Responses to Main Issues Report consultation (Version 3)
March 2015
The LIVE Park consultation process

The LIVE Park public consultation was held for 11 weeks from 28 April until 14 July 2014. We wanted to encourage as many people as possible to get involved in the process and we welcomed comments and feedback in a variety of ways:

- Through our website either as quick comments or formal consultation responses (Responses to MIR consultation Part 1)
- Through hard copy forms either or electronically or via our online system (Responses to MIR consultation Part 1)
- At our events focused on working with Young People (‘Youth engagement and input to the Main Issues Report consultation’ - Part 2)
- Through comments on our Facebook, Blog and Twitter pages (Part 3)
- At community or stakeholder events/meetings (Part 3)

What is this Report?

This report (Part 1) includes all the comments submitted during the LIVE Park consultation process as formal responses (attributable) or ‘quick’ comments (non attributable) via the ourlivepark.com. It also includes those received via our website (including our online system – OLDP), by email or posted to us as a hard copy. As verbatim comments, these are shown word-for-word. To make it easier to analyse we’ve been through every comment and categorised them so what you’ll see presented in this report is organised by the relevant section of the Main Issues Report (e.g. by theme, such as housing or rural economy, or by area). We received approximately 653 comments to our consultation so this document is lengthy and it’s advisable to be read online along with the actual Main Issues Report document which can be found on www.ourlivepark.com by clicking on ‘Downloads’ then on ‘Full Main Issues Report’.

Sharing feedback

We want to share the feedback we received through the process either through the formal consultation, via our activity with young people or through our online and social media activity, so this report (Part 1) is the first of a series that we’ll publish.

How did we prepare this report?

Comments have been reviewed, entered into our database and split up to allocate the content with the relevant part of the Main Issues Report document. This means we have split up the comments where needed. We have not edited or summarised the comments. There are a small number of comments that we have not published in full – these are marked with asterisks (*) - as they used inflammatory or inappropriate language.
Things to remember

With 130 individuals or organisations submitting comments, generating over 650 comments, this has been a detailed and complex task. We are still reviewing the comments, summarising the changes or preferred options sought, so we may need to change how we have allocated them and so we may produce further version for our internal use. We still hold the original responses separately and will also use the full response received when analysing the comments. Where a document has been submitted with comments, we have made reference to an appendix where you can view this.

If you notice any errors that we might have overlooked, please let us know by emailing us at hello@ourlivepark.com

Please note, the consultation is now closed so there is no opportunity make any additional comments or change your comment at this stage.

If anything is unclear or you need further guidance, then get in touch by emailing us at hello@ourlivepark.com or by calling us on 01389 722600 and asking for Thom, Susan, Hugh or Stuart.
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On specific comments I have a few. Firstly, tourist signage within the park must be improved for general amenities. Several times a year I am stopped on the street in Balloch and asked where the nearest Petrol station is. From the round about at Park HQ it is only a few hundred meters but is not signed. I think through the park, general tourist brown signs need improvement for petrol in particular but other services as well.

Scenic routes should also be signed better, two weeks ago my wife and I explored the East of the park to see the new public art installations. It took us all day to find and staff in the Callander park office had no clue where it was.
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Verbatim Comment:
Thank you for the great promotion, and clarity of information in the current Park consultation. I am a resident in Balloch for the past 2 years with my wife renting within the park boundary and hope to purchase a house soon within the park between Balloch and Drymen.

Understanding that house stock is very limited, and that the park predicts a decrease in young working age individuals which I fall into, the consultation is of great importance.
I live in Buchanan Castle Estate and we don't require or wish any economic or housing development at all, we just want to be left alone. As public servants it is your job to represent the wishes of the public i.e. us, so please don't try and ruin where we live because a consultant told you it was a good idea, it's not. It might be appropriate for other areas but not for here.

Your job and main aim is to conserve, not to develop, the housing market in G63 has been stagnant for some years now so there is no demand for further housing, affordable or not.
Main Issues Report Our Live Park Comments Received

1 Introduction and Overview >> 1.2 Overview

Customer Reference: 00047
Customer Name: Kilmun Community Council
Comment Reference: LDP01/MIR/CONS/00047/2/001
Comment Method: EMAIL
Customer Type: Local Public Body

Verbatim Comment:
We entirely agree with you that ‘Infrastructure & Services’ are a key for our community and visitors. However, this doesn’t seem to be shared by Argyll & Bute Council who is closing local toilets and expecting tourists & visitors to use toilets in a graveyard. Support from the National Park to persuade A&BC to reconsider this decision would be advantageous.

---------------------------------------------------------

1 Introduction and Overview >> 1.2 Overview

Customer Reference: 00107
Customer Name: Non Attributable
Comment Reference: LDP01/MIR/CONS/00107/1/079
Comment Method: ONLINE
Customer Type: Information not available

Verbatim Comment:
Outbreak of Japanese Knotweed- located on the A809 at Finich Toll- pass onto FC or relevant party.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
### Customer Reference: 00174

### Customer Name: Rob Latimer

### Comment Reference: LDP01/MIR/CONS/00174/1/001

### Organisation: (If applicable)

### Comment Method: OLDP

### Customer Type: Individual Resident

### Verbatim Comment:

The National Park was designated to manage visitor pressure but this management has to reflect the needs of local people. A major consideration should be how to achieve gains for both visitors and the tourist sector as well as meeting the needs of locals who are not involved directly in tourism. Many developments are able to achieve this balance particularly those which relate to infrastructure improvements.
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 1 Introduction and Overview >> 1.2 Overview

Customer Reference: 00185
Customer Name: Scottish Government

Comment Reference: LDP01/MIR/CONS/00185/1/001
Comment Method: EMAIL

Verbatim Comment:
The Scottish Government welcomes the publication of Loch Lomond and the Trossachs National Park Main Issues Report (MIR), demonstrating the Authorities commitment to put in place a new style Local Development Plan (LDP) for the National Park. I am responding on behalf of the Scottish Government, including Transport Scotland and Historic Scotland.

We have structured our response under general comments, engagement, main issues, policy areas, spatial strategy, Supplementary Guidance and Action Programme. We finish with some concluding comments with a view to progressing towards the production of the Proposed Plan. In Annex 1 we have supplied comments from Transport Scotland and Historic Scotland.

General Comments

Scottish Government’s policy on nationally important land use matters is contained in Scottish Planning Policy 2014 (SPP 2014) and the national strategy for Scotland’s development is contained within National Planning Framework 3 (NPF 3), both of which were recently published. Our role at this stage is to ensure that the Main Issues Report and the Proposed Plan (PP), which will follow, fit with Scottish Government policy and reflect Minister’s priorities, which are contained within these documents. We also want to ensure front loading of the process and emphasise the importance of resolving issues at the earliest opportunity.

The MIR has good links with the National Park Partnership Plan, its Spatial Development Strategy and strategies such as the National Park’s Tourism Strategy. Overall the MIR is easy to use and understand. We found the MIR clearly sets out the key changes that have occurred within the National Park as well as the reasoning and justification for the proposed way forward. We found the MIR to be an exemplar in its use of images and graphics to engage the reader and to convey the messages of the document. We welcome that the MIR identifies overarching themes for the LDP which include Placemaking and Sustainability, which is consistent with SPP 2014. We note that the existing landscape, natural and built environment policies are considered to remain robust and effective and as such, that only minor updates are required. We would highlight the importance of all policies (including those being carried forward) being aligned with the position set out in SPP 2014 and NPF 3.

Please see appendix 11 for more information

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com

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Renewable energy - Planning application fees for micro (one home) projects should be reduced. The benefits of many schemes are marginal and the application cost is significant.
It is good to see a document at this early stage sharing a view of the current issues and hopefully by taking on board comments the new plan will be relevant to the local population. Section 1.2 has a focus on small towns and some smaller sites such as Aberfoyle. I am however concerned that the needs and issues associated with even smaller more dispersed communities are not touched upon in the report. These communities struggle with a lack of basic infra-structure. In Kinlochard for example, the school and village shop have both disappeared over the past 15 years. At the present time in Strathard and Drymen the viability of the GP services is under threat and in addition the local transport system DRT is also under review. In addition the poor quality of our road the B829 offers a very negative experience to all users. So please consider all of the communities and their needs rather than just the slightly bigger ones.
On the whole the production of the LIVE Main Issues report is welcomed by B&HCC as an attempt to look to the future at the various aspects that make up the Park and highlight what the public have earlier made comment on.

While it is an obligatory consultation for local people, the online labyrinth response form is bewildering for many and out of reach for many more. The children, future conservers of this area have no voice, the wildlife even less consideration. I would request that such consultations be simpler - the instructions for referencing etc. are just too complicated and outwith the skills for computer response for most respondents I should think.
Furthermore, I think it is extremely disappointing that there has been no formal consultation with the Port of Menteith community - this is where these lodges are being built, not in Aberfoyle (i.e. PoM gets all the grief but the benefit is to those living in Aberfoyle). We only found out about this proposal yesterday and only because a neighbour heard about it at least week's PoM community council meeting - virtually none of us in the community were aware of this proposal at all. One has to ask if this is a deliberate effort to avoid the confrontation that is bound to occur over this?
### Chapter Commented on: 1 Introduction and Overview >> 1.3 How can I share what I think? >> 1.3.1

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**Verbatim Comment:**

Proposal for MIR4 - I see as an abuse of the planning process and should be withdrawn until proper consultation with the correctly affected community has taken place. Placing this within the scope of Aberfoyle is an abandonment of due process. If due process had taken place this would have exposed this proposal to the Port of Menteith community, who would no doubt have pointed out the rather obvious conflicts that the proposal presents. I have only just become aware of this, and if this is not withdrawn, I will have recourse to no other opinion that this lapse of due process is not by accident or incompetence, but by design.

