should be noted that Devon Gorge from Rumbling Bridge to Muckhart is being considered for selection as a local geodiversity site. - It should be noted that Clackmannanshire Council has not 	None
Strongly supports Cllr Barnacle's request to review LLAs in LDP2 or Supplementary Guidance. Critical of removal of designations from LDP2 and in past campaigned for inclusion of Devon Gorge and Cleish Hills in AGLVS. Community wish landscape protected against inappropriate	Fossoway & District Community Council		

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Relevant section/paragraph of Guidance			
development; worried that now seen as highly suitable for large scale wind farm development.		included the Devon Gorge on their side. Notwithstanding the discussion below of the Cleish Hills, the boundary with Clackmannanshire runs along the gorge from Rumbling Bridge to north of Blairingone. The Council would have little control over development on the north side of the gorge.	
Concerns over omissions of Cleish Hills and Rumbling Bridge Gorge; strongly support submissions of Cllr Barnacle and Kinross-shire Civic Trust. Cleish Hills meet assessment criteria for LLA; AGLV status confirmed local significance of landscape character of hills and basin, no reasoned explanation why not . Landscape designations differ on either side of county boundary. At consultation event in Feb 2016 mapping blotted out Cleish hills almost entirely demonstrating closed mind, flawed process requiring review.	Cleish & Blairadam CC	<p><i>Cleish Hills:</i></p> <ul style="list-style-type: none"> - <i>The Cleish Hills were considered as part of the Loch Leven Basin but the Cleish Hills did not score as highly as the 11 LLAs, particularly in terms of scenic quality, recreational value and cultural associations.</i> - Cross boundary designations were not ignored but an automatic designation across the border does not necessarily follow. Particularly given the view from one side of the hill range may differ significantly from the experience from the other. <i>Findings need to be consistent within the Council area. This was recognised by Fife Council.</i> 	
1.Concerned about omission of Cleish Hills and River Devon Gorge. No explanation given why LUC omitted. 2. KCT submitted full justification [see submission for full description]: Kinross-shire is natural bowl surrounded by Ochils, West Lomond, Bishop Hill, Benarty Hill and Cleish Hills, cannot separate Cleish Hills from others, contribute s much to character of Kinross-shire. Fife Council designates Cleish Hills as LLA.	Kinross-shire Civic Trust	<ul style="list-style-type: none"> - The history of planning applications over the last five years shows little threat to the Cleish Hills landscape although significant forestry is present which may be restructured, felled or thinned in the future. 	

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<p>3.Rumbling Bridge Gorge, Crook of Devon: dramatic box canyon in undulating countryside. Cannot say geography means no development can take place as gorge deserves a positive statement to protect from development. Suitable area needs to be marked surrounding gorge to protect from intruding and visual development.</p>		<p>In the consultants' brief the position of Areas of Great Landscape Value (AGLV) was set out noting that only 2 of the 6 Area Plans prior to LDP1 had AGLVs and they lacked information on their selection process or special qualities. To ensure a consistent and robust approach across the whole Council area it was necessary to avoid pre-formed assumptions to ensure consistent and thorough approach.</p> <p>The value of these features locally is recognised, expressly acknowledged by the consultants. The designation however refers to areas of significance to Perth & Kinross as a whole. For this reason any review necessarily requires a review of the process as it applies to all of the designations.</p> <p>Consultation maps that omitted the Cleish Hills were those showing the final designations arrived at from previous consultations. The public were invited early in the process to comment on maps of the whole Council area divided into squares. Analysis then proceeded on the basis of Landscape Character Areas before further defining the area through analysis and</p>	

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		<p>discussion with the steering group of stakeholders.</p> <p>Part of the Cleish Hills are identified as of low environmental sensitivity for wind farms in the draft Renewable and Low Carbon Energy guidance (Renewables SG); while half of the hills fall within an area identified as of significant protection. The wind map is a broad strategic document to inform a broad site search based on multiple criteria, not just landscape. All proposals will be subject to a site specific assessment against policies in the LDP and detailed guidance in the Renewables SG.</p> <p>An internal review carried out by Council staff would be at a cost to the Planning department and subject to capacity of the landscape staff.</p>	
Also request for Ochil Hills to be considered for regional park and extending Lomond hills Park to Loch Leven. Requests that Regional Park issues be looked at in Supplementary Guidance	Councillor	Regional parks have a remit wider than landscape and as such is not considered suitable for inclusion within this guidance. Regional parks come with a significant resource burden which is a decision for Council.	None
Welcome incorporation of objectives into body of document rather than as medium/long term ambitions in appendix	A member of the public	Noted	None

