How often do we get a chance to really understand the future of where we live, work, play and invest?

That’s what LIVE Park is all about – looking at what development is needed across the 22 towns and villages in Loch Lomond & The Trossachs National Park – from housing to jobs, and everything in between, so get involved at

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The document you’re holding right now is the result – our Main Issues Report.

Inside, you’ll find our ideas based on what you told us. That could mean attracting more young families to the area, developing our tourism offering, or supporting improvements to our infrastructure like roads and visitor facilities.

And now it’s about finding out what you think, so get involved.
Living
Investing
Visiting
Experiencing
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bold.
balanced.
better.
introduction and overview

WHAT’S THE BIG IDEA?
This report is all about the **big ideas** for future development in the National Park over the next 20 years. Where new homes should go, where new and existing businesses will be supported and where the environment should be protected.

It shows the development that we think is needed in order to support our communities, visitors and local economy while ensuring the ongoing conservation and enjoyment of the area’s outstanding environment.

To help establish this we have listened to many people in the National Park. We have spent time talking and listening to our communities, we have met with key government agencies, partner organisations, businesses and landowners throughout 2013. Research has also been undertaken into key development issues such as housing, economic development and tourism.

This is drawn together in this Main Issues Report – to outline what we think are the likely main changes required from the Local Plan, the potential solutions and the options for new development.

Our Local Plan, which has been in place since December 2011, is the basis for deciding where new homes, businesses, visitor accommodation etc should go in the National Park. It is a key document in attracting the right new development in the right place. We must ensure it is up to date.

This is your opportunity to tell us what you think before we prepare the new Local Development Plan.
The number of new homes and businesses being built has been very low in recent years overall, and this is a trend throughout Scotland. It is important to consider where our current approach to supporting new development could be amended to help the National Park’s communities and businesses. We focus on the Rural Economy, Housing and Visitor Experience to explore what new options may be available. (Section 4.3)

The natural, built and cultural environment, including the Park’s landscape, is the very reason that the National Park was designated. We feel the policies in our Local Plan that guide new development in relation to these topics do not need to be changed. (Section 3)

Infrastructure and Services are key for our communities and visitors. These affect how we move about on the roads, paths and public transport, where our children can go to school, and where our visitors go. Feedback from communities and businesses confirms the importance of these points. (Section 4)
Turning to the Park’s Towns and Villages, the main areas where additional land is identified are Callander and to a lesser extent in the Arrochar, Tarbet and Succoth area. New land is proposed for housing and existing or additional land is shown for tourism or economic development. Significant existing land for both tourism and housing in Balloch remains and is proposed to be continued. (Section 5)

Development in these locations we feel, will provide sustainable growth over the longer term – an increase in employment opportunities with new homes that can facilitate improvements in services and infrastructure as development is implemented.

The same principles have been applied when reviewing sites in other towns and villages, with the purpose of ensuring there is enough land for housing between 2016 and 2026 but also to provide a range of options for both housing, economic development and tourism development.

Additional new smaller sites are also identified in:

- Aberfoyle
- Crianlarich
- Drymen
- Gartocharn
- Luss
- Balmaha
1.3 HOW CAN I SHARE WHAT I THINK?

We think it is important to provide a range of ways for all to get information on what this consultation is about, what it means, why it is important and how you can share what you think.

The consultation runs from Monday the 28 April until Monday 7 July. Any comments must be submitted to us by 5pm on 7 July and we are providing a range of ways for you to provide this to us.

You can access information on the Main Issues Report:

- By going online at ourlivepark.com
- By visiting your local library
- On twitter and facebook – you can see up to date information on what people are saying twitter.com/ourlivepark facebook.com/ourlivepark
- Visit the displays in the 3 Villages Hall in Arrochar and Callander Youth Project
- View our very short Youtube summary videos
- Visit us in person at National Park HQ or at a community meeting/workshop (you can view a list of these on the ourlivepark.com)
- Attend a Youth Visioning event - details are on ourlivepark.com
- Calling 01389 722600 and ask for Hugh, Susan, Thom or Stuart in the Forward Planning Team
- Send us an email - livepark@lochlomond-trossachs.org
- See the posters in local shops, schools and community newspapers
- Look out for updates on your Community Notice Boards for any local event!
There are a range of ways to provide your views on the Main Issues Report:

- Going online at ourlivepark.com complete an online response or leave a comment
- Leave your comments* on twitter and facebook twitter.com/ourlivepark facebook.com/ourlivepark
- Text your comments* to 07860 01 71 53
- Visit us in person at National Park HQ or at a community meeting/workshop (you can view a list of these on the ourlivepark.com)
- Attend a Youth Visioning events in Callander and Arrochar
- Calling 01389 722600 and ask for Hugh, Susan, Thom or Stuart in the Forward Planning Team
- Send us an email or post a completed MIR response form to us at: hello@livepark.com

Loch Lomond & The Trossachs National Park Headquarters, Carrochan, Carrochan Road, Balloch, G83 8EG

CONNECT & SHARE WITH US...
1.4 WHY PLAN?

Planning is all about guiding new development in the Park while safeguarding, and enhancing, the environment. We prepare a plan to show where, and what type of future development will be supported.

This is used as the basis for deciding planning applications for development and use of land. We have a statutory duty to prepare a development plan and the strategy and policies contained within this are key to securing delivery of the National Park’s four statutory aims.

Scotland’s National Parks share four aims set out by Parliament:

- To conserve and enhance the natural and cultural heritage of the area;
- To promote sustainable use of the natural resources of the area;
- To promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public;
- To promote sustainable economic and social development of the area’s communities.

We must update our plan regularly (every 5 years) so that it is kept up to date and is responsive to change.

The current Local Plan covers the period from 2010 to 2015.

The new Local Development Plan (LDP) will replace the current Local Plan and will cover the period from 2016 to 2021. It will have a different format from the current Local Plan (due to changes in legislation) however the purpose and use of the LDP remains the same. While it has a lifespan of 5 years it will focus on the main development proposals for the next 10 years and also give an indication of where we think future development, and the likely scale of this, should be located as far as 20 years ahead.
working as one
national park partnership plan

HOW IT FITS...
The National Park Partnership Plan sets out the priorities and key outcomes for the Park for all partners to 2017.

A key difference in planning within a National Park is that we must ensure that the Park’s four statutory aims are achieved collectively, and in so doing work with all public bodies to ensure their activities deliver these priorities.
In addition to being the basis for guiding new development, the Local Development Plan is the key development enabling tool that the Park Authority has.