### Chapter Commented on: 1 Introduction and Overview >> 1.3 How can I share what I think? >> 1.3.1

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**Verbatim Comment:**

Community engagement is high on the development management agenda and should be equally high in relation to development planning. The renewed efforts in relation to the use of social media in particular are welcomed. There are still however shortcomings when it comes to advertising opportunities for engagement, such as recent planningaid training events which certainly in Callander were very poorly attended.
### 1 Introduction and Overview >> 1.3 How can I share what I think? >> 1.3.1

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**Verbatim Comment:**

Engagement

Details of the consultation undertaken to inform the production of the MIR demonstrates a good range of engagement techniques, including charrette events, workshops and community questionnaires. We understand the ‘Your Park Your Plan’ initiative has fed into the production of the MIR and consider that Section 1.3 of the MIR, which highlights the different ways in which the reader can communicate their comments, is a helpful addition to the document. In particular, we welcome that the work from the charrettes clearly comes through the MIR.

As a key stakeholder we, the Scottish Government, including Historic Scotland and Transport Scotland welcome the opportunity for continued engagement in Loch Lomond and the Trossachs Local Development Plan (LDP) process. We would welcome the opportunity to comment on a working draft of the Proposed Plan and/or individual policies if the National Park Authority (NPA) would find that of assistance.
1 Introduction and Overview >> 1.3 How can I share what I think? >> 1.3.1

Customer Reference: 00214
Customer Name: Transport Scotland
Comment Reference: LDP01/MIR/CONS/00214/1/011
Comment Method: EMAIL
Customer Type: Public Body

Verbatim Comment:
Transport Scotland broadly welcome the approach adopted within the Main Issues report and welcome the early consultation and communication undertaken by the Park associated with some of the key strategic transport considerations. The comments provided below are aimed at focusing the early engagement which we would encourage in progressing the draft Proposed Plan.

Customer Reference: 00082
Customer Name: Derek Flaherty
Comment Reference: LDP01/MIR/CONS/00082/4/002
Comment Method: EMAIL
Customer Type: Individual Resident

Verbatim Comment:
This proposal is currently out for consultation, with a closing date for comments to the Loch Lomond and Trossachs National Park Authority of 7th July at 5pm. Interestingly, the majority of residents within Port of Menteith, itself, seem unaware that this development is even being considered, and those of us who do know seem to have found out purely by chance; could it be that the Park Authorities are aware of the strength of feeling this is likely to generate within the community and are attempting to avoid the ensuing confrontation?
Regarding the above (MIR 4 on the Aberfoyle proposals), I have to say there has been zero consultation with the local community in Port of Menteith regarding building these lodges; in fact, very few of the locals know anything about it at all. At the very least - given the potential huge impact this will have on the community - I would suggest that a meeting is urgently tabled for one of your team to discuss this with the locals in the Port of Menteith village hall. Considering the relatively short time now available for us to express our views, this would have to be scheduled very soon.

It is of great concern to the community that this proposal has never been made ‘common knowledge’. To me, this smacks of hiding the proposal so that no objections can be made prior to the end of the consultation. In fact, we only heard of this proposal 2 days ago and the end of the consultation period is extremely close. Expect strong objection to this now that the residents of Port of Menteith do actually know.
Chapter Commented on: 1 Introduction and Overview >> 1.3 How can I share what I think? >> 1.3.1

Customer Reference: 00130
Customer Name: John Ingleby
Comment Reference: LDP01/MIR/CONS/00130/1/002
Comment Method: EMAIL

Verbatim Comment:
It is regrettable that the Port of Menteith was not recognized as a separate community and with the scheme disguised as a scheme for Aberfoyle and Braeval the result was minimal consultation in the Port.

Chapter Commented on: 1 Introduction and Overview >> 1.3 How can I share what I think? >> 1.3.1

Customer Reference: 00158
Customer Name: Nigel Cole
Comment Reference: LDP01/MIR/CONS/00158/1/003
Comment Method: OLDL

Verbatim Comment:
I believe that proper consultation has not been held with the community or community council of the area that this proposal is impacting. Discussions have also not been held with local stakeholders in Port Of Menteith. A hastily arranged meeting booked, organised and chaired by local residents at the last minute, including financing the hall that the meeting was held in, does not constitute full consultation. The consultation process was not completed properly. Port Of Menteith is not mentioned in the documentation relating to this proposal. In fact in the whole ‘main issues’ document Port of Menteith is only mentioned once regarding affordable housing needs in ‘small rural communities’.
I find your whole consultation process on the proposed development to be totally unsatisfactory. You have proposed a major development in port of Menteith but you never visited the community to consult with them until 2nd June, five days before the consultation was due to end. Nowhere in the main issues report does it mention port of Menteith and the Braeval development is listed under aberfoyle so that many people will not have realised that you were proposing such a development in their community. If you check the live park website, port of Menteith is not listed at all which implies that there is no development proposed. The summary for site mir4 at Braeval states, 'the wider site is located close to the lake of Menteith SSSI'. This is incorrect as the site actually covers part of the lake of Menteith SSSI.
1 Introduction and Overview >> 1.3 How can I share what I think? >> 1.3.1

You've made it pretty difficult to leave feedback. I hope not to discourage people to do so (which it ultimately will), but if that is your aim, it raises alarm bells of what you are really trying to push through under the fancy info-graphics and nice pictures of highland cows. (It even suggests that you too believe - on some level - that your development plans are geared towards profit and away from the park!). If there was no intention to make it difficult to leave feedback, that was just the design, I'm sorry - it's a bit rubbish!

1 Introduction and Overview >> 1.4 Why Plan?

We do not see your fourth aim being addressed in our area within this report.
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<td>Verbatim Comment:</td>
<td>We would make the observation that the current local plan, as a result of the planning policies it contains, is restricting development. Thus we agree broadly that it needs revisited, and that policies need to be amended in order to stimulate investment.</td>
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<td>Planning process: Development plans should be scrutinised for environmental and economic sustainability under a range of economic conditions. Question: Given the objectives of the Park are all projects evaluated under a range of Environmental and Economic (best and worst) scenarios to test the viability and sustainability? Is risk analysis applied?</td>
</tr>
</tbody>
</table>
Section 1.4 Why Plan? sets out the four aims for Scotland’s national parks included in the founding legislation. However, no mention is made of section 9 - General purposes and functions, subsection (6) which sets out what has become known as the Sandford Principle whereby, in the event of a conflict between the first aim of the national park and the other park aims, greater weight must be given to the Conservation Aim in section 1(a). This information should be included because without the conservation aim the fundamental need for a national park would be lost and the public at large, businesses, landowners et al, need to be aware of and understand this key principle.

In our view, we have already had one important example of the Sandford principle being set on one side for a decade at least to allow a high risk development to receive consent, namely the Tyndrum gold mine.

We hope that with greater experience the Park Authority will not permit such high risk schemes to prejudice the key aim of Scotland’s national parks.
The maps clearly indicate areas for development, but we would like to see the inclusions of irreplaceable Ancient and semi-natural Woodland on the places, along with forest network habitats, designated sites, national cycle routes and Core Paths. We recognise that there are a large number of Ancient Woodland assets within the Loch Lomond and the Trossachs National Park including that which has been planted with non-native species and requires restoration.

Development which will cause the loss to ancient woodland, an irreplaceable habitat, should not be present in the future Local Development Plan.

Developments likely to cause disturbance should be located away from ancient woodland, particularly those likely to modify local hydrological function. Where development is located near ancient woodland, buffer zones should be retained to reduce the distance that disturbance penetrates.

Please see Appendix 6 for further information
We agree your comments, however, visitor experience is not likely to be helped with accessible public toilets being closed and replaced by toilets that are in a location that isn’t, in our view, tourist friendly or appropriate. In addition, they are not easily assessable for wheelchair/disabled users. This, we consider, is not in line with current disability legislation.

I agree with the vision as laid out and the priorities. I also agree with the planning vision in the areas I reside in currently (Balloch) and hope to stay in (Balloch or Drymen).
<table>
<thead>
<tr>
<th>Chapter Commented on:</th>
<th>2 National Park Partnership Plan &gt;&gt; 2.1 Vision for the Park</th>
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<tbody>
<tr>
<td>Customer Reference:</td>
<td>00074</td>
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<tr>
<td>Customer Name:</td>
<td>Mountaineering Council of Scotland</td>
</tr>
<tr>
<td>Comment Reference:</td>
<td>LDP01/MIR/CONS/00074/1/002</td>
</tr>
<tr>
<td>Comment Method:</td>
<td>EMAIL</td>
</tr>
<tr>
<td>Customer Type:</td>
<td>Other Public Body</td>
</tr>
<tr>
<td>Verbatim Comment:</td>
<td>The Mountaineering Council of Scotland (MCOFS) is very supportive of the vision for the Park. We do, though, question the need for an intrusive ‘authentic’ rather than simply aim for a ‘high quality experience for visitors’.</td>
</tr>
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<tr>
<th>Chapter Commented on:</th>
<th>2 National Park Partnership Plan &gt;&gt; 2.1 Vision for the Park</th>
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<td>Customer Reference:</td>
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</tr>
<tr>
<td>Customer Name:</td>
<td>Gavin MacLellan</td>
</tr>
<tr>
<td>Comment Reference:</td>
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<td>Comment Method:</td>
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<tr>
<td>Customer Type:</td>
<td>Individual Resident</td>
</tr>
<tr>
<td>Verbatim Comment:</td>
<td>The document should refer to the aims of the National Park - the primary aim being to protect the environment. This should remain the prime criteria of any measure or benchmark. Measures are biodiversity, CO2, water quality etc.</td>
</tr>
</tbody>
</table>
We commend the Loch Lomond and the Trossachs National Park on a concise and well-presented MIR. We recognise the complexity of the natural environment, biodiversity and landscape assets that have to be considered in creating a vision for the future of the Loch Lomond and the Trossachs National Park. We are pleased to note that the general focus of the plan is not just on economic and social development, but also reflects the duty placed on the public sector bodies to further the conservation of biodiversity as laid out in the Nature Conservation Act 2004.
Section 2.1 Vision for the Park - I would like to see more explicit reference to the needs, aspirations and quality of life of residents. The visitor experience is really important but surely the best ambassadors for this area are its residents!

