



Helping Protect, Conserve and Develop a Better Built and Natural Environment

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25th January 2018.

Local Development Plans team
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Dear Sirs

PROPOSED LOCAL DEVELOPMENT PLAN 2017

Kinross-shire Civic Trust would wish to comment on the Proposed Local Development Plan 2017 as follows.

Policies

Policy 1D Placemaking.

There is a concern with regard to the policy of defining the range of houses that will be permitted on a particular site. There should be a clear distinction between rural developments and urban/suburban developments. The Draft Placemaking guide goes partially towards that but not nearly enough. Argyll and Bute Council's excellent Sustainable Design Guidance makes clear distinction between Small Scale Housing Development, Large Scale Housing Development and working with the Built Heritage. These are very important considerations and will be dealt with in more detail in comments on Housing in the Countryside

Policy 2 Design Statements.

The opening statement is weak in that it says "Design Statements will *normally* need to accompany... The word '**normally**' should be deleted and then the opening sentence is much more definite and positive and leaves no room for debate.

Policy 6 Settlement Boundaries.

The Policy introduces exceptions to the Settlement Boundaries, which introduce a weakness in the Policy and allow an opportunity for 'interpretation' which should not be permitted.

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Again, there is no distinction between rural and urban settlement boundaries which are very important and these differences should be treated as separate issues. These 'exceptions' should be eliminated from this Policy as they are covered by other policies.

Policy 19 Housing in the Countryside.

The current Policy on Housing in the Countryside has singularly failed to be interpreted properly. The result in Kinross-shire is that there a number of developments which have produced housing schemes, which are high value, very dense, large executive villas which have no place in a rural setting and make no pretence of fitting into that setting. They are aimed at a top of the market which make no sociological sense in a rural situation and they are contrary to the Sustainable Policy defined in the Strategic Policy in that they will likely encourage long distance commuting as well as additional services generated by internet buying.

The resulting architecture is very banal and uninspiring and obviously is generated by computer to keep costs to a minimum and benefiting from the economies of scale which this approach produces.

This argument could equally be applied to much of the new housing that is being built in Kinross-shire.

Housing in the Countryside, particularly in Kinross-shire which has so many Special Landscape Areas, has to recognise and be appropriate to the landscape situation. Reference has already been made to the excellent **Argyll and Bute Council Sustainable Design Guide** which is divided into 4 sections, **Topic 1** – Small Scale Housing Development, **Topic 2** – Large Scale Housing Development, **Topic 3** - Working with Argyll and Bute's Built Heritage and **Topic 4** – Case Studies - Sustainable Materials and Technologies.

These Topics graphically show and describe a variety of situations of rural and urban situations and illustrate the difference between correct and improper design solutions.

The Trust feels very strongly that a more robust policy has to be adopted in order that future housing in the countryside reflects its rural situation and should reflect appropriate situations with a mix of housing and not just create more and more dormitory suburbs in the country which do nothing for the community.

Policy 27B Demolition of Listed Buildings.

The Trust is very concerned that opportunities are being offered for Listed Buildings to be demolished. In particular, P27B(a) invites applicants to demonstrate that their listed building is, in fact, of no interest. The only way that this should be achieved is by a formal de-listing issued by HES, in which case the whole section is anyway inapplicable. The state, guided by its own experts, has already decided that the building **is** of special interest. So, while, exceptionally, there may be sound reasons for the council to decide that a listed building can or should be demolished (paras b, c d), the idea that it is "not interesting" cannot be stated to be one of them.

Listed Buildings are an important part of the Heritage. Far too many buildings are being allowed to deteriorate to the state that a developer can have a structural engineer declare them to be structurally unsound and therefore they should be demolished and a new building

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recreated in its place. More protection must be put in place to protect these buildings and a robust policy established that the buildings are retained.

Policy 28 Conservation Areas.

The above comments on Policy 27 equally apply to the demolish to buildings within Conservation Areas. It is not only Listed Buildings which are important to the character and nature of Conservation Areas and there are a number of situations and buildings within Kinross-shire where buildings are simply being allowed to decay.

OTHER ISSUES

Landscape Guidance

Although this is not part of the LDP2 it is referred to and the Trust is very concerned that there are elements of the current Landscape Guidance Policy which do not reflect the situation in Kinross-shire. In particular the Trust continues to object to the fact that the Special Landscape Area definition has not been applied to the Cleish Hills and the River Devon Gorge. The Trust submitted a **Report** (KCT letter dated 11th January 2015 Ref 150111 Landscape Guidance Response) to the Council which clearly demonstrated that the definitions that were used to create SLAs throughout Perth and Kinross obviously applied to the Cleish Hills and Devon Gorge. This was particularly relevant when Fife Council created the south faces of the Cleish Hills as a SLA.

Conservation Areas

In recent years the Trust submitted a **Report** (KCT Ref. 141107 Milnathort CA Final amended - Kinross-shire Civic Trust - MILNATHORT - Proposal for a Conservation Area) proposing that a Conservation Area be created in Milnathort. The Trust is still of this opinion and it is part of Scottish Government current policy that local authorities have an obligation to regularly look at areas within its boundaries and consider whether specific sites are worthy of becoming Conservation Areas. Milnathort centre is a very historic part of the County and it is vital to its conservation that consideration to its being created a Conservation Area.

Rejected proposed development sites for Housing and Commercial uses

LDP2 MIR Appendix 3 Table of Pre MIR sites and reasons for not being taken forward. The Trust supports the rejection of sites Kinross 1, 2, 3, 4 and 5, Milnathort 1, 2 and 3 and Balado 1, 2 and 3, as stated in the document. The Trust particularly supports that additional land is needed for housing as pressure on the Kinross-shire Infrastructure must be approaching a critical point. The granting of permission to Persimmon Homes for the construction of 393 new dwellings will already put pressure on such elements as the Kinross Health Centre and the new Kinross High School, which is already nearing capacity.

Yours faithfully

Alistair Smith, Chairman

For and on behalf of Kinross-shire Civic Trust Cc Local Cllrs

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