It can influence investment in infrastructure and services. The Outcomes identified in the National Park Partnership Plan are:

**Conservation:** An internationally – renowned landscape where the natural beauty, ecology and the cultural heritage are positively managed and enhanced for future generations.

**Visitor Experience:** A high quality, authentic experience for visitors, with many opportunities to appreciate and enjoy the natural and cultural heritage – within an internationally renowned landscape that compares to the best on offer around the world.

**Rural Development:** In the National Park businesses and communities thrive and people live and work sustainably in a high quality environment.

It is proposed that these form the Vision for the Local Development Plan.
2.2 DELIVERING THE NATIONAL PARK PARTNERSHIP PLAN

The Partnership Plan outlines key challenges for each outcome, along with policies and delivery priorities.

The policies are particularly important in preparing the Local Development Plan and set the strategic framework to shape any revisions or updates to strategy and policy.

The key policy provision is the Spatial Development Strategy, with which the Local Development Plan should be consistent. The approach in the current Local Plan is consistent with this Strategy and it is not proposed to be significantly amended. Where possible changes are identified, these are outlined in the Rural Economy, Housing and Visitor Experience sections.
current planning policy

THE LOCAL PLAN

3
3.1 STRATEGY SUMMARY

The current Local Plan provided the first single planning strategy and framework of policies for the National Park.

Its overall vision was to provide:

“A robust development and land-use planning framework to 2015 that will deliver high quality, sustainable development in an area of outstanding landscape and environmental quality.

New development will contribute to the Park’s special qualities, directly supporting the social and economic development of the Park’s communities and a growing rural economy, contributing to Scotland’s prosperity, improving the range and quality of opportunities to experience the National Park, and enhancing its standing as an international visitor destination.”
Monitoring of the Local Plan has been carried out by reviewing how we have used the policies in making decisions on new development since December 2011.

This is critical to understanding progress in achieving the aims and vision. It also helps us to consider what our main issues might be as it can highlight which sections of the Plan need to be updated to respond to changes in external influences.

The National Park Authority’s 2013 Monitoring Statement, published separately, is a comprehensive record of how the Development Plan has performed in achieving the vision above. We have summarised the content of that report here. Later in this document we will explore the trends behind this information.

The National Park Authority determined 611 planning applications between 13 December, 2011 and 31st December 2013. 11 applications have been refused and 46 have been withdrawn. The applications* can be split into the categories associated with the Local Plan strategies:

- **Environment**
  - 436 applications

- **Housing**
  - 316 applications

- **Economic Development**
  - 74 applications

- **Sustainable Tourism and Recreation**
  - 139 applications

- **Transport infrastructure**
  - 91 applications

- **Sustainable Communities**
  - 76 applications

(*Please note that applications can fall into more than one category, for example a housing application can have environmental aspects to be considered)
The key points from the monitoring include:

- In the Local Plan, we allocated suitable sites for development. The majority of these sites remain undeveloped.
- In terms of housing, 25 of the 29 allocated sites have yet to be developed, as building rates have declined since the Local Plan process began in 2009. Economic and Sustainable Tourism sites show a similar picture with some notable exceptions. Windfall sites are providing the large share of development activity in the Park.
- However, some key sites in the Park have seen encouraging progress, with the largest housing site in the Park, Tannochbrae, in Callander being completed and the approval of the 130 bed hotel and associated development at the former torpedo range near Arrochar gaining planning permission in 2013.
- The environmental/built heritage policies are working well, ensuring that development being approved and built is safeguarding and enhancing the environment.
- Renewable Energy and other sustainable community related development has been more positive – with a number of schemes going ahead, which has been a boost to many areas of the Park.
- Key transport projects in the Park are planned on the A82 at Tarbet to Arduli and in Crianlarich which will increase connectivity and improve journey times.
- While there has been an increase in vacant retail and commercial properties in our town and village centres, these have been in the minority.
For full details please refer to the Monitoring Statement. From this, it is considered that the following are the key policy and strategy areas that need to be reviewed:

- Housing and affordable housing policies/requirements
- Economic development policies
- Tourism development strategy and policies

Having considered the elements that need to be reviewed, the next sections turn to identify the issues and places capable of being the focus in this Main Issues Report.
listening for the future
identifying the main issues

WHAT NEEDS MAJOR CHANGE AND WHAT ARE THE OPTIONS?
4.1

DRIVERS FOR CHANGE

Previous sections explain the context within which the planning system operates in the National Park and show recent development trends.

This provided evidence on the performance of the Local Plan, however they only measure the actual development taking place and not the underlying reasons or issues. They also don’t tell us the potential future issues that we may need to consider.

To build up a full current picture, we have:

- Invited the submission of comments, issues and land suitable for development
- Listened to the views of the Park’s communities, businesses, landowners, councils and partner organisations through meetings, charrettes, workshops and household/business questionnaires
- Undertaken research into housing, retailing, economic development and 2011 census
- Reviewed new legislation, emerging policies or strategies from local and national government

The following section provides a short summary of the headlines identified from this review.
COMMUNITY AND PARTNER ENGAGEMENT

In terms of community engagement, the following is a summary of key points we heard during our programme during 2013:

- Callander’s aspiration to be an outdoor capital of the National Park, with long term growth favoured to the south to accommodate development to support new investment in facilities, services and accommodation.
- The significant potential economic benefits and opportunities from the Ben Arthur resort development in the Arrochar area.
- Tourism or visitor development should not be to the detriment of the character of towns and villages, but new development is needed in Aberfoyle, Tyndrum, Blairmore, Arrochar, and Succoth. Where this can complement social enterprise aspirations of these communities this is particularly supported.
- Basic infrastructure, such as roads, car parks, sport/leisure facilities, primary schools, health care, community halls and broadband are essential to community life and supporting the visitor economy.
- Evidence of businesses struggling – increase in vacant commercial, particularly retail, premises.
- New housing is needed to ensure that young people and working families can stay – and perhaps a more pressing reason is that they can afford to move to the National Park. The amount of housing should relate to the need and employment opportunities. There is more pressure/demand on the south and Callander given the accessibility to the central belt and its wider employment opportunities.

Basic infrastructure, such as roads, car parks, sport/leisure facilities, primary schools, health care, community halls and broadband are essential to community life and supporting the visitor economy.