I assumed that there would be reference and assessment of the 5 Lochs Policy and its detrimental effect on areas not covered by the policy. Loch Ard and Loch Chon are in my view in a poorer state as a result of this with a greater impact on the shoreline and islands of visitors who can misbehave in a way that they can't on Loch Lomond!

We support the vision in section 2.1 and confirm that the issues identified in the report are appropriate and we note why the policies regarding sustainability, climate change and natural environment have not been considered in this report. We welcome the current policies in the local plan will be continued into the proposed plan. We look forward to commenting on these at this stage and any Supplementary Guidance (SG) that may be produced.
A new version of Scottish Planning Policy (SPP) was issued on 23 June 2014. It sets out that the planning system should "seek benefits for biodiversity from new development where possible". We would welcome if there are additional policies or SG that could assist with this, particularly in relation to securing biodiversity opportunities for any new /extensions to minerals works.

We would also welcome a policy to secure developer contributions for biodiversity. A good example is the Scottish Borders LDP where a programme of offsetting has been set up to successfully deliver habitat management offsite (http://www.sup.org.uk/pdf/biodiversity-offset-schemes-in-the-borders-290212.pdf). NB: it is important any offsetting policies include a robust framework for consideration of biodiversity issues against the mitigation hierarchy.

We would like to take this opportunity to highlight that the SPP requires new LDPs to ‘use strategic flood risk assessment (SFRA) to inform choices about the location of development and policies for flood risk management’. In addition, the SPP requires that ‘policies should protect areas of peatland’ and also advises that ‘applicants should assess the likely effects of development on carbon dioxide (CO2) emissions’. This covers all developments, not just windfarms.

It may also be appropriate to consider including a policy relating to unconventional gas extraction. A significant area of the Loch Lomond and The Trossachs National Park is included in proposed licence areas for unconventional gas extraction currently being considered by DECC. This means that shale gas or coal bed methane proposals may come forward within the National Park. RSPB Scotland has concerns about unconventional gas extraction, particularly because the environmental impacts are not fully understood or the planning system adequately tested. A key risk is in relation to our climate targets: unconventional gas extraction is a high carbon fuel, and burning the gas contributes to global greenhouse gas emissions. Moreover, the impact of ‘fugitive emissions’ of potent greenhouse gas methane through leaks, and also emissions through planned flaring and venting has led scientists to argue that the climate impact of unconventional gas could potentially be greater than that of coal. Strict regulatory controls are also needed to avoid contamination of aquifers.

The new SPP removed the presumption in favour of unconventional gas that existed in the previous SPP and takes a precautionary approach. We support this position and believe that the risks associated with the extraction of these fossil fuels are unnecessary, given the potential for renewable energy in Scotland and need to transition to a low carbon economy. The ‘Are we fit to frack’ report produced by RSPB and other partners (http://www.rspb.org.uk/ourwork/policy/climatechange/action/ukenergy/fit-
to-frack.aspx) recommends that sensitive areas including National Parks are excluded from the licensing process. We would therefore welcome the application of a precautionary approach within the National Park, with the inclusion of an LDP policy that has a strong presumption against unconventional gas extraction.

Chapter Commented on: 2 National Park Partnership Plan >> 2.1 Vision for the Park >> 2.1.1

Vision Question 1: Do you agree with this vision?

Customer Reference: 00040 Organisation: (If applicable)
Customer Name: Joe Twaddle Comment Method: OLDP
Comment Reference: LDP01/MIR/CONS/00040/1/001 Customer Type: Individual Resident

Verbatim Comment:

We agree with the vision if it is adhered to. In the past tourism appears to us to have taken precedence and local residents are overwhelmed by visitor numbers. Other aspects of the rural economy need supported eg farming and it's associated skilled professionals.
Chapter Commented on: 2 National Park Partnership Plan >> 2.1 Vision for the Park >> 2.1.1

Vision Question 1: Do you agree with this vision?

Customer Reference: 00109
Customer Name: Christopher Sheldon
Comment Reference: LDP01/MIR/CONS/00109/1/001
Comment Method: OLDP
Customer Type: Individual Resident

Verbatim Comment:
I agree with the vision

Chapter Commented on: 2 National Park Partnership Plan >> 2.1 Vision for the Park >> 2.1.1

Vision Question 1: Do you agree with this vision?

Customer Reference: 00113
Customer Name: (If applicable)
Comment Reference: LDP01/MIR/CONS/00113/1/002
Comment Method: OLDP
Customer Type: Private Business

Verbatim Comment:
We agree with the vision for the Park, but would caution that planning restrictions imposed by the Park, SNH & SEPA, restrict development. Thus it is imperative that a balance is achieved between conservation and development - too often the former trumps the latter. If this continues then economic prosperity will be curtailed, resulting in the long term decline of the parks population and economy.
Main Issues Report Our Live Park Comments Received

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<tr>
<th>Customer Reference:</th>
<th>00145</th>
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<tr>
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<td>Comment Method:</td>
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<tr>
<td>Customer Type:</td>
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**Vision Question 1: Do you agree with this vision?**

Scottish Water support the vision of the National Park and have been working closely in their key agency role throughout the Local Development Plan process and will continue to do so as the Local Development Plan progresses.

Scottish Water is committed to enabling development within Scotland and will continue to work with the national park to highlight where there is available capacity within Scottish Water’s network. This allows development to occur in areas where the need to upgrade existing infrastructure is minimal, therefore reducing developer costs.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivpark.com
Comment 1: in relation to the vision set out on page 15, which is proposed to form the basis of the vision in the LDP, it is considered that the visitor experience section should also include reference to the special qualities of the Park, which are set out in the Park's statutory aims. It is also suggested that the vision be amended to include after the word 'enjoy', the following in parenthesis, '(including in the form of recreation)', as this is considered to be a significant aspect of the statutory aims, and should be reflected and translated into the policies of the park's LDP, and indeed its vision.
As a user of Loch Lomond for 40 years, I have noticed it has become busier and noisier place with lots of litter on the islands and in the loch. With noisy jet skies and speedboats churning up the waters near the Osprey erie in contravention of speeding by-laws, I am not surprised the ospeys never returned this year. The Park Authority could take a leaf out of lake District Park Authority and place a blanket speed limit on the whole Loch. After all they have been in business longer than ours and they felt it was necessary to do this to preserve what they had left before it was too late. They also commented to their jet Ski and speed boat users to go to Loch Lomond as we dont have speed limits. I suspect this survey is to dupe the public into believing we have some say—when in reality the expansion of Loch Lomond infrastucture will be rubber stamped and detract from the natural beauty, serenity and wilderness we once enjoyed. After all this Scottish Government will do anything to increase jobs and bring in tourism cash. The majority of the Park Authority principles are about economic considerations only one is about protecting the park ecology and nature.

Incidently, may I suggest that enforcing the present bylaws would be a start. I cant remember the last time I saw the Brigadier patrol boat or for that matter any ranger presence on the Loch at the speed limited area around inchmoan and inchfad. The authorities are not stopping craft speeding through this area where the ospreys used to nest. I think we should protect what we have left before we start attracting more people to the area.

Tom Weir was right, when thirty years ago, a contributer on his TV program commented that a Loch Lomond National park is the worst thing that could happen as Loch lomond would then be developed into a holiday resort and this fragile wilderness would be lost to our grandkids.
We agree with vision as outlined, in particular in relation to the third element identified - Rural Development i.e.: In the National Park businesses and communities thrive and people live and work sustainably in a high quality environment.

As Loch Lomond is one of the top visitor destinations in Scotland, the Vision is absolutely correct.
## Vision Question 1: Do you agree with this vision?

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<th>Customer Reference</th>
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<td>00148</td>
<td>Woodland Trust Scotland</td>
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</table>

**Verbatim Comment:**

Vision for the Park

We are pleased to note that the proposed vision for the Loch Lomond and the Trossachs National Park Local Development Plan will be based on outcomes which include, “Conservation - an internationally renowned landscape where the natural beauty, ecology and the cultural heritage are positively managed and enhanced for future generations.”

Please see Appendix 6 for further information

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<tr>
<th>Customer Reference</th>
<th>Organisation</th>
<th>Customer Name</th>
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<td>00150</td>
<td>Argyll and Bute Council</td>
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**Verbatim Comment:**

Vision Q1 :- Argyll and Bute Council support the vision and welcome the opportunity to work with the National Park as appropriate to deliver these aims for the benefit of the people of Argyll and Bute.
Section 2.2 page 16, re the ‘pink’ areas on the plan - these are described as ‘smaller scale tourism potential in the countryside’. This section is too vague to allow considered response and KCC would request further details in what the implications are within these areas and how they might apply to the area around Gartocharn.

The priority scenic road corridors along the A82 and A83 as identified in the spatial development strategy, are supported, as are continued improvements to these (such as Tarbet to Ardlui) in recognition of the strategic importance of these in providing access to north and west Argyll. The identification of smaller scale tourism opportunities in the country side to the north and south of Loch Eck are welcomed, recognising the opportunities which adjoining settlements outwith the Park boundaries can provide as service centres.
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 2 National Park Partnership Plan >> 2.2 Delivering the National Park Partnership Plan >> 2.2.1

Customer Reference: 00109
Customer Name: Christopher Sheldon
Comment Reference: LDP01/MIR/CONS/00109/1/002
Comment Method: OLDP
Customer Type: Individual Resident

Verbatim Comment:
I do not agree with the exclusion of Gartmore from the areas with small scale tourist potential on the map on P16 of the Main Issues Report.