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LDP Policy 39 verbs reactive; look forward to development of proactive policies, initiatives and actions to promote development enhance contribute which LLA designation encourages. Look forward to co-ordinated and proactive programme of actions and process to achieve well thought out and ambitions objectives for Ochil Hills.	A member of the public	Planning policy is tied to the development plan process and as sets out issues developers need to address. Planning policy encourages appropriate proposals to protect and enhance the landscape through policy and guidance related to placemaking, woodland and forestry guidance, and renewables amongst others.	None
No comment to make	Coal Authority	Noted	None
Welcome that guidance takes into account draft Scottish Natural Heritage and Historic Environment Scotland revised guidance on local landscape designation. No further comments.	Historic Environment Scotland	Noted	None
3 POLICY CONTEXT			
3.4 LOCAL DEVELOPMENT PLAN			
Change policy 39 to reflect need to resist development in [incomplete]	Friends of the Ochils	Policy 39 is a policy in the local development plan recently adopted and cannot be changed here.	None

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5 GUIDELINES FOR THE LLAS			
Add to purpose assistance given to bodies who may wish to comment on developments such as wind farms and woodland planting. Not just for Council and land managers	Friends of the Ochils	Agreed that the guidance also allows interested bodies to provide informed comment on planning and other developments.	Amend second paragraph to read “Assistance to <i>developers</i> , the Council <i>and community bodies in (respectively) submitting, deciding and commenting on</i> planning. Assistance to the Council <i>and other bodies</i> in commenting on land management proposals (including proposals for forest and woodland planting) and monitoring landscape change.
Recommend forces for change sections for each LLA are checked to include any relevant changes since 2015.	SNH	As advised by SNH, planning applications and forestry grants reviewed, and discussed with DM officers. Changes in the renewables and forestry sectors most apparent; with wind farm and hydro applications drying up due to changes in subsidies, but with solar becoming economic. Also reviewed for wind farms that may be approaching consideration of repowering. Due to climate change there may be further changes to agricultural practice, tree planting, flood schemes and increased renewables but this will largely be dependent on national policy which at this stage is not clear. The financial environment for wind farms has currently halted the expansion of wind farms, but	Ochils : Amended per A Jamieson / FOTO comments below. Loch Leven Amend 2 nd bullet point to read “Wind turbines and solar farm proposals and associated infrastructure” Add additional bullet point “increase in naturalised wetland and woodlands” Amend final bullet point to replace Kinnesswood with Scotlandwell. Sidlaws Add expansion of existing forestry; Replace references to hydro with reference to solar farms and associated infrastructure.

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		given their potential impact, these have been kept in as a force for change.	<p>Glen Quaich Replace wind farm reference to extension or repowering of nearby wind farms; Remove reference to Beaully Denny powerline upgrade. Change reference re felling plantations to felling, thinning and restructuring of plantations.</p> <p>Loch Tay Remove “pressure” as increased tourist infrastructure around the Loch evident.;</p> <p>Ben Vrackie Change “footpath erosion” to footpath erosion and upgrading on popular ascents. Remove reference to hydro</p> <p>Loch Lyon, Sma’ Glen, Rannoch Forest, Strath Tay: No change</p>
5.9 SIDLAW HILLS			
Amend boundary of Sidlaws LLA to exclude area of Pitctstonhill (red hatched area). As land does not relate to description, statement of significance or special qualities of LLA. Boundary is not logical as it restricts southern expansion of Scone. LDP2 examination found area scored well in SEA so reasonable this area could come forward for development. Minor change, would provide a physical permanent boundary.	Scone Estates	This area is outside the settlement boundary and within the greenbelt. It would be inappropriate to remove the local landscape area here for the purpose of allowing expansion.	None

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Noted that “development pressures around the edge of Perth and Scone is a Force for Change. But development pressure is not synonymous with landscape impact . LLA designation must only be if landscape character itself of merit.			
5.10 OCHIL HILLS			
After 2 nd paragraph insert “The Ochils form a key watershed between the Tay and Forth river systems. It is subject to localised high rainfall which is increasingly being experienced as more frequent and intense events. In recent years some surrounding communities have been at risk of flooding and several sub-catchments are recognised as Potentially Vulnerable Zones for flood risk management.”	A member of the public	While a valid point this is not of direct relevance to the criteria for identifying Local Landscape Areas or the purposes of the designation set out in section 5.	None
1. To paragraph commencing “The landcover of the hills...” add “Much of the landscape of the Ochils, both open and enclosed, has been created and maintained by the farming of cattle and, particularly, sheep. This economy is now vulnerable, leading to changes in landcover.”	A member of the public	1. The cause of the landscape is not necessary to introduce in order to describe the landscape; any changes to the economy and its impact on landcover is a significant change to the guidance and would require further studies and consultation. This will be included in a later review.	None.