Evidence of businesses struggling – increase in vacant commercial, particularly retail, premises.

New housing is needed to ensure that young people and working families can stay – and perhaps a more pressing reason is that they can afford to move to the National Park. The amount of housing should relate to the need and employment opportunities. There is more pressure/demand on the south and Callander given the accessibility to the central belt and its wider employment opportunities.
The following are proposed to be our overarching themes in the Local Development Plan.

While they have implications for the National Park or relate to an outcome we would like to achieve, they require a broad range of action that relates to a number of areas of development.

PLACEMAKING

Achieving good design is now central to planning which is about creating successful places. This should be a collaborative process with a focus on the following six qualities for places to be:

- Distinctive
- Welcoming
- Adaptable
- Resource Efficient
- Safe and Pleasant
- Easy to Move around and Beyond

These should be reflected in planning strategies, policies and decisions and be promoted through a variety of tools such as, Design Guides, Masterplans and Development Briefs. It is proposed that this is an overarching theme throughout the next Local Development Plan to which all policies and proposals contribute.
POPULATION CHANGE

Ageing population is an established national issue, however long term projections anticipate that this will be particularly acute in the National Park, combined with an 11% reduction in population. When the current Local Plan was drafted the population was predicted to decline by between 5 and 10% (2006 and 2008 based population projections by National Records of Scotland). However, as the table below highlights, more recent projections show a worsening situation.

Table 1: GRO Midyear estimates
% Population change (2010 - 2035)

The key points over the projection period are:

- The population of the National Park is projected to fall from 14,480 to 12,820 (a decrease of 11%)
- The number of children aged under 16 is projected to decrease by 29% from 2,130 in 2010 to 1,520 in 2035
- The number of people of working age is projected to decrease by 23% from 8,590 in 2010 to 6,630 in 2035
- The population of pensionable age is expected to increase by 24% from 3,760 in 2010 to 4,670 in 2035
Analysis of the 2011 census provides the following update. The population of the Park has declined slightly since 2001, while Scotland as a whole has increased slightly. Both these trends are projected to continue. As the table below highlights, there is a wide variation in the local authority areas that include the Park's area.

<table>
<thead>
<tr>
<th>Usual resident population</th>
<th>2001</th>
<th>2011</th>
<th>% Population change (2001 to 2011)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Loch Lomond &amp; The Trossachs National Park</td>
<td>15,600</td>
<td>15,168</td>
<td>-2.85</td>
</tr>
<tr>
<td>Scotland</td>
<td>5,062,011</td>
<td>5,295,403</td>
<td>+4.41</td>
</tr>
<tr>
<td>Stirling</td>
<td>86,212</td>
<td>90,247</td>
<td>+4.47</td>
</tr>
<tr>
<td>Argyll &amp; Bute</td>
<td>91,306</td>
<td>88,166</td>
<td>-3.56</td>
</tr>
<tr>
<td>West Dunbartonshire</td>
<td>93,378</td>
<td>90,720</td>
<td>-2.93</td>
</tr>
<tr>
<td>Perth &amp; Kinross</td>
<td>134,949</td>
<td>146,652</td>
<td>+7.98</td>
</tr>
</tbody>
</table>

Table 2: 2011 census summary
The trends show that, over the last 30 years, younger age groups (0–19) have been declining and older age groups (45+) have been increasing, particularly the age group 65+. The percentage of resident population within the core 20-29 and 30-44 age groups has decreased by 8.1% over the last 20 years (1991 to 2011). This is illustrated in these two charts which provide comparisons with other areas and over the last four census returns.

The requirement to address population change is an overarching issue considered throughout this whole report. A separate background report on our review of the 2011 census is available on our website.
SUSTAINABILITY

Sustainability and climate change remain central to public policy and should be a key theme in new planning strategies. The Climate Change (Scotland) Act sets a target of reducing greenhouse gas emissions by at least 80% by 2050, with an interim target of reducing emissions by at least 42% by 2020. It is expected that planning will support these targets in various ways – through low energy design, efficient use of land, buildings and infrastructure, and protecting and enhancing the natural and cultural heritage. It is proposed that this is an overarching theme throughout the new Local Development Plan which all policies and proposals contribute to.

It is recognised that Section 72 of the Climate Change (Scotland) Act 2009 requires:

‘A planning authority, in any Local Development Plan prepared by them, must include policies requiring all developments in the Local Development Plan area to be designed so as to ensure that all new buildings avoid a specified and rising proportion of the projected greenhouse gas emissions from their use, calculated on the basis of the approved design and plans for the specific development, through the installation and operation of low and zero-carbon generating technologies.’

It is proposed to amend the Local Plan’s policies to ensure this is met.
“Since 2008 there have been significant changes in the economy that have affected the National Park area...”

The following section provides a summary of the main trends for discussion.

**THE ECONOMY**

Since 2008 there have been significant changes in the economy that have affected the National Park area, like all parts of the country – with dramatic changes in terms of levels of investment and public and private finance. The effects have included a general rise in unemployment, fewer properties being bought and sold, dramatic reduction in rates of new development, increase in vacant commercial properties, reduction in some public services/facilities and affordable housing subsidies.
TOURISM & VISITOR EXPERIENCE

Despite the economic downturn nationally, more people are holidaying at home and visitor pressure on Loch Lomond & The Trossachs National Park as a popular visitor destination has continued – with indications of an increase in expenditure.

Key indicators include:

- Over 1 million trips were made by UK residents to Scotland’s two National Parks, accounting for 8% of total overnight tourism trips in Scotland and 7% of total visitor expenditure

- Loch Lomond Shores is the second most popular free attraction in Scotland with 1,125,496 visitors in 2012

Investments help create confidence for the private sector to invest:

- **Significant investment in visitor accommodation and facilities;**
  - Strong investment on Loch Lomondside and Loch Long - The Carrick Golf Resort and Spa, Ardgartan Hotel & Forest Holidays Lodges. Planning permission for the Ben Arthur resort, close to Arrochar. This is a 5 Star resort that will also include a marina
  - Regenerated or refurbished hotels in Luss, Crianlarich and Balquhidder

- **Infrastructure and Visitor Management improvements –**
  - Established water based public transport on Loch Lomond
  - East Loch Lomondside: seasonal camping byelaw, informal camping facilities, traffic management, improved signage, ranger/police patrols and alcohol byelaw
  - 5 Lochs Management Plan – first phase of facilities in place in two locations on Loch Lubnaig

- **Scenic routes –** As part of a Scottish Government initiative, the first pilot schemes are due for completion between April and June 2014
HOUSING

The National Park remains one of the most expensive areas in which to buy a house in Scotland and external buyers continue to be a substantial presence on the housing market.