Chapter Commented on: 2 National Park Partnership Plan >> 2.2 Delivering the National Park Partnership Plan >> 2.2.1

Customer Reference: 00113
Customer Name: Luss Estates Company
Comment Reference: LDP01/MIR/CONS/00113/1/003
Comment Method: OLDP
Customer Type: Private Business

Verbatim Comment:
West Loch Lomond side should be shaded in red for small scale tourism potential in the countryside. With the A82 bisecting this area, the opportunity for development is enormous. We assume that economic development would be supported in this area.
2 National Park Partnership Plan >> 2.2 Delivering the National Park Partnership Plan >> 2.2.1

Sportscotland is the national agency for sport. Our vision is a Scotland where sport is a way of life. We share in the vision from ‘Let’s Make Scotland More Active’ - ‘A strategy for physical activity, that, by 2020 people in Scotland will be enjoying the benefits of an active life’. This is intrinsically linked to the 5 strategic objectives that unite all public organisations in the country: wealthier and fairer, smarter, healthier, safer and stronger and greener. The availability of a network of places, of the right quality and capacity to meet the needs of sport, is crucial to deliver these objectives.

Sportscotland has a statutory planning role as set out in the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 in relation to outdoor sports facilities, and playing fields and pitches.

We support and advise Councils and Trusts on the preparation of Sports Facility and Pitch Strategies, including the provision of financial support towards the cost of their preparation. Undertaking these strategies, potentially as part of a wider open space strategy, can make an important contribution to the local development plan process and we encourage their preparation. In relation to this, Sportscotland can undertake Facility Planning Modelling for various sports facilities. This can assist in the identification of potential deficiencies in facility provision in an area as well as assisting in identifying the sports facility requirements of development proposals.

Sportscotland has produced a number of documents which can contribute to the preparation of Local Development Plans, particularly where there is new development proposed. Guidance includes School Playing Fields - Planning and Design Guidance; Secondary School Sports Facilities - Designing for School and Community Use; and Primary School Sports Facilities. These are available in the Facilities section of our web site.

Sportscotland also has a remit for sport and physical recreation in the countryside/outdoors. Our position on sport and recreation in the outdoors is set out in our policy document Out There. Out There sets out a number of polices relevant to the planning of sport and recreation in the outdoors and is available on the Sport in the Outdoors section of the sportscotland web site.

The Sportscotland Sports Facilities Fund can provide capital support for the development of community sports facilities. Details of the fund are set out on the Facilities page of the sportscotland web site www.sportscotland.org.uk.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
3 Current Planning Policy - The Local Plan >> 3.1 Strategy summary

Customer Reference: 00040
Customer Name: Joe Twaddle
Comment Reference: LDP01/MIR/CONS/00040/1/002
Organisation: (If applicable)
Comment Method: OLDP
Customer Type: Individual Resident

Verbatim Comment:
Agree, although tourism encouragement is in danger of cancelling the positive responses and the Park becoming just too busy --infrastructure as an need of upgrading.

3 Current Planning Policy - The Local Plan >> 3.2 Progress in delivering the strategy - key trends >> 3.2.1

Customer Reference: 00113
Customer Name:
Comment Reference: LDP01/MIR/CONS/00113/1/004
Organisation: Luss Estates Company (If applicable)
Comment Method: OLDP
Customer Type: Private Business

Verbatim Comment:
The measure of success should be construction, not approvals.

Luss Estates have a number of approved developments which will not be built due to the planning conditions included in the Approval.
Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options?

Customer Reference: 00040
Customer Name: Joe Twaddle
Comment Reference: LDP01/MIR/CONS/00040/1/004

Verbatim Comment:
There are a number of problem areas where the Access laws do not work and the establishment of bye-laws seems a good solution. These must be enforced and the reasons for them highlighted by proactive interaction with the problem visitors.

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options?

Customer Reference: 00107
Customer Name: Non Attributable
Comment Reference: LDP01/MIR/CONS/00107/1/077

Verbatim Comment:
Jetskis, power boats are seen as something that must be restricted.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivelpark.com
### 4 Identifying the Main Issues - what needs major change and what are the options?

<table>
<thead>
<tr>
<th>Customer Reference:</th>
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<th>Organisation:</th>
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<td>Comment Method:</td>
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**Verbatim Comment:**
You have made Loch Lomond into a *********** you can't do anything without somebody breathing down your neck. It also feels like you have two sets of rules, one for us and them and don’t forget about the *********** they have their own rules. I had more access to the park 20 years ago than I do now. THE LOCH IS NOW SOMETHING TO DRIVE PAST TO GO SOMEWHERE ELSE. *****************************.

<table>
<thead>
<tr>
<th>Customer Reference:</th>
<th>00047</th>
<th>Organisation:</th>
<th>Kilmun Community Council</th>
<th>Customer Type:</th>
<th>Local Public Body</th>
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<tr>
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**Verbatim Comment:**
We are pleased to see Blairmore mentioned under Tourism & Visitor, but believe Kilmun (especially with the Mausoleum) and Strone should be included.

Population Change. (27) We do not see anything in your report to address the negative population statistics that are predicted for the future. We consider it is vitally important that this aspect is addressed for the future economic viability of our local area.
4 Identifying the Main Issues - what needs major change and what are the options? >> 4.1 Drivers for change

Customer Reference: 00047
Customer Name: Kilmun Community Council
Comment Reference: LDP01/MIR/CONS/00047/2/009
Comment Method: EMAIL
Customer Type: Local Public Body

Verbatim Comment:
Renewable Energy. We agree with the comments on Renewable Energy.

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.1 Drivers for change

Customer Reference: 00073
Customer Name: Tactran
Comment Reference: LDP01/MIR/CONS/00073/1/001
Comment Method: OLDP
Customer Type: Public Body

Verbatim Comment:
Tactran broadly supports the MIR. Whilst it is agreed that investment is needed in roads and car parks consideration also needs to be given to ensuring that sustainable alternatives, in terms of public transport access, walking and cycling, continue to be given a high priority for visitors and residents in considering development in the Park.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivelpark.com
Section 4.1 Pg. 35, 36 Drivers for Change

We comment here only on those matters relevant to conservation of mountains and quality of mountaineering experience.

The MCofS supports the comments made in the MIR on renewable energy and wild land. While we commend the attention paid to ensuring that renewable energy schemes fit unobtrusively into the landscape, it is too early to be satisfied that reinstatement, particularly of access tracks, will be of sufficiently high quality and sufficiently durable not to require further remediation. We trust that this will continue to be closely monitored.
### Identifying the Main Issues - what needs major change and what are the options? >> 4.1 Drivers for change

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<th>Customer Reference:</th>
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<tr>
<td>Customer Name:</td>
<td>Anne-Michelle Ketteridge</td>
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<tr>
<td>Comment Reference:</td>
<td>LDP01/MIR/CONS/00115/1/004</td>
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</table>

**Verbatim Comment:**

Also technological changes which impact on the way we live or work - particularly the ability to work from home for all or part of their employment. This impacts on the range of employment sectors that are now possible/already happening in the Park. A second significant driver of change in the Park area will be public sector cuts which are happening across Scotland, but particularly in Stirling. This will impact on the services being provided in the Park but also means that the public sector will no longer be as significant an employer in the area, possibly fewer people in employment and likely less funding available for training opportunities.
Wild Land

We support the position on page 36 of the MIR in relation to wild land; that ‘maps provide a clearer basis for managing appropriate development and activity in these areas’. We support the recognition this gives that some forms of development may be appropriate in wild land. This is in line with paragraph 200 of SPP 2014, which indicates that plans should identify and safeguard the character of areas of wild land as identified on the 2014 SNH map of wild land areas, and paragraph 215, which states that development in wild land may be appropriate in some circumstances.

Energy and Heat Networks

NPF 3 (pages 34 -36) sets out the principles for rural communities in terms of renewable energy and heat networks. Key considerations for the National Park could include more detail on how it intends to assist in planning for a low carbon economy; helping to address increasing energy costs and fuel poverty. In addition the plan should identify how planning policy will be used to assist in improving the energy efficiency of homes and businesses as well as being supportive of appropriate energy development. Page 30 of the MIR partially addresses this, and highlights sustainability as a proposed overarching theme in the LDP. This is however fairly light in detail; beyond referencing the climate change act requirements and stating policies would be updated to ensure compliance with this. More detail on how this is likely to be applied in the LDP would have been helpful.

We would highlight that there may be opportunities for establishing heat networks in the National Park, most likely within the largest settlements and where new development is proposed; particularly larger tourist related developments (see paragraph 3.26 of NPF 3 and pages 36-38 in SPP 2014). There could also potentially be geothermal opportunities in the area. The LDP should seek to address and assist with heat network establishment. SPP 2014 and NPF 3 are clear that LDPs should use heat mapping to identify potentially suitable locations for creating heat networks. Scotland’s heat map is now available online at: http://www.scotland.gov.uk/Topics/Business-Industry/Energy/Energy-sources/19185/Heat/HeatMap for authorities to use. There are examples of how other authorities have used heat maps in preparing their plans, including Fife and Perth and Kinross.
Waste and Minerals/ Natural Resources

It is noted that there is a lack of reference in the MIR to minerals and waste, although it is recognised that these are not considered ‘main issues’ for the National Park. In terms of taking minerals and waste policy forward, the NPA should ensure that policies are supportive of planning for zero waste and in promoting responsible extraction of resources in compliance SPP 2014 and NPF 3.

Flood Risk

We support the statement on page 36 of the MIR on flood risk management which recognises that ‘sustainable flood risk management is central to policy and decision making’. SPP 2014 is clear in paragraph 256 that the planning system should ‘prevent development which would have a significant probability of being affected by flooding or would increase the probability of flooding elsewhere’. Paragraph 256 of SPP 2014 stipulates that development should be located away from functional flood plains and areas of medium high flood risk. The flood risk framework set out in paragraph 263 of SPP 2014 should be used to guide development and Flood Risk Assessment applied in accordance with the Framework.

Green Infrastructure

SPP 2014 identifies that ‘development plans should be based on a holistic, integrated and cross-sectoral approach to green infrastructure’. We note that the existing policies relating to open space are to be reviewed. SPP 2014 states that LDP’s should seek to enhance and promote the creation of new green infrastructure and that this should be done through a design-led approach, applying standards which facilitate appropriate provision, addressing deficits or surpluses within the local context.

