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| MAB/LJC 19 January 2015  Graham Esson  Team Leader (Sustainability, Policy & Research)  Planning and Regeneration  The Environment Service  Perth & Kinross Council  Pullar House  35 Kinnoull Street  PERTH  PH1 5GD | The Atrium  137 Glover Street  Perth  PH2 0JB  Tel: 01738 475000    Email: [mbarnacle@pkc.gov.uk](mailto:mbarnacle@pkc.gov.uk)  [www.pkc.gov.uk](http://www.pkc.gov.uk)  Moorend  Walkmill  Crook of Devon  KINROSS  KY13 0UZ  Tel: 01577 840516  **An Independent Councillor** | Councillor Michael Barnacle |

Dear Graham

**Special Landscape Areas – Draft Supplementary Guidance**

I refer to your email of 2/12/14 re the above, seeking views on the consultant’s report by 19th instant. I will restrict my comments to the proposals that impact on Kinross-shire Ward.

You may recall the enclosed article I wrote for Rural Scotland’s Spring 2014 Newsletter (Page 4) that also appeared in the May 2014 edition of Kinross CC’s Newsletter. This charted the Kinross-shire experience on landscape designation since 2000; in particular the hard-fought successful campaign to extend the Areas of Great Landscape Value (AGLV’s) to the shire’s hill and river borders in the Local Plan 2004, the loss of them in PKC’s Local Development Plan (LDP) adopted 3rd February 2014, due to a change in Scottish Government Planning Policy and the ‘policy gap’ before supplementary guidance is produced on what is to replace them.

I noted a Review of Local Landscape Designations at PKC was to be undertaken, with consultants having been appointed and sought participation.

I have since attended three meetings of the Review Panel, comprising PKC councillors (I represented APRS and Kinross-shire), community councils (Cleish, Fossoway & Glenfarg from Kinross-shire ward), environmental organisations (Friends of the Ochils, John Muir Trust, etc.)

On 14th August 2014, I attended the evening workshop for PKC councillors (4 only present) at which the consultants final report was produced and at which it was decided to circulate all councillors with prior to this final public consultation.

The LLA’s proposed for Kinross-shire are Lochleven, Ochil Hills and Portmoak which I fully support. Despite strong representation from myself, Cleish & Fossoway CC’s within the Review Panel, the consultants have excluded from designation the former AGLV’s of the Cleish Hills and the River Devon and its gorge. I believe this is a major omission and seek a change to the proposals to include these omitted areas. An examination of the 10 evaluation criteria used by the consultants for designating LLA’s is necessary to see what landscape

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characteristics these excluded areas possess that justify designation. The criteria are landscapes which:

1. make a positive contribution to the wider **identity, image and sense of place** of Perth and Kinross.

2. are **rare or unique** landscapes

3. are **well managed** and in a good state of repair

4. feel **wild or remote**

5. have strong **scenic qualities**

6. are important for **recreation and tourism**

7. have a strong **historic character** or important cultural or spiritual associations

8. have important **natural features and habitats**

9. form part of the **setting of towns and villages**

10. have important **views, viewpoints or land marks**

I suggest that Cleish Hills meet at least six of the above and it is worth noting that Fife Council’s LLA’s border the PKC boundary here and cross boundary designations were raised in the Review Panel but have been ignored here.

As regards the River Devon and its gorge, it should be remembered that the Reporter to the Local Plan public enquiry in 2003 regarded this area as of outstanding quality that merited inclusion as an AGLV, especially as the river flows out of the Ochil Hills designated area. I suggest that the river and its gorge meet at least eight of the above and I note the strong historic character and important cultural association of the Devon with Robert Burns’ song ‘The banks of the Devon’; conversely, in supporting an LLA in the Aberfeldy area, the consultants quote Burns’ song ‘The Birks of Aberfeldy’.

I note that Muckhart Community Council and Clackmannanshire Council are discussing the merits of designating the Devon Gorge as an SLA.

I would commend the submissions of Fossoway Community Council and Kinross-shire Civic Trust as regards the Devon Gorge and Cleish Hills respectively.

I would also cite the excellent submission from Friends of the Ochils to your consultation, noting particularly their support for the inclusion of these omitted areas as SLA’s.

In summary, I am extremely disappointed that the final consultant’s report has ignored review panel representation on the Cleish Hills and the River Devon/Gorge when selecting their proposed LLA’s and seek to ensure that PKC and its elected members change these proposals and include these areas as LLA’s within the supplementary guidance for our recently adopted LDP.

Yours sincerely,



Cllr Michael Barnacle

Independent Member for Kinross-shire

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PS Please let me know if you wish any further clarification on the criteria that I feel are met by the omitted areas.

cc Glenfarg & Kinross-shire CCs

Kinross-shire Civic Trust

Friends of the Ochils

Rural Scotland (APRS)

Councillors Cuthbert, Giacopazzi and Robertson