There continues to be high levels of need for affordable housing within the National Park. This is particularly the case within the Stirling Council area and parts of Argyll and Bute Council area around Loch Lomondside.

There have been very low rates of housing development over the last few years, as highlighted earlier, with little affordable housing being delivered.
INFRASTRUCTURE AND SERVICES

The importance of the provision, and safeguarding, of infrastructure and services has been highlighted repeatedly by local communities and businesses. This includes basic community facilities such as schools, car parks, public toilets and roads. The quality of broadband service is a key issue in many communities throughout the National Park.
The following topics reflect other important issues or activity in the National Park.

**RENEWABLE ENERGY**

The Park’s water resources have long been utilised for both drinking water and energy generation. Over the last 10 years there has been a significant increase in small run of river hydro schemes which demonstrate how sustainable development can be successfully delivered within a sensitive ecological environment and landscape. The schemes are being progressed by landowners, communities and businesses, to reduce their energy costs and supplement their income.

Supplementary guidance has been produced to help facilitate this development. The chart opposite illustrates the level of interest.

While there has been little interest in wind turbine proposals within the Park, there have been an increasing number of commercial wind farm proposals close to the Park’s boundary. Some of these have been in locations where their visibility from the Park and setting has been of concern.
FLOOD RISK MANAGEMENT

The National Park was designated a Responsible Authority under the Flood Risk Management (Scotland) Act 2009 in December 2013 on account of our planning function (the current Local Plan requires new proposals that may be at risk of flooding to be the subject of a Flood Risk Assessment). Primarily this requires us, in exercising our functions, to ‘act with a view to achieving the objectives set out in the flood risk management plan’ for the national and relevant flood risk management plans. The focus within this new regime is that sustainable flood risk management is central to policy and decision making.

WILD LAND

Areas of wild land have now been mapped, (information which was not available when preparing the current Local Plan) and these maps are included in the National Park Partnership Plan. Scottish Natural Heritage have prepared a national map. Together, these maps provide a clearer basis for managing appropriate development and activity in these areas.

QUESTIONS

DRIVERS FOR CHANGE Q1:

Do you agree with the summary outlined?
Is there anything we have missed?
From previous sections it is clear that there are some new and continuing issues that we need to explore.

In identifying these we need to focus on what the Local Development Plan can have greatest influence over and where there is a need to change the current Local Plan’s approach. It ideally needs to be a relatively short list, to enable a focused approach that can be monitored and is realistic to deliver or improve.

Where no change is thought likely, or is proposed, then the current policies in the Local Plan will be continued into the Proposed Plan (which is consulted upon after the Main Issues Report and includes the draft policies).

Issues not outlined, particularly those relating to landscape, natural and built environment are considered to continue to be significant considerations, but that the current framework of policies in the Local Plan remain robust and effective, with only minor updates required.

The separate Policy list and Action Summary outlines a summary of our review of current policies, highlighting those that are proposed to be amended or kept the same. Some of the content will be moved into new statutory Supplementary Guidance which will accompany the Local Development Plan.
4.3 MAIN ISSUES, POTENTIAL OPTIONS AND SOLUTIONS

RURAL ECONOMY

Profile

The economy of the National Park reflects its location as an area of accessible countryside within the hinterland of the cities and towns of central Scotland. This close proximity to large urban areas and its high quality natural environment means that tourism dominates. It also means that the larger towns and cities close to the Park are typically more attractive locations for businesses and commercial premises as they are closer to their customers or demand for their services.

However, the Park is an attractive area for people who work in these businesses to live and commute from, and also for small or sole practice professional consultancies. Rural landownership is dominated by privately managed farms and a number of large private estates along with public and third-sector land, particularly the Forestry Commission which includes large parts of the Queen Elizabeth and Argyll Forest Parks. Decisions made by land managers are key to ensuring a healthy rural economy.

Agriculture, particularly sheep production and forestry, remain the backbone of the rural economy, with the support from Government subsidies being critical. The entire Park area is currently covered by the Less Favoured Area Support Scheme which reflects the challenges to farming across the area – although this is currently being reviewed. While not the largest employer, the importance of their role in land management and maintaining the traditional character of the Park is significant.

Small scale run of the river hydro schemes are now established as being an important income for rural landowners, with a significant rise in both proposals and schemes operating. There has been a low level of diversification to generate income from tourism and leisure interests.
ISSUES AND OPPORTUNITIES

The Local Plan identified a range of sites and also a supportive policy for diversifying rural businesses. Despite this, there has been a low uptake on the development of the sites allocated for Economic Development and no uptake on the Rural Activity Area sites which provide opportunities for a variety of business/industry uses in rural locations. The numbers of planning applications for economic development uses or development has also been low over the last two years (excluding tourism).

Despite this, the 2013 National Park Business Space survey highlights that there is demand for more land and new premises for business. The key points the survey highlighted were:

- 37% of business owners who responded feel that they need to relocate their business in order to accommodate their business needs, 56% of those require space for an office and/or other professional service
- Callander and surrounding area was highlighted as the place with the highest demand for business space
- Nearly 60% of businesses require rural land/countryside in order to expand their business
- The majority of business owners require in-between 50 - 250 sq m (538 - 2691 sq ft) of new land in order to meet their aspirations
Some of the other barriers to growth raised by responders include high rents, limited choice of land, planning & SEPA restrictions, poor roads, sewage, broadband and a limited number of serviced units available.

These issues are not uncommon within rural Scotland. However it is perhaps not always clear, or understood, how supportive planning policies are already of diversification – from traditional rural activities to leisure, recreation or tourism development. While there is no evidence to suggest the current Economic Development policies require significant change, there is a need to prompt a discussion to increase activity.

The National Park provides a unique opportunity to work towards solutions with partner organisations. It is one of the few areas in Scotland where landowners can benefit from the special landscapes and environment and the business opportunities that this brings to the Park for services and accommodation.

An example of this type of approach is our existing modest programme of providing assistance to landowners to help realise the economic and environmental benefits through whole farm and estate management plans. Separate to this, landowners are also increasingly looking to this more holistic approach to realise the value of their land and assets.