Spatial Strategy

We welcome the approach taken to the spatial strategy which forms part of the MIR. The mapping clearly sets out the preferred and alternative site options and the narrative demonstrates links between the engagement process and the identified options. We found the spatial strategy mapping / graphics to be very helpful and feel this demonstrates the benefit to have visually-led plans that communicate the overall development plan vision and the long term strategy for settlement growth. We consider that the engagement undertaken as part of the charrettes is demonstrated effectively through the MIR.

Supplementary Planning Guidance

We note the reference within the MIR to the production of statutory Supplementary Guidance and the list of possible Supplementary Guidance documents within the ‘Policy List and Action Summary’ document. In preparing the Proposed Plan and considering the content of statutory Supplementary Guidance, we would emphasise the importance of compliance with section 27 (2) of the Town and Country Planning (Development Planning) (Scotland) Regulations 2008. In terms of volume of statutory Supplementary Guidance it is important that this is proportionate, as the Plan as a whole (policy and guidance) needs to be accessible to the reader.
Moving forward to the Proposed Plan and preparation of the Action Programme, we would remind you of the requirements for Action Programmes as set out in Circular 6/2013. Paragraph 130 requires that Action Programmes must set out:

- a list of actions required to deliver each of the plan's policies and proposals;
- the name of the person who is to carry out the action; and
- the timescale for carrying out each action.

The Action Programme is a key tool in delivering allocated sites identified through the Plan. One of the policy principles of SPP 2014 is that the planning system should have a sharp focus on the delivery of allocated sites embedded in action programmes. Consideration should be given to this as the Action Programme is progressed.

Concluding Comments

We encourage the NPA to continue to follow an evidence based approach to developing the Proposed Plan. Taking account of the evidence presented, focusing the main issues on rural economy, visitor experience, infrastructure & services and housing, appears to be a credible approach moving forward.

Overall, we consider the MIR strikes a good balance between identifying the big ideas for the future development of the National Park and also being site specific, setting out the detailed proposals for development.

The Proposed Plan should contain details of how the Authority intends to contribute to the national actions set out in NPF 3 and as progress is made towards the Proposed Plan appropriate regard should be had to the expectations for development plans as contained within SPP 2014.
### Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.1 Drivers for change

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<tr>
<th>Customer Reference:</th>
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<tr>
<td>Customer Name:</td>
<td>Gavin MacLellan</td>
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<tr>
<td>Comment Reference:</td>
<td>LDP01/MIR/CONS/00193/1/008</td>
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<td>EMAIL</td>
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<tr>
<td>Customer Type:</td>
<td>Individual Resident</td>
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**Verbatim Comment:**
Young person population decline: the NP has brought uncertainty and social engineering which have a negative effect on entrepreneurs. Planning cycles are too short and the economic value of the rural community is possibly declining due to changes. The reputation of certain development projects contributes a risk that business people will avoid. Question: is this a good place to set up shop?

*If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com*
I believe that there is a public forum in place to air opinions and ideas of what the public want to see happening with their National Park and that this forum will close on Monday. I am concerned that I have been unable to find this forum and that people will not be able to make their opinions known. Therefore I am writing to you in frustration and in the hope that my personal views will be heard.

I am a regular visitor to Loch Lomond and it is a place very dear to me. I had hoped that the purpose of awarding national park status was to protect the natural beauty of the area and limit development not promote it. I understand there is a need for local employment and economic stability but surely there must be ways to provide this without destroying the whole reason people visit in the first place.

Having been very disappointed in the changes that have happened so far, I am really dreading any future plans. As an art hobbieist and enthusiast I normally love big outdoor art installations but The Geese at Balloch roundabout don't seem to add anything to the landscape, if anything they detract from it. And whatever idiot that visited this place of outstanding natural beauty and biodiversity and decided that what it lacked was a shopping centre, needs their heid examined. Yosemite and Yellowstone both American and even they don't have a bloomin' shopping mall.

I really hope that the powers that be decide to restrict future development and only grant permission to outstanding projects that blend in with the environment, using local materials and labour. It would be fabulous if more resources went to create jobs maintaining the landscape, repairing old rotten jetties and eroded footpaths, clearing litter, tourism, nature reserve/ observation areas, research into reducing the midgies and ticks (ok sounds a step too far but would help a lot) etc.

Thanks for reading my rant, if somebody did and I really hope that we won't one day look back in sad nostalgia saying remember when all this was green and wild and wonderful.
### Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.1 Drivers for change

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<tr>
<th>Customer Reference:</th>
<th>00209</th>
<th>Organisation: Scottish Campaign for National Parks</th>
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<td>Customer Name:</td>
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<tr>
<td>Customer Type:</td>
<td>Other Organisation</td>
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**Verbatim Comment:**

SCNP has long been concerned about the damaging impact of windfarms on sensitive landscapes and habitats. The Park Authority’s recognition of this is most welcome. This has not deterred the wind energy industry from pursuing schemes on the edge of the national park which if approved would have done irreversible harm for the lifetimes of many people. The park must be very alert to these dangers and, notwithstanding government’s advice, recognise that in reality buffer zones are an essential tool if these iconic landscapes are not to be damaged for at least the planned 25 year lifespan of the current generation of turbines.

Progress on small run of river hydro schemes seems to be being achieved without serious adverse impact and this is to be welcomed. The park needs to be on its guard however, wherever access to service such schemes requires long new access tracks. There are now examples in remote areas where the greatest impact is the scar created by the access track. The potential cumulative ecological impact of these schemes should also be examined.
Drivers for change Q1
Under the ‘Sustainability’ driver it is noted that the Park proposes a LDP policy to comply with Section 72 of Climate Change (Scotland) Act 2009 in relation to low and zero carbon technologies. It may be of interest that Stirling Council included a policy with this aim in its Proposed Plan; policy 4.1, which is supported by Supplementary Guidance 17. The Proposed Plan has been through Examination and this policy was accepted without recommendation by the Examination Reporters.

Drivers for change Q1
Further investment must be made into better public transport on Loch Lomond and the acquisition of all piers into public ownership. One aim must be to provide a cross-loch water-based transport system the length of the loch; and this can only be done if all piers are taken out of private ownership because this at present is a serious restriction to access.
Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.1 Drivers for change

Customer Reference: 00150
Customer Name: 
Comment Reference: LDP01/MIR/CONS/00150/1/010
Organisation: Argyll and Bute Council
Comment Method: EMAIL
Customer Type: Local Government

Verbatim Comment:
Renewable Energy

It is noted that there has been an increasing number of proposals for commercial windfarms close to the parks boundary. The proposed Argyll and Bute local development plan windfarm policy map seeks to set out how applications for such development will be assessed, this follows the methodology recommended in the SPP and online guidance from the Scottish Government. There are no preferred areas (broad areas of search) identified adjacent to the National Park boundaries.
Section 4.1-a key issue here is the demographic changes especially in the older age groups. This will have a major impact on the NHS as well as housing requirements. Whilst the National Park has to take opportunities as they come its not clear to me from this report how you intend to respond in housing terms to a frailer older population. The availability or otherwise of relevant specialized housing for older people and older people with dementia is not even mentioned and yet in the NP there is limited provision.
Identifying the Main Issues - what needs major change and what are the options? >> 4.1 Drivers for change >> 4.1.1

The Park has very significant renewable energy resources which remain largely undeveloped. The Park should have ambitious targets for renewable energy generation and low carbon building which aim to achieve a Park-wide zero carbon community over the next 20 years. Some local communities are already benefiting economically from local renewable energy schemes but many communities do not have suitable sites within their boundaries. There should be a system in place for the development of sites within the Park where the income is put into a central fund for the benefits of all the communities in the Park. Small scale hydro schemes are preferred, but other technologies including wind should not be excluded, provided their visual impact and environmental effects are carefully considered.
This section should mention the "Luss Strategic Development Framework", published in 2013, which is fully supported by the National Park, and which constitutes a locally funded charrette? It is our view the population change section misses the point regarding the role and place of the Park. The National Park is surrounded by enormous economic engine rooms; Faslane, Helensburgh (and train station), Balloch/Lomond Gate/ Vale of Leven, Glasgow airport and Glasgow. The Park cannot live in isolation to these, commuting must be a large part of the future development of the south of the Park, and thus the population and employment in these parts is of enormous relevance to future strategy.

This element of the report also underplays the importance of the local economy. If the Park as planners are able to unleash local entrepreneurial flare, and support strong local business growth, then many other things will drop into place, such as housing. Economic growth, and how to promote it, must come first.

The section on visitor experience fails to mention the blight of irresponsible wild camping on the Loch Lomond islands, and on the west bank of Loch Lomond, to which a solution is urgently needed.

Renewable energy; the role of wind power should not be ignored, especially as the economics of small scale hydro become more marginal, as planning conditions drive up costs. Approvals do not equal construction, and the real measure of success is what happens in reality - grid connections problems and planning conditions mean that a sizeable proportion of consented hydro schemes will not be built. The spike in 2013 is due to national government policies.
Do you agree with summary outlined? Is there anything we have missed?

Internal demand, the views of the locals, can drive change, 'external' factors such as the desire to retain young people in the park and check the trend of falling population are equally important drivers. Some aspirations such as improvements to the public realm, or infrastructure, quality of the built environment, and establishing Callander as the outdoor capital should be prioritised because they clearly have the potential to achieve both the aims of locals and the wider social aims of establishing a more balanced and sustainable population.
We note and agree with the summary of broad issues raised. In particular, in relation to housing we agree that:

- The NP remains one of the most expensive areas to buy a house and many are purchased by buyers from outwith the area.
- There continues to be high levels of need for affordable housing – especially within the Stirling Council area
- There have been very low rates of housing development over the last few years with little affordable housing having been delivered.
- New housing is needed to ensure that young people and working families can stay and can afford to move to the NP.
- There is more housing pressure/demand on the South and Callander.