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2. Amend following paragraph to read: “Several upper glens have been dammed to form reservoirs, <i>which create significant features for landscape, biodiversity and recreation.</i> ...		2. The inclusion of the reservoirs in the statement of significance reflects their significance for landscape. Agreed that the reservoirs provide a resource for anglers and aquatic birds, however the recreational and biodiversity benefits of the Ochils are recognised across the area including through SSSIs.	
Amend 1 st bullet point of Special Qualities to read “prominent band of hills forming <i>both</i> a barrier and <i>a</i> gateway...”	A member of the public	Agreed that the suggested wording is clearer.	Amend first bullet point to read “Prominent band of hills forming <i>both</i> a barrier and <i>a</i> gateway between Perthshire and Kinross-shire, and the setting to both”
Add 2 initial bullet point to forces for change: “[1]• Changes to the landcover in response to the reduced viability of hill farming, including changing grazing patterns and vegetation cover. •[2A] Adaptations to improve resilience to climate change, including peatland restoration and Natural Flood Management processes. 2[B]. amend final bullet point under forces for change to read “...other tall structures and solar arrays” 3.Add final bullet point to forces for change : “• Increasing pressure from recreational access with the impacts of	A member of the public	1. changes to patterns of landcover from hill grazing pattern changing is a long term change best suited to be addressed through long term monitoring. There have been recent applications to increase forest and woodland cover in several areas which shows this may be an increasing change to be recognised in the landscape. 2A. peatland restoration and natural flood management may change the landscape, but we are not aware of any significant projects. 2B. Following publication of the Renewable and Low Carbon Energy guidance it is not expected that Wind Farms will continue to be a significant pressure although there	1. Amend 2 nd bullet point to include forestry. 2A. None 2B. Amend 3 rd bullet point to read “Development of single wind turbines and <i>repowering of</i> wind farms, as well as pylons, other tall structures and <i>solar farms and associated infrastructure.</i> 3 None

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<p>footpath erosion, irregular car-parking and litter</p> <p>To Forces for Change recognise: 1.changes to landcover in response to the diminishing viability of hill farming. In many areas this is giving rise to increased grant aided application for forestry, often based on the extensive planting of Sitka Spruce. 2[A].responses to climate agenda such as peat restoration projects rewilding project, in turn assisting natural flood management 3. increased recreational pressure giving rise to problems such as path erosion, litter, irregular car parking; extensive deer fence building.</p>	Friends of the Ochils	<p>may be proposals to repower existing wind farms. Small solar arrays are low profile and will not have a major landscape impact. Large Solar farms however may do and are an increasing possibility. The Renewables SG does identify parts of the Ochils as being of low sensitivity to solar farms, and although the associated guidance requires solar farms to avoid any significant effects on LLAs they are a potential force for change with a previous application approved and initiated in the Ochils indicating feasibility.</p> <p>3. footpath erosion may lead to a visible change to the landscape as paths broaden. The extent of recreational pressure however has not been quantified and is best placed as part of the monitoring programme. Irregular car-parking and litter are not significant on a landscape scale.</p>	

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<p>1. Add 2 initial objectives :</p> <ul style="list-style-type: none"> Support the diversification of the hill farming economy and facilitate access to funding for landscape conservation, biodiversity, recreation and tourism. Support measures to mitigate climate change through peatland restoration and Natural Flood Management. <p>2. Amend 2nd (now 4th) objective to read: "...masts, wind turbines <i>and solar arrays</i>"</p> <p>3. Add final objective "• Enhance understanding of the special qualities of the area through interpretation and education."</p>	A member of the public	<p>1A. Supporting the hill-farming economy or providing access to funding is not a function that can be provided through planning guidance.</p> <p>1B. It is not clear that there is a need for natural flood management to improve the landscape here; however the area does have a number of patches of peatland concentrated on the western edge of the designation. While locally important these areas do not form a significant part of the landscape when compared with other areas across the council area.</p> <p>2. As noted above there is potential for large solar farms to have an impact in the Ochils, and reflects developments in renewables since the original study.</p> <p>3. The objectives here are specific to the landscape in question. Promoting education of special qualities is an important aspect and is included in the overall objectives in section 8.</p> <p>4. Deer fencing can have visual impact where new planting of forestry occurs but diminishes as a landscape factor as woodland grows.</p>	<p>1. None</p> <p>2. Amend 2nd bullet point to read "...masts, wind turbines <i>and solar farms</i>"</p> <p>3. None</p> <p>4. None</p>
<p>1. Add objective linked to changes to economies of hill farming and forestry which improve access and landscape, biodiversity to enhance enjoyment of the hill range by visitors and linked economic benefits.</p> <p>4. Address negative aspects of deer fencing.</p>	Friends of the Ochils		