It is clear there is a common ground between the aims of landowners (to ensure they have a viable business, which in turn supports employment, housing and generates expenditure) and the Vision outlined earlier. Examples of our current work with landowners include with Glen Falloch and Luss Estates, Portnellan and Inverlochlarig Farms.

Questions

RURAL ECONOMY Q1:
Should we provide greater support for a broadening of economic activity by providing greater flexibility for new business development in the countryside?

RURAL ECONOMY Q2:
Do you agree that a pilot approach should focus on two key areas in the Park as outlined on page 42?

RURAL ECONOMY Q3:
Do you agree that closer links with Land and Visitor Management would be beneficial?
“It is clear there is a common ground between the aims of landowners and our Vision.”
OPTIONS AND SOLUTIONS

PREFERRED OPTION

Provide greater flexibility

It is suggested that, as a pilot, two areas of the Park are identified – Luss and its wider area and the area between Balmaha and Drymen – where Rural Development Framework Areas are proposed to support bespoke strategies for development in these areas. The Frameworks, as part of the Local Development Plan and supported in Supplementary Planning Guidance, would set out:

- development opportunities and constraints
  - it would be location based, but not necessarily site specific

- where a specific policy response is required
  - for example, where it might be appropriate to vary from Park wide policies on housing, tourism or economic development in the countryside – either to be more restrictive or more flexible

- key initiatives that require co-ordination, in the short, medium and long term

- proposals for partnership working between landowners, the National Park, communities, local authorities and other partners. These may not be new and would reflect existing projects with a development implication. For example agreeing the delivery priorities for Luss Estate’s Strategic Development Framework

- priorities for infrastructure improvements
  - identify current deficiencies in car parking, water access or other visitor management and community issues that may have a development implication

- detail who the lead organisation or landowner is and those that need to contribute
The purpose would be to better co-ordinate development, provide more clarity for the landowners and communities on what is acceptable in planning terms and also needed. Recognising that for investment in roads, car parks, paths and affordable housing to happen there is also the need for landowners to create value in their land to help fund such development and ensure sustainability. For example, a landowner may need to build open market housing in order to generate funding for affordable housing as well as to invest in existing and/or new enterprises, such as sporting and tourism.

Working with partner organisations, such as local authorities, Scottish Enterprise, Business Gateway, in addition to landowners and developers will also be critical.

The identification of these areas reflects feedback at the 2013 Charrette events for the Drymen and Buchanan area and also the Luss Estate Framework, published by Luss Estates in October 2013. There may be other areas that this approach could be applied to, if successful.
Policy ED3 would be amended to:

a. The current policy (ED3) requires new economic development to relate to the retention of an existing rural based economic activity. This would be amended to remove this key relationship which would allow any economic activity or use provided criteria ‘b’ in the policy is met (safeguard visual, environmental impacts etc).

b. ED3 would also be amended to include support for new development in accordance with an agreed Estate Management Plan that the National Park Authority has been a partner in preparing which provides an overview of how development fits with land management and investment.

Our aim is to keep land in active management and by supporting rural diversification ensure that farming and forestry (which has developed the parks iconic landscape) is maintained.

Other Economic Development Policies would remain largely the same.

Alternative Option 1

Support more development in building groups.

This would modify (a) adjacent, to introduce the change to ED3 only within existing building groups which would be defined.

Initial research which reviewed building groups in the National Park highlighted that there were approximately 485 groups (3 buildings or more that are within 100 metres of each other) with the potential of up to 122 of these having development potential for housing, tourism or economic development. While this research is not complete, it indicates the potential development potential of building groups in the countryside to support rural businesses.

This approach would require new guidance to outline the design, siting and access standards/requirements.

Alternative Option 2

Retain current Local Plan approach

QUESTIONS OPTIONS & SOLUTIONS FOR RURAL ECONOMY:

What option do you prefer?

Why?
VISITOR EXPERIENCE

Profile

National Parks are globally recognised tourism assets and National Park status has given Loch Lomond & The Trossachs the opportunity to add to Scotland’s tourism offer. Tourism provides the major source of income and employment within the National Park and is vital for the local economy, as well as making a significant contribution to the Scottish economy as a whole.

The National Park attracts around 4 million visitors and almost 7 million visitor days a year, providing employment for 2,400 people in tourism and recreational activities, accounting for a third of all jobs in the area and supporting around 400 accommodation providers.

It is primarily a leisure destination although there is a significant business tourism market with weddings being a major component. 60% of the leisure market are day visitors, mainly from central Scotland, and 40% are overnight visitors, staying on average 4.4 nights in the Park.
In recent years there has been significant investment in some areas of the Park, particularly Loch Lomondside and Loch Long. There has also been continued interest for small scale accommodation development; a significant proportion of this is for holiday accommodation in the countryside or on gap sites within villages and towns.

Infrastructure including roads, local and long distance paths, piers/pontoons, visitor information (including signage), public toilets and car parks have benefited from some improvements led by the National Park Authority and our partners but largely remain in poor condition or offer limited provision in some areas. Improved water transport on Loch Lomond has successfully offered alternative means of travel to the private car for people to explore the Park. Whilst this is a positive start, there is still much more to be done to increase opportunities for people to travel to, and around, the Park via boat, bike or boots.

The Local Plan is generally considered to be providing a positive framework for guiding tourism development, however there are several sites identified for tourism or recreational uses that have seen little activity or developer interest. While this is most likely as a result of current economic circumstances, it may also be due to an increasingly competitive sector. It is timely to review these sites and ascertain whether they still represent good tourism opportunities or, if not, whether they can then be considered for alternative uses.

“The Local Plan is generally considered to be providing a positive framework for guiding tourism development...”
ISSUES AND OPPORTUNITIES

The National Park Tourism Strategy and the National Park Partnership Plan identify the following issues and opportunities:

ISSUES

- Lack of and poor quality visitor infrastructure
- Limited range of/ lack of high quality visitor facilities, particularly accommodation across all market sectors
- Lack of public transport around the Park
- Visitor management issues due to visitor pressure resulting in overcrowding in specific locations at peak times

OPPORTUNITIES

- Additional facilities and improved infrastructure, scenic routes, viewpoints and paths which will incentivise private sector investment and provide supporting services
- Additional accommodation development
- Increased activities for visitors
- Event development
- Grow the food and drink offer, water transport and better linked walking and cycling routes (to enable more opportunities for short breaks – walking or cycling between different locations in the Park)
This should be set within the context of the National Park’s Tourism Strategy which states that ‘with 7 million day visits annually in the National Park it is not necessarily about attracting greater numbers but about providing experiences with a range of offers that appeal to targeted market segments and encourage greater spend and more overnight stays.’