We also note that the background to all of this is a projected overall decline in the NP population of 11% by 2035; with particularly marked reductions in the numbers of young people under 16 (29%) and people of working age (23%) but with a projected 24% increase in the numbers of those of pensionable age.

The accuracy of projections over such a long-timescale is difficult to gauge and many factors could intervene to influence the actual outcome. We also note that, notwithstanding the projected population decline, it is still anticipated that the overall number of households in the Park will slightly increase over this period.

However, it is clear that there are some very worrying trends in process which have potentially serious implications for the long-term sustainability of the NP communities and for demand for services.

The absence of area-specific projections is unfortunate (although obviously difficult given small numbers involved) but our assumption is that, in the Stirling area, these challenges are more acute within the area to the north of Callander which are more remote from the employment opportunities within the central belt.
We agree that facilitating new housing provision, of a range of house types and tenures, in appropriate locations, is an important part of trying to address this challenge. Other changes -economic, infrastructure etc - will also be required.

There continues to be a need for new affordable housing. This should predominantly be social rented housing (the most affordable type) but we agree that, as part of the task of generally retaining and attracting younger households, that there is also an important role for other types of affordable housing (for rent and purchase). Needs and demand for these different types of affordable housing will vary from area to area.

We also agree that a wider range of market housing - especially smaller homes and accommodation designed to facilitate down-sizing by older households - is required.

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.1 Drivers for change >> 4.1.1

Do you agree with summary outlined? Is there anything we have missed?

Customer Reference: 00150

Customer Name: Argyll and Bute Council

Comment Reference: LDP01/MIR/CONS/00150/1/003

Comment Method: EMAIL

Customer Type: Local Government

Verbatim Comment:
Population change is the biggest challenge facing Argyll and Bute, the overarching aim of the Argyll and Bute Community Planning Partnership is that Argyll and Bute’s economic success is built on a growing population. The council welcomes the recognition of this challenge as an overarching issue throughout the Main Issues Report.
Parking is of great concern in the towns and consideration for public and resident parking must be addressed. In Drymen Charles Crescent is on street parking mostly but the grass burn could be cut into to provide off street parking. Drymen and Balmaha both suffer from parking problems which need to be addressed. I am glad to see there are proposals to improve travel between the two on public paths and with buses which could provide popular and are eco friendly. It would also encourage businesses such as cycle hires.

Bus transport is alright in the park but not amazing. There are also areas such as Balmaha and the parking for Ben Lomond which simply have too many people driving too. A suggestion here would be improved planning with bus services and promotion to park in Balloch with regular ‘hill walker’ buses taking individuals from the train and bus in Balloch to Conic Hill and Ben Lomond - yes there are buses for this today but the evidence is clear many more people drive out there and park anywhere they can.
**Chapter Commented on:** 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.2 Summary of the main issues

**Customer Reference:** 00185

**Customer Name:**

**Comment Reference:** LDP01/MIR/CONS/00185/1/010

**Verbatim Comment:**

We acknowledge that a focused set of main issues have been identified within the MIR and are content that this incorporates the NPA’s big ideas for change within the National Park.

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**Chapter Commented on:** 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions

**Customer Reference:** 00040

**Customer Name:** Joe Twaddle

**Comment Reference:** LDP01/MIR/CONS/00040/1/006

**Verbatim Comment:**

Support the housing policies including the support by open market housing-but are against the sale of affordable housing by landowners after 10yrs. these should always be rented accommodation.

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*If you feel any information in this report is incorrect please contact us by email at hello@ourlivelpark.com*
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<tr>
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<th>4 Identifying the Main Issues - what needs major change and what are the options? &gt;&gt; 4.3 Main issues, potential options and solutions</th>
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<td>Customer Reference:</td>
<td>00040</td>
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<tr>
<td>Customer Name:</td>
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<td>Customer Type:</td>
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<tr>
<td>Verbatim Comment:</td>
<td>While welcoming a bespoke approach to planning for the East Loch Lomond area we would emphasise that this should concentrate on improvements to infrastructure, integrated transport provision and outdoor activity opportunities. This area has been recognised as a place of quiet recreation in past accolades and care must be taken to maintain this.</td>
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<td>Customer Type:</td>
<td>Individual Resident</td>
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<tr>
<td>Verbatim Comment:</td>
<td>Affordable housing should be supported as a priority. Sustainable communities are now in danger because of the imbalance of tourists demands/residents way of life</td>
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### Main Issues Report
Our Live Park Comments Received

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<th>Chapter Commented on:</th>
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<th>4.3 Main issues, potential options and solutions</th>
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<td>Customer Reference:</td>
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<td>Organisation: Kilmun Community Council</td>
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<tr>
<td>Verbatim Comment:</td>
<td>With the predicted reduction of population we question the need for so many additional houses.</td>
<td>Customer Type: Local Public Body</td>
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If you feel any information in this report is incorrect please contact us by email at hello@ourlivelpark.com
We also agree that there is a lack of and poor visitor infrastructure. Toilets are vital for tourism - this is often highlighted by the tour operators! However until Argyll & Bute Council decide to address this issue we do not believe that the Park will have the 'wherewithal' to address these issues in our area.

We believe small-scale tourism will not address the predicted reduction of 29% in school age children and increase of pensioners by 24% during the next 21 years. You state on page 54 Visitor surveys highlight the importance of good quality facilities/services, such as toilets, car parks information and broadband with the exception of broadband this is not being addressed in our area.
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Verbatim Comment:
Main Street improvements overdue. Rural housing needed. Private housing also required for balanced community.
I can't remember where I saw the article about the new 'sculptures' at Lochs Voil and Venachar, but it just seems like yet another grandiose idea to 'enhance' the scenery which of course needs no such thing. It's just like those masonry signposts you've put up supposedly to alert people to a nice view of the place they're approaching - they're just distracting. The one on the A84 just west of the Cambusbeg quarry entrance does mark a good view of Ben Ledi through the trees, but there's nothing to tell the visitor that - and of course there's nowhere to stop and enjoy the view. It's the same with the one west of Tyndrum: the view speaks for itself and you really wouldn't want to try stopping there. I heard recently that the Five Lochs project had been scrapped because funds had run out: far better to keep that going and provide visitor facilities like toilets and parking than to instal meaningless 'sculptures'.
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Verbatim Comment:

Water is one of the main draws to the park and protecting and preserving these resources is a . It saddens me to tell you that having organised a trout survey on loch Venachar this year the spawning burns are in terrible condition and several devoid of trout juveniles. This is due to several reasons which I shall not go into now but ultimately are due to over stretched and under resourced management. Principally because now all, instead of part of the revenue is needed to fund policing and tidying of the banks, there is not enough revenue to restock the loch. This over stretching of resources is a function of the National Parks popularity and whilst I except that the Parks existence is a great thing, it is ultimately slowly depredating one of its greatest natural resource, that being its lochs.

More funding must be found to develop rubbish facilities, more Park Ranger patrols, free fire wood schemes and no parking barriers. Toilet facilities wouldn't go amiss either as people are simply ignoring Park rules within the prohibited distance of the loch which I believe is 15m. So before you go ahead and come up with new schemes how about finishing the ones you have pledge to do for years. Just a thought.
Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions

Customer Reference: 00107
Customer Name: Non Attributable
Comment Reference: LDP01/MIR/CONS/00107/1/044
Comment Method: ONLINE
Customer Type: Information not available

Verbatim Comment:
Time to build an underwater hotel / sky scraper.
## 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions

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**Verbatim Comment:**

As frequent visitors to Loch Lomond from the city as a quiet getaway we don't feel that any major developments such as, large (chain) hotels, restaurants, and overpriced unattractive tourist centres should be installed to the already beautiful surroundings. Not only would this provide hardship for small, local businesses, but would also create an overcrowded destination. By leaving the city to a village such as Luss for a day or two, can provide a relaxing break from busy cities and overcrowded towns.

If anything, spend money on existing local business to allow the opportunity to expand and provide locals with job options. Also putting money in to restoring existing nature paths/trails, the upkeep of original features and roads/pavements would be a great step in reviving already great destinations!
Loch Lomond National Park is such a special place and its resources could be utilized more fully if the Loch itself could be linked to the River Clyde and thus enable boats and their owners direct access to the Loch which would be beneficial to both the local economy and visitors alike.
If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com

Having lived in Scotland and been visiting the "area" for over 40 years, making the park more accessible will ultimately have the detrimental effect of ruining the atmosphere and tranquility of the space. Therefore any road improvements should only be to make them safe not for widening the roads, thus allowing more vehicles to access. In addition to the above any new tourist facilities should only be to replace existing locations. If the idea is continued "growth" as is detailed then the area will effectively end up becoming like the Lake District, which is too commercialised.
### Main Issues Report Our Live Park Comments Received

**Chapter Commented on:** 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions

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**Verbatim Comment:**
Build a road from Rowardennan to Inversnaid and at later date continue the road to Ardlui. Also build a road along the south side of Loch Katrine to Stronaclachar making the Park more accessible from Callander, Aberfoyle and Drymen and providing circular routes to assist in an increase in tourism and improve the local economies of these villages.
I strongly object to Lochs and Glens hotels being allowed to purchase Ardgartan Estate, then evict the Camping and Caravan Club and the Caravan cCub from the great sites they had on the estate, then they sold Ardgartan campsite to the Forestry Commission who after a few years excluded campers and caravans and made it log cabins only, this estate was bought in the 1930's and was to be used to get ordinary people out of the city and to enjoy a healthy holiday in the country, me and many other people are furious about this. I have complained many times but just got fobbed off. There is something wrong with this, and no one wants to tell the truth. That area was used by thousands of people but now it is only for a few rich people. My family used Ardgartan for 50 years, now we and many like us have been turned away.
Landowner areas, no longer manage their woodlands, oaks, hedgerows or rivers, knotweed etc on Fruin river. It would be beneficial to involve tenants/farmers by providing bonus/payment where environmental practices are put in place, e.g., 1 metre protection area around hedgerows (very successful in Stirling area), knotweed/balsam removal, planting of deciduous trees etc.

