# **Document Name: Proposed Plan and Draft Action Programme**

#### Page and Site / Policy Reference No.:

- **Proposed Plan**: page 50; site reference Callander LT2: Claish Farm Housing [100] and Visitor Experience
- **Draft Action Programme**: site reference Callander LT2 Mixed Use

# Please indicate here any aspect of the document you support:

# **Change in document requested:**

Removal of indicative housing number from allocation in Proposed Plan; inclusion of Historic Environment Scotland as stakeholder in relevant Action Programme entry.

#### Reason or justification for change requested or statement of support:

This proposed long term development site contains four scheduled monuments within its boundaries:

SM 6968 Claish Farm, palisaded enclosures and timber hall

http://s0618a/hes/app/f?p=1000:viewlocation:33340663885861::NO::P215\_LOCATION:200058995

SM 6966 The Clash, palisaded enclosure

http://s0618a/hes/app/f?p=1000:viewlocation:5239684968183::NO::P215\_LOCATION:20005903\_4

SM 6967 The Clash, enclosure

http://s0618a/hes/app/f?p=1000:viewlocation:11219746467935::NO::P215\_LOCATION:200058923

SM 6972 Lots of Callander, palisaded enclosures

http://s0618a/hes/app/f?p=1000:viewlocation:16470119038232::NO::P215\_LOCATION:200059054

These cropmark sites are of national importance for their potential to contribute to our understanding of prehistoric settlement and economy. Their importance is greatly enhanced by their proximity and relationship with one another as potentially contemporary sites. The scheduled monuments, and the area between them, occupy a significant proportion of the proposed long term development allocation site.

At several stages in the LDP consultation process we have indicated our concerns regarding potential negative impacts on the four scheduled monuments through development in this area. The Proposed Plan has introduced a specific indicative capacity (of 100 homes and visitor experience) for the site.

Whilst we consider that there is scope for some development in this location, we consider it very unlikely that the level of development indicated by the Proposed Plan could be delivered on this site without an adverse impact on the scheduled monuments. This view is supported by the findings of the strategic environmental assessment for this site, which identifies potential significant negative effects for the historic environment.

The Scottish Governments' policy for the historic environment is set out in Scottish Planning Policy (SPP) at paragraphs 135 - 151. Paragraph 145 deals with scheduled monuments and states that 'where there is potential for a proposed development to have an adverse impact on a scheduled monument, or the integrity of its setting, permission should only be granted where there are exceptional circumstances.'

There have been no exceptional circumstances demonstrated in the Proposed Plan which would outweigh national planning policy for the historic environment, to justify development at a scale which is likely to have adverse impacts on the scheduled monuments within the site.

We therefore request that an indicative capacity is not quantified in the LDP, to ensure that there is flexibility to achieve an appropriate, deliverable level of development without adverse impact on the historic environment. Secondly, as sensitive design will be required to ensure the protection of the scheduled monuments and their setting, we request that the Action Programme names Historic Environment Scotland as a stakeholder in relation to this site, to ensure early and effective consultation.