A high quality visitor experience should be delivered across all markets in terms of the quality and range of provision, for accommodation this does not just mean high star rated hotels but also more affordable good quality self-catering options as well as camping and motorhome provision at a range of locations to offer a diverse range of experiences.

To achieve this, the key policy change proposed is that the National Park is now viewed as a whole in terms of tourism strategy, rather than a series of sub-destinations. It is one destination but has different markets, each looking for different things. We must continue to cater for existing markets but also consider additional facilities and experiences that will meet the needs of other markets. The challenge is to do this whilst ensuring that the environment and landscape – the very things that underpin the visitor experience and why people visit the area – are conserved and enhanced.
Where should new development be supported to take advantage of these opportunities?

- **Arrochar and Tarbet** – Marine gateway to the National Park, improve sense of arrival at Tarbet & Arrochar, with a focus on Arrochar 3 Villages Hall site (heritage centre, new village square) and Tarbet for improved facilities and access to Loch Lomond, better path/safe route between Arrochar & Tarbet

- **Luss** – enhance the visitor experience and address visitor management issues

- **Kilmun, Strone and Blairmore** – natural and built heritage based tourism with promotion of water access

- **Tyndrum** – promote heritage, improve public realm, creation of central hub

- **Callander** – A hub for family outdoor adventure and adventure capital of the National Park

- **Aberfoyle** – although not mentioned in the National Park Partnership Plan as a location for strategic tourism development opportunities. Public realm – Riverside and Main Street. Untapped potential for forest lodge style self catering for families and groups. Short break destination for those who love the outdoors. Flooding is a key issue

- **Drymen** – eastern gateway to Loch Lomond. Traffic and parking pressures. Develop better linkages with Balmaha, alternative means of travel between the two. Management of visitor pressure at Balmaha

- **Balloch** – busiest gateway into the National Park, water access, Lomond Shores & Balloch Country Park
It is proposed that the majority of new development should continue to be directed to the towns and villages. However there is continued interest for tourism development in the countryside, particularly holiday accommodation, and the right balance is required for supporting small scale tourism development as a way of sustaining the rural economy and existing businesses, whilst ensuring that the landscape and environment are safeguarded from an unplanned and uncoordinated increase in development.

While the Local Development Plan needs to provide clear spatial direction for this, there is also a desire for it to provide flexibility to allow currently unplanned and unforeseen developments to take place. This relates especially to visitor management where the National Park Authority might seek to trial new approaches or put in additional infrastructure to tackle visitor pressures and anti-social behaviour. Linked to this, there is opportunity to trial alternative approaches to support new camping provision, particularly low impact and informal camping experiences within appropriate countryside areas of the Park. Camping is unlikely to be viable on its own and is most likely to be sustainable over the longer term where it is linked to a rural business. This will enable people to experience the Park in new ways, thereby enhancing the overall visitor offering. Similarly, there is scope to consider the needs of the motorhome sector and recent investment for this at Loch Lubnaig provides a good basis for monitoring this new approach.

**QUESTIONS**

**VISITOR EXPERIENCE Q1:**
Callander, Balloch, Tyndrum, Drymen, Arrochar and Tarbet are identified in the National Park Partnership Plan as the key locations where strategic tourism development will be supported within the National Park. We think that the Aberfoyle area also offers potential for some further tourism development and also that Blairmore, Strone and Kilmun could better utilise their natural and built heritage and sea access for tourism and community purposes.

Do you agree? Are there any other settlements where we should support tourism investment and development?

**VISITOR EXPERIENCE Q2:**
We think that small scale development should be supported in appropriate countryside areas but that we need to better define where these areas are in order to provide certainty and guidance for investors, developers and local communities.

Do you agree?

**VISITOR EXPERIENCE Q3:**
Where should new provision for camping and motor-homes be supported?
The approved National Park Partnership Plan provides spatial guidance for directing new tourism development, and the preferred approach accords with this:

(a) Continue to direct larger scale tourism development to within or adjacent to settlements, the sites identified above and in the settlement maps, in addition identify opportunities in Aberfoyle and Blairmore, and

(b) Support small scale development within the areas shown on map (See map - section 2.2). These are areas with access to a good range of visitor infrastructure and facilities, including cycling and walking routes and/or links with settlements providing services and transport.

Outside these areas, development will generally only be supported where:

- Part of it does, or will contribute to, a visitor management plan for a specific area
- They improve or extend existing facilities
- They are part of a sustainable local transport solution or
- They are part of a farm diversification/wider land management plan that will help deliver wider land management benefits. This will be linked to the approach for Land and Rural Economy

This would be accompanied by more detailed supplementary guidance, which would provide more detailed spatial planning guidance and guidance for different development types – for example visitor accommodation, visitor facilities & infrastructure and recreation.

**Alternative Option**

An alternative approach would be as part (a) in the above Preferred Option but to consider additional areas to part (b) within which small scale development could be accommodated. This would require a clear case to be made that demonstrates the merits of a particular area of the Park for accommodating small scale tourism development in terms of available infrastructure, facilities, services and transport options.

**QUESTIONS OPTIONS & SOLUTIONS FOR VISITOR EXPERIENCE**

**QUESTION 4:** What option do you prefer? Why?
INFRASTRUCTURE AND SERVICES

Profile

Within the National Park, like much of rural Scotland, basic infrastructure and services are much more important than in more urban areas, as there are fewer alternatives or choices. For example, a community may only be served by one road, whereas an urban community may have several access roads. If that one road is closed, flooded or in poor condition it has a significant impact on the community. Similarly, there is likely to be more than one shop or school within a bigger town or city, although only one in a small rural community.

Infrastructure and Services means:

- roads
- sewers/wastewater treatment
- drinking water
- electricity
- mobile phone reception
- broadband
As outlined, the quality and capacity can have a significant impact on quality of life and the economy. The condition of some of the roads, lack of public sewers and poor broadband were issues raised throughout the last year in our discussions with communities. While not solely issues that the planning system can solve, it is important to ensure new development does not make the situation worse and can certainly help bring improvements – through new development or formally highlighting priorities for local, central government and landowner investment programmes.