Development of housing/hotels/should be concentrated in villages, a good example of how well this can be done, is the Yorkshire/Peak Districts. I travel widely, and the comment most often made by people, is the destruction of beautiful/wild locations by over development.
Having tried for some time to plough through Main Issues Report I have to conclude that it was written by a team of Lawyers from Philadelphia. I cannot imagine any other body who would present such a document to the public. To me it would appear to be a confuse em, not consult em, sort of a document.

If I read correctly you are attempting to take total control over all activities in, on and around the area and to put a stop to any form of wild camping.

As I see it, your remit is to conserve and protect this most beautiful of places. To me this means making sure that the landscape stays untarnished by commercial development so that future generations can enjoy it as it has always been. Instead of which you appear to be putting your energy into stopping people drumming up by their campfire as they have done since the proverbial Adam was a boy.

In the big scheme of things you have only been here for five minutes but to us, the locals, like the American Indians in the 1800's it feels like we are constantly having to fight to save our lands and preserve our way of life.

Ultimately you will have your way but I would ask you to remember that as time moves on, sympathy is with the Indians. Sorry but I just can't help myself thinking about George Custer. Ok, that was naughty but my point is simply that there is no need for all this regulation.

Can I humbly suggest that you try working with people. By all means you should try to educate visitors, give them reason why they shouldn't damage the area but less of the over regulation and bye laws please. All that serves to do is anger and alienate those of us who live and work here.
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions

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<td>ONLINE</td>
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Verbatim Comment:
It would seem that new council housing developments are taking precedence over current National Park guidelines and the needs of the existing residents. The infrastructure is not in place to service current residents so adding to the numbers will just accentuate the problem.

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions

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Verbatim Comment:
What currently takes place is that water skis launch at Millarochy Bay which is managed by LL&TNP. The water skiers then move further up the Loch where they are not monitored by the Park Authorities and cause mayhem and disturbance to other lochside users. Specifically adjacent to the Sallochy campsite. The zone for restricted motor boat speeds should therefore be extended at this location.

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In the first instance we oppose the suggestion to allow the sale of affordable housing after a 10 year period. The proposal for a new planning approach - Rural Development Framework Area - is a welcome initiative. Page 42 highlights the suggested priority headings and we support these - in particular the infrastructure improvements. We look forward to being active partners in the decision making process and welcome immediate involvement. We would also welcome a process by which the community views can be seen to be effective in influencing any decisions made. The Charrette findings were disappointing for us as a whole but if this new process is a result from that there has been a positive outcome. We look forward to the start of this collaboration and would like any details of initial proposals that you have identified.

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In particular, Tactran supports building on the opportunities identified through the National Park Tourism Strategy and National Park Partnership Plan for: additional facilities and improved infrastructure, scenic routes, viewpoints and paths which will incentivise private sector investment and provide supporting services, and grow ... 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).
Dundas Estates has approached the landowner about developing the site (MIR 37a). Its proposal involves the provision of 64 homes on land to the west of the A81. Of these 64 homes, 25% (16 homes) will be affordable homes.

This proposal requires the allocation of an additional 2.1 hectares of land to the west of MIR 37a to deliver an effective housing site. This expansion of MIR 37a is illustrated on the attached drawing 12027-ST-P008 MIR LDP Proposed Sites with Proposed Extension to MIR 37a. The developer requires the additional allocation of this small area of land to ensure that the site is effective for the following reasons.

The proposed extension will increase the capacity of the site. This increased scale of development will provide an economic scale of development necessary to finance future infrastructure costs. This proposed development of 64 homes is capable of delivery in the first 5 year period of the LDP.

The Landscape Capacity Assessment identifies that there is landscape capacity to accommodate further development on site MIR 37a. The proposed additional land lies on lower ground than the existing built form to the north (Katrine Crescent). The topography of the land is also such that the land rises to the west. The existing landform will therefore provide visual containment for the proposed expansion of MIR 37a. This is in accord with the Landscape Character Assessment, which confirms that any development should avoid the higher, exposed areas.

As the LDP progresses to Proposed Plan stage, it is necessary to provide a clear indication of the boundaries of allocated sites. Extending MIR 37a, as illustrated on the attached plan (Dwg. 12027-ST-P008), will ensure that the site is effective. There is capacity within the existing landform to visually contain this proposed small extension.

Proposed Overall Allocation
The landowner is committed to a masterplanned approach to the development of sites MIR 37a and MIR 37b, working in a partnership approach with the NPA. This approach will ensure that appropriate mitigation measures are identified and adopted with a development programme ensuring the timely delivery of infrastructure. SPP requires that local development plans should allocate appropriate sites to support the creation of sustainable mixed communities and successful places and help to ensure the continued delivery of new housing (paragraph 122).

Together, sites MIR 37a and MIR 37b deliver homes, support tourism development and provide jobs in the long term. This is in accord with SPP (paragraph 122). The proposal promotes the cohesive, sustainable, long term economic growth of Callander, in accord with SPP, (paragraph 15), and Policies RD1, RD2, RD3, RD7 of the National Park Partnership Plan 2012-2017.

There will be no built development within any identified flood risk areas. There is developer interest in developing this site. The proposal is effective in accord with the tests set out in PAN2/2010 (see below).

PAN 2/2010 Test Compliance

Ownership - Site is owned by a party willing to release for development. Developer interest in the site.

Physical - Site free from physical constraints - no development to take place in flood risk area. Contamination - Previous use of land unlikely to have resulted in any contamination.

Deficit Funding - No public funding necessary for development to proceed.

Marketability - The site is marketable, strong demand for new homes in Callander. Already, circa 70 homes are identified to be developed within Plan period. Other uses will follow in due course.

Infrastructure - No significant infrastructure requirements for first phase. Development of later phases can deliver education and transport infrastructure as required following more detailed impact assessments.

Land Use - Housing and tourism development are the key components of the proposed development.

Recommendation

The NPA's Preferred Option for Callander is not supported. For the reasons set out above, Option 1b provides the optimum solution for the necessary identification of additional housing land, tourism destination, and the planned delivery of infrastructure. Option 1b is in accord with SPP and policies within the National Park Partnership Plan 2012-2017.
The site boundary of MIR 37a (Claish West) should be amended to increase the allocation by a further 2.1 hectares to reflect the developer interest in delivering an effective site as shown in Dwg.12027-ST-P008.

The proposed allocations (Claish East and West) will deliver the key infrastructure required for the long term growth of Callander. It is logical that the long term strategy continues to focus on the area south of MIR 37a and MIR 37b, supporting NPA’s Preferred Long Term strategy. This is also in accord with SPP. (LOCATION MAP AND SUPPORTING INFORMATION APPENDED)

Please see Appendix 4 for further information
I have visited Loch Lomond and the Trossachs for most of my life. For the past ten years I have toured the area with my father and Russian, French, Spanish, German and Japanese students. This has let me see the area through the eyes of others from different countries. Seeing and feeding Highland cows at the Woolen Mill in Callendar was very popular - I think the farm shop near Luss are thinking of providing a similar opportunity. There are many spots that I have found that tourists miss. Having also studied both the ancient and modern day history of the area, given modern technologies, I think there is room for improvement. The ancient church of St. Fillan, the patron saint of mental health (near Crainlarich) is nothing more than a ruin. If marketed properly, it could highlight the healing properties of Loch Lomond and nature. Also, cafes staying open a little later in summer, meals for pensioners and more involvement from creative artists e.g. seanachies or storytellers entertaining and educating the public.
In recent years many of the visitor contact points throughout the park have been closed and changed in some cases to retail and catering of dubious quality. Many years work and significant public investment has been lost. There needs to be an assessment of the impact of the closure of centres at the Rob Roy Centre, Breadalbane, Luss, Lomond Shores etc on the quality of visitor experience and jobs.

I hope that the NP will place a high priority on improving broadband speed and coverage. Also Mobile phone coverage. Both of these are vital for both business and tourism. Public transport also is a big issue.
Having read the above document I find it clearly sets out many issues which should if implemented result in comprehensive improvements to many aspects within the Park boundaries; it is a matter for speculation how many similar improvements there would be within the area without the very heavy control and regulation which the Park authority asserts. I do however feel sure that the document could be greatly reduced in size without loss of relevant content. It could be considered a lesson in obfuscation. There is repetition which makes for tedious reading and a plethora of pictures of happy smiling people and many views of the the area in which we live; we really don’t need this when trying hard to extract the substance from the document.

There is one point which I wish to make and feel that the following anecdote might poignantly illustrated my fear of over-control on the part of the Park authority.

When my children were young, in the eighties, we would regularly meet family and friends at a bay on the east side of Loch Lomond not far down the road from Rowardennan. There would often be other groups there but there was room for all and car parking, adjacent to the beach, was never a problem. We would typically have a carefully controlled barbecue, the kids would swim, we would use our Redcrest dinghy and sail model boats. In every respect except for the midges the circumstances were idyllic.

A couple of years ago I drove up to Rowardennan with my wife late on a week-day afternoon outwith summer months, hoping to see the bay where such happy times from the past were pleasantly imprinted on our memories. It was hard to believe that signs indicated that there was to be no stopping (the car) and although lay-bys were still in existence, signs at each end of these inlets reinforced what we might have forgotten from several miles back, namely ‘no stopping’. To enforce this Draconian bye-law, a doublecrewed vehicle patrolled endlessly the length of the road presumably provided with some form of fixed penalty ticket for those who failed to adhere to the regulation.

As a retired police officer, 25 years of my service as a supervisor (the significance being that I had responsibility for deploying resources) I found this to be a quite appalling use of resources. To spend public finds, from whatever source, to enforce this overbearing and at the same time trivial bye-law, is quite sickening when one considers that police budgets preclude the attendance of police officers for all but relatively serious circumstances. Stopping on an otherwise empty country road does not fall into this category. It is ironic that there is a fair chance that the officers crewing the patrol van would be retired police officers. I hope this anecdote illustrates my well founded
concern that in a number of areas within your consultation document might quite possibly be circumstances where those members of the public involved might find themselves subject to overbearing over-control, subject necessarily to the individuals’ personal circumstances.