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<p>5.10</p> <p>Objectives: Concern re first bullet point as currently planting of Sitka spruce dominates, would like to see greater emphasis on rewilding of the hills. Therefore examples of “appropriate species” would be helpful</p>	Friends of the Ochils	Agreed that the landscape would benefit from more natural woodlands. Appropriate species was added at the request of Forest Commission Scotland during the previous consultation. Other pressures on the area include to increase forestry and woodland to combat climate change and recent proposals include mixed broadleaf and conifer proposals. The UK Forestry Standard contains guidance for landscape and biodiversity and reference to this will help ensure a balanced approach.	Add “consistent with the UK Forestry Standard” after each mention of appropriate species
<p>Objectives: Concern re 2nd bullet point (re ensure particular care in siting of masts and turbines). Ochils have reached limit based on cumulative impact. Objective should be more concerned with protection of hill range from further windfarm development.</p>	Friends of the Ochils	The Spatial Framework for Wind sets out the national tests where wind turbines may be acceptable. There can therefore be no blanket ban on windfarm development here. Local Landscape Areas however are identified in the Renewable and low Carbon Energy guidance as being particularly sensitive and where adverse impacts should be avoided. This could be reflected better in the text.	Amend bullet point to read “proposals for turbines and masts should not have an adverse impact on the special qualities of this sensitive environment”
<p>Support objective re historic features, would also like objective for protection of priority habitats and species.</p>	Friends of Ochils	There are some priority habitats in the Ochils such as Glenquey Moss (a candidate local biodiversity site), and several small SSSIs including Glen Queich SSSI and Bog Wood and a 60ha SAC Pitkeathly Mires, with some woodland restoration taking place in Glen Devon. These do not form a large part of the significance of the site.	None.

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		Historic features in the designation are primarily hill forts, country castles and houses that are more prominent in the landscape and do not form part of the special qualities of the whole area that would require an objective.	
5.11 LOMOND HILLS			
Additional objective requested: “maintain and enhance the water quality of Loch Leven.” As quality of water in loch under threat from expansion of housing the catchment area reflected in algal blooms.	Portmoak Community Council	Enhancing the water quality in Loch Leven is addressed by policy 46 and associated guidance with limited relevance for landscape to justify duplication here.	None.
6 WILD LAND AREAS AND WILDNESS			
SG should note that 2017WLA guidance is draft only ; amend to “In order to avoid or minimise significant adverse effects, Wild Land Areas should be considered at an early stage of project development. The SNH <i>draft</i> technical guidance, Assessing Impacts on Wild Land Areas (2017) should be used to assess potential effects.” Include link to website.	SNH	Agreed	Amend per comment. Provide Link to guidance.
Clarify what is meant meant by wildness being ‘considered differently’ in paragraph on national scenic areas	SNH	The statement is intended to refer applicants to the quality being set out in National Scenic Area statements. This could be rephrased for clarity.	Amend the paragraph under the heading of National Scenic Areas to read “The wildness characteristics of National Scenic Areas are set out in SNH’s Special Qualities Reports” ...

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7 SUPPLEMENTARY PLANNING STATEMENTS			
Welcome the supplementary planning statements especially statement 3. Look forward to assisting in identifying areas where conservation and enhancement can be made within the Ochil Hills LLA	A member of the public	Noted.	None
Wording of supplementary planning statements not clear enough. Wording should be clarified with emphasis on protecting LLAs rather than on development	Friends of the Ochils	Local Landscape Areas do not have a statutory level designation and cannot be a blanket ban on development. The Guidance therefore is intended to promote responsible development and ensure that the special qualities of the landscapes are taken into account.	None
8 OBJECTIVES			
Wary of promoting LLA brand as could be exploited to support incompatible development	Friends of the Ochils	Promotion of the brand is supported to raise awareness of the special qualities of the landscapes, thereby promoting better development rather than incompatible development.	None
9 MONITORING			
Welcome emphasis on monitoring. Ask who will carry out given required resource. Request results available to interested parties.	Friends of the Ochils	Monitoring will be carried out by Council in conjunction with SNH. Results will be publically available.	None