Visitor surveys highlight the importance of good quality facilities/services, such as toilets, car parks, information, broadband and signage along with accessible, well located car parks and accommodation. Tourism businesses rely on well maintained pavements, paths, roads and piers so that visitors can visit the area year round and easily move around. The balance of tourism development in towns and villages is a concern in some communities.

With changes in health care provision, care and access to care has now changed. This means that the elderly can receive more care at home – while greater centralised specialist provision and day surgery highlights the need for good public transport. There is now less need for large elderly care homes, but a greater need for more small homes. This is something the Local Development Plan can directly support.

There is one secondary school within the National Park: McLaren High, in Callander, with the area serviced by 5 others in larger towns close to the Park (Helensburgh, Vale of Leven, Dumbarton, Dunoon and Balfron). There are many more primary schools, which are central to their communities, one having closed in recent years, a small number seeing a reduction in roll and others having little additional capacity. The number and location of new homes, as well as where new businesses locate can directly influence the demand for schools.
**ISSUES AND OPPORTUNITIES**

The following provides a summary.

**ISSUES**

- Changing needs and demands for public services – for example, elderly care at home and health care
- Limitations in infrastructure such as poor roads (local and trunk roads), pavements, civic or community space, car parks and information in some locations. Typically, despite the high quality of the natural environment, the quality of these types of infrastructure is poor
- Many of the central areas of the towns or villages could be improved in terms of the location of visitor information, car parks, community space and traffic management
- Some schools have restricted capacity – Callander and Drymen Primary for example. In other locations, school rolls are low – raising concerns within communities of the risk of future closure
- Poor broadband provision across the area
- Flood prevention/protection needed in key locations
- Disposal of local authority buildings and land
- Limited public sewer provision in places – for example Kilmun, Strone and Blairmore

**OPPORTUNITIES**

- Increasing interest, and government support for, community ownership, maintenance or operation of a range of public services
- Support, as part of work with local and central government partners, improvements in broadband provision
- Increased support for community land or building ownership
- Growth in small scale hydro
- Increase in water based transport on Loch Lomond, with further opportunities in the sea lochs and Loch Katrine
- Commercial development, contributing to improved infrastructure, can unlock investment
- New housing development can increase the demand and viability of services and infrastructure
- East Loch Lomond and 5 Lochs visitor management improvements
- The programme of regional and local paths being improved
OPTIONS AND SOLUTIONS

PREFERRED OPTION

1. Continue to focus new development in or adjacent to existing settlements – that will help secure existing public services

2. Prepare area wide policy guidance to secure a better balance of tourism development in particularly pressurised locations – as outlined in the preferred Rural Economy option

3. Identify priorities for infrastructure or service improvements that new development may be required to contribute to each settlement in the Local Development Plan

4. Secure greater planning contributions for infrastructure, service provision, maintenance or improvements

5. Support greater focus on improving village and town centres – pavements, signage, street furniture, car parks, higher quality design and use of materials. Where this is particularly needed, will be highlighted in ‘Placemaking Priorities’

QUESTIONS

INFRASTRUCTURE & SERVICES Q1:
Do you agree with the opportunities listed? Are there others?

INFRASTRUCTURE & SERVICES Q2:
How best to deliver improvements to infrastructure that benefits communities and visitors through new development?

INFRASTRUCTURE & SERVICES QUESTION 3:
How can the retention and improvement of key community services such as schools, healthcare, road and broadband be supported?

INFRASTRUCTURE & SERVICES Q4:
Do you agree with the options listed? Any further suggestions?
Housing remains a key issue for the National Park. The quality of the environment combined with ease of access in the south and east to central Scotland makes it a popular commuter area for people on good income levels. It is also popular for people retiring or seeking a lifestyle change and consequently is one of the most expensive areas to buy a house in Scotland. Analysis of house sales over the recent ten year period reveals that 7 out of 10 house buyers came from outside the National Park.

There continues to be a high level of housing need — from many people living and working in the Park who experience difficulty addressing their housing needs on the open housing market. Delivery of affordable housing (either for rent or low cost housing for sale) within the rural area is proving to be challenging, particularly over recent years when there have been lower levels of public subsidy available.

Like many rural areas, it is common place for young people to move away to gain further education or work experience, with some later wishing to return to raise their family.

“The quality of the environment combined with ease of access in the south and east to central Scotland makes it a popular commuter area...”

2 The Population and Housing background report provides information on housing need and demand across the National Park.
In terms of the types of housing, while there are plenty of larger homes that are owner occupied, there are far fewer cheaper (relative to income levels) and smaller sized homes to buy or rent.

Very little new housing has been built within the National Park over recent years. While there remains strong aspirational demand for housing, the impact of the economic recession has affected the ability of people to secure finance, which appears to have reduced demand. Not that many of the housing sites (which require a proportion of affordable housing) have been built and most of the housing applications approved (around 80%) have been individual open market houses.

**ISSUES AND OPPORTUNITIES**

New housing can help attract and retain population, and assist in counteracting projected long term population decline. With an ageing population projected for Scotland as a whole, but more acutely for the National Park, housing provision across all tenure types is also critical in helping achieve a more balanced age profile.

The housing market within the Park mostly satisfies external demand. While in-migration is necessary and should continue to be encouraged, the housing market at present is not adequately meeting the needs of people living and working in the area. It is therefore important that new housing should help to better address the needs of everyone in our communities, including families, young people starting out on the property ladder and older people wishing to downsize. We think that there needs to be greater diversity in the size and types of new housing built, including an increase in affordable housing options, and that new housing developments should provide more smaller sized homes in comparison to larger ones.

We must also ensure that our housing supply meets the needs of increasing numbers of smaller and/or older households in order to help ‘shift the balance of care’ – the Scottish Government’s national policy of supporting people to remain living at home for as long as possible. The provision of attractive homes for older people has wider benefits because it could in turn help to free up much needed under-occupied housing for families.

The main issues for consideration are the number of new homes required up to 2026 and whether the housing policies are helping to deliver the right homes to meet the needs of the Parks communities and support the local economy.
The current Local Plan sets a target of 75 new homes a year. Over the last 6 years (2008-2013) an average of 48 houses have received planning permission and 23 houses have been built each year.

Given this, is the current target of 75 new houses per year still appropriate? The issues that need to be addressed would suggest it is, as considered earlier in terms of need, demand and population change.

Continuing this target is clearly ambitious, however past trends reflect development during a period of market depression. This has been a period where house building rates have been at their lowest for a generation.

The new Local Development Plan requires planning for the longer term and creating a positive planning framework to facilitate and enable new development to come forward in the future. Identifying a generous supply of land creates a range of opportunities and ensures that housing market recovery is not held back by a lack of land. Perhaps most importantly, when considering the target number, it should be related to where and how much development this would mean in our communities. Each town or village should have identified land to grow – both for employment generating development and new homes for the young and the old. This helps create better places – and therefore there should not be a sole focus on the target number.

**QUESTIONS**

**HOUSING Q1:**

How much new housing is required?
What option do you support? Why?
OPTIONS AND SOLUTIONS

PREFERRED OPTION

Continue planning for 75 new houses a year

Whilst recent development trends have been lower than targeted, we still consider that the Local Development Plan should continue to plan for growth in the region of 75 new dwellings per annum giving an overall housing target of 750 housing units. This will ensure a generous supply of land (as required by Scottish Government) and will provide a range of housing opportunities and flexibility for delivery of these. There is presently enough land identified for around 380 houses within allocated housing sites within the current Local Plan, so this will require the Local Development Plan to identify additional allocated land for 160 dwellings up to 2026, with the remainder being addressed through windfall sites. This additional land can be identified, with a focus on the Arrochar and Callander areas where there are also proposals for employment land. New housing can be delivered on identified sites and also on small gap sites or on land that is currently used for another purpose).

Alternative Option 1
Modest reduction in housing supply targets

An alternative option, would be to lower the new housing supply target to around 50-60 dwellings per annum. This recognises, but is still in excess of, recent development trends and would still allow for growth. This will not require the Local Development Plan to identify land for additional dwellings up to 2026, as this can be met through current land allocations and windfall development.

Alternative Option 2
Significant reduction in housing supply targets

An alternative option would be to consider a lower target that reflects recent development trends. This option is not favoured given the key role that new housing supply has in helping to address predicted population change and decline, and the requirement to address housing needs arising within the National Park.
Due to the challenges of delivering housing within the National Park, we think that more flexibility needs to be introduced to the housing policies to ensure that private sector investment is better utilised to help cross-subsidise affordable housing provision.

Affordable housing targets are not being achieved (for a range of reasons, but primarily due to high development costs and lower funding availability) and we think that a review is needed to help bring forward development. This would also be in line with recent Scottish Government guidance contained within the draft Scottish Planning Policy which states that affordable housing requirements should generally be no more than 25%.

There is presently no planning policy guidance or control over small sites, of up to three units, except for the Loch Lomondside communities. The Local Development Plan could include guidance for all small sites as they contribute significantly to the housing land supply – the majority of new homes built in recent years - and could be better utilised to help address communities’ housing needs.

We know that the Loch Lomondside area continues to experience strong housing demand and consider that housing policy still needs to differentiate between this and other areas of the Park.

3 Currently the proportion of all housing required to be affordable on sites of four or more units varies from 25% to 50% in most settlements and increases to up to 100% for the Loch Lomondside communities of Tarbet, Luss, Gartocharn, Drymen and Croftamie

QUESTIONS
HOUSING Q2:
How can we best deliver housing in the National Park?
The main policy issues that require consideration are:

- Whether the affordable housing requirements should be reduced on housing sites of 4 or more units?
- Whether planning policy should be introduced for sites of up to 3 units, and if so what this guidance should require. For example, should small sites help provide more affordable or smaller sized houses? If not, should we require that a financial contribution is given instead to help fund affordable housing elsewhere? This would provide funding to contribute to the delivery of affordable housing, by existing registered social landlords in the National Park. What is the future role of the Loch Lomondside Local Needs Housing Policy which currently applies to small sites in the Loch Lomond settlements?
- How can appropriate new housing in the countryside be supported?

More detailed background information is outlined in the accompanying Population and Housing background paper.
We have set out how these policy issues could be addressed in the following options.

IN THE SETTLEMENTS:

PREFERRED OPTION

Lower Affordable Housing Requirement AND amend current policy approach to require financial contribution on sites up to 3 units in ALL AREAS, removing current Local Housing Needs Policy for Loch Lomondside

a. **On housing sites of 4 or more units**, reduce the affordable housing requirement to a minimum of 25% for all settlements except for Loch Lomondside (Tarbet, Luss, Gartocharn, Drymen and Croftamie) where a 50% requirement would apply (with flexibility to amend this where abnormal development costs are demonstrated), and

b. **On housing sites of up to 3 units**, require either an affordable or smaller sized house is built, or that a financial contribution is made to help fund affordable housing provision elsewhere within the local area. This new approach would apply to all communities within the National Park including Loch Lomondside communities and would replace the current Local Housing Needs policy for the Loch Lomondside area. There would be a variance in the level of financial contribution required between the Loch Lomondside area and all other communities within the Park, a higher contribution would be required in the Loch Lomondside area to reflect the more pressured demand on this area.
Alternative Option 1
Lower Affordable Housing Requirement
AND amend current policy approach to
require financial contribution on sites up to
3 units outside Loch Lomondside, retaining
current Local Housing Needs Policy for Loch
Lomondside

a. **On housing sites of 4 or more units**, reduce
the affordable housing requirement to
a minimum of 25% for all settlements
except for Loch Lomondside (Tarbet, Luss,
Gartocharn, Drymen and Croftamie) where
a 50% requirement would apply (with
flexibility to amend this where abnormal
development costs are demonstrated), and

b. **On housing sites of up to 3 units**, require
either an affordable or smaller sized house is
built, or that a financial contribution is made
to help fund affordable housing provision
elsewhere within the local area. This new
approach would apply to all communities
within the National Park except the Loch
Lomondside communities where such sites
would be reserved for either affordable or
local needs housing only.

The Preferred Option and Alternative Option 1 introduce the provision of a financial
contribution (otherwise referred to as a
commuted sum) for single units or small sites
of under 3 units in lieu of on-site affordable/
or smaller size housing provision. If supported,
Supplementary Planning Guidance would
require to be developed in partnership with
a range of stakeholders to determine the
appropriate value of contribution required. At
this stage we would suggest that a sliding scale
of values is used depending on house size and
location which would differentiate between the
more highly pressured Loch Lomondside area
(where a higher contribution would be required)
and all other areas of the Park.