Finally, as a disabled person unable to walk more than 50 meters, how can I ever again see my precious bay without incurring some sort of penalty for breach of your authority's regulations?
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions

Customer Reference: 00168
Customer Name: A Peebles
Comment Reference: LDP01/MIR/CONS/00168/1/012

Verbatim Comment:
P13 "85% of visitors to the Park travel by car"

So you've acknowledge this but you haven't done anything about it regarding improving road access and parking. Why not?

You are aware of "limited public transport" but again have done little to address this.

Why hasn't the Nat Park dealt with sustainable transport and co ordination of transport services before now?

Ref directing new development primarily to existing settlement ONLY if required/feasible and there is the road/parking and sewage and electricity and broadband to support it

P15 Historic Build Env. How do you plan to ensure high quality restoration of historic buildings?

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Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions

Customer Reference: 00202
Customer Name: Robert Nugent
Comment Reference: LDP01/MIR/CONS/00202/1/001
Comment Method: EMAIL
Customer Type: Individual Resident

Verbatim Comment:
I heard on the News that we can put ideas for future of the area this is open until Monday.

Pity I did not hear about this until tonight was this advertised our what I holiday every summer in Balloch and have done so for the past 15 years.

This is a long time coming.
This response will focus on the need to provide a continuous pavement for safe walking for the approximately two miles between the Ardlui Hotel and the Drovers Inn at Inverarnan. At the present time there is only an opportunity for safe, walking along a (very rough) form of ‘pavement’ for about one quarter of this distance northward from the Ardlui Hotel, on the west side of the A82 road to the former church building - now converted into a form of residence. For the remainder of the distance northwards, to the Drovers Inn, walking along the narrow A82 road is a potentially dangerous and unsafe and uncomfortable experience particularly for those family groups with younger children. As the edges of this road is bounded for Long sections of this road are bounded on both sides with low earth mounds which made it difficult to move off the road even a short distance to avoid very close contact with passing, or oncoming vehicles.

Whist I am aware of the current similar lack of any safe pavement walking facility for the nearly 8 miles of the A82 northward from its junction with the A83 road at the Tarbet By Hotel and Ardlui Train Station/Ardlui Hotel I feel there is a different and particular need for a continuous pavement between the Ardlui Hotel and Restaurant Complex (including Marina, Holiday Home, Caravan/ Camping Site Water Sports Facility with its nearby Loch Lomond Outdoor Leisure and Conference centre Camp and leisure / recreational and accommodation facilities offered at Inverarnan with the Drovers Inn and nearby Beinglas Farm Campsite and Accommodation Complex.

Particular circumstances relevant to the case for completing a continuous footpath along the A82 between Ardlui and Inveraranan:
(a) There is a seasonal passenger ferry services (mid-Spring to mid-Autumn) operated by the proprietor of Ardlui Hotel across the across the narrow width of Loch Lomond to Ardleish on its eastern shoreline.
(b) Ardleish is sited directly on the West Highland Way long distance footpath and within about one hour’s walking distance northward to the Beinglas Farm Campsite and Accommodation Complex with its restaurant and bar facilities.
(c) The Beinglas Farm site is already linked by a safe ‘on site’ road to the A82 road which thereafter offers a safe pavement link southwards to the very popular Drovers Inn.
Main Issues Report Our Live Park Comments Received

with its overnight accommodation/meals and refreshment facility (around one-quarter mile distance).

Taken together (a) + (b) + (c) could and should offer a very pleasant and varied 'circular tour' experience for walkers and hikers possibly taking around 3-4 hours allowing time for rest and relaxation at the intermediate places en route. But very regrettably for most people, this opportunity is substantially denied by knowledge of the dangerous 1.5 miles of 'missing pavement link' along the A82 road from slightly north of the Ardlui Hotel to Inverarnan.

As the owner of a residential caravan at the Ardlui Holiday Home Park since 1999, I can personally confirm significant numbers of visitors/tourists, either residing at the Ardlui Hotel or its rental lodges/campsite residents or day visitors arriving by car or the Ardlui Train station, inquiring if they can take the passenger ferry crossing of Loch Lomond - experience a walk along the West Highland Way to the Beinglas site - carry on to the Drovers Hotel restaurant/bar and returning to their Ardlui departure points (which could include Ardlui Train Station for return travel south to Glasgow / north to Crianlarich or locations beyond).

Disappointingly such inquirers have had to be advised /warned by myself, and other Ardlui Hotel staff, and doubtless staff of the nearby Loch Lomond Outdoor Centre, of this 1.5 miles of ‘missing link’ pavement section link alongside the A82 road southwards from the Drovers Inn at Inverarnan which is highly unsuitable for safe walking.

Regrettably all the 'alternative' options to walking between Inverarnan/Drovers Inn to Ardlui are all highly unsatisfactory for the following reasons:

* The linking bus service between those locations is rather inflexible given an infrequent service, sometimes full on arrival at Inveruglas.

* Making a prior arrangement to get a lift by car back to Ardlui from family / friends is not necessarily easy or possible.

* Taxi hire can be a prohibitively expensive outlay for many people.

The persistence existence of this 'missing link' significantly discourages many potential walkers/ hikers and those with family groups (particularly with younger children) from participating in what should otherwise be a desirable part of a healthy, recreational, and sustainable activity.

Visitors are not encouraged to stay in this part of the Loch Lomond National Park for as long as they might otherwise want to do.

Denial of such a 'visitor opportunity' to undertake this logical and potentially interesting/invigorating 'circular' tour walking experience Ardlui - Ardleish - Beinglas - Inverarnan - Ardlui (or in the reverse direction) also has a negative impact on what should be a mutually beneficial commercial opportunity eg meals and refreshment potentially beneficial to the all the proprietors at Ardlui, Beinglas and the Drovers establishments.

A particular aspect of such ‘frustration of opportunity' also extends to those residing at Inverarnan who would otherwise desire to travel from the Drovers Inn to the Ardlui Hotel on the occasions when evening entertainment is provided (or in the reverse direction for Ardlui residents when entertainment provided in the Drovers Inn). Whilst car driving might be an option on the outward journey, in either situation, consumption of alcohol is an major deterrent to car driving on the return trip. So too is

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walking given the unsafe nature of the A82 road - particularly during times of darkness.

Lack of a potentially safe walking opportunity safe walking opportunity along the A82 road (even taking only around half an hour) is regrettably 'lose-lose' situation for both the customers and proprietors of both the Ardlui Hotel and the Drovers Inn/Beinglas Camp site.

Although I am aware of the possibility of a continuous pavement facility possibly (sic) being provided as an integral part of the post Pulpit Rock and Crianlarich By-Pass upgrading of the A82 road there is no immediate timescale programmed for such work.

I would respectfully ask that the Loch Lomond National Park Plan makes some very specific reference to the inherent desirability of completing this relatively short 'missing link' which currently frustrates and discourages an enjoyable healthy walking and sustainable form of transport/recreational activity. It is perfectly possible to achieve such a northwards extension of the existing 'pavement' section onwards to Inverarnan in the short term, and which would be compatible with any future upgrading of the A82 road.

The legitimacy for such a request would seem relevant to your criteria applied to 'Options and Solutions' relevant to infrastructure investment which can satisfy the would:

* Improve or extend existing facilities

* They are part of a sustainable local transport solution (to local problems currently being experienced)

As outlined on Page 52 of the Main Issues report.

The 'Opportunity Case' or case for such an improvement in walking alongside the A82 road between Ardlui and Inverarnan is aimed at achieving better linked walking (and cycling) . 'to enable more opportunities for short-breaks between different locations in the Park' and would seem to have a similar legitimacy as is currently being applied to such sustainable improvements between Arrochar and Tarbet along the A83 (as identified in the Main Issues Report, Page 47)

I trust the above observations and comments have been of some constructive contribution to your current Loch Lomond National Park Consultation.
Housing is a key issue for the park. There needs to be an adequate supply of housing to meet local needs, people working in the park, and new households formed by people who have grown up in the park and wish to stay. Much of this modest additional development has to be affordable housing because the proximity of the park to major city and town employment centres has taken existing and new house prices beyond the reach of people in real need. Callander apart, no real case has been made for open market housing other than using it to cross-subsidise affordable housing. Such an approach could be very damaging for settlements in the park that are in commuter distance Glasgow and other major centres of employment.

SCNP’s understanding is that the current local plan has set a target of 75 new houses per annum. In the event, consent has been granted for 48 and on average only 23 new homes have been completed each year. We consider the idea of open market housing cross subsidising affordable housing when there is no need for open market housing in the commuter areas of the park, to be flawed. It is, moreover, apparent from the past experience mentioned above that based on the figures available, it will not work.

We note however, that the Scottish Government has committed (government announcement 24/6/2014) £800,000 to a housing association in the Scottish Borders area and by March 2016 will have committed a total of £12M in the Borders towards the cost of 250 additional affordable homes. LL&TT’s case for priority for affordable homes is as great as that of the Scottish Borders and further pressures need to be applied to government to recognise that need.
Rural Economy Question 1: Should we provide greater support for a broadening of economic activity by providing greater flexibility for new business development in the countryside?

Customer Reference: 00040
Customer Name: Joe Twaddle
Comment Reference: LDP01/MIR/CONS/00040/1/009

Verbatim Comment:
The apprenticeship initiative should continue and be expanded. Sustainable communities are now in danger because of the imbalance of tourists demands/residents way of life.
Rural Economy Question 1: Should we provide greater support for a broadening of economic activity by providing greater flexibility for new business development in the countryside?

Verbatim Comment:
No, absolutely not. Your job is to conserve and enhance, not to provide financial gain for those who seek only money and have no care for the local area. You work for the public sector, by definition you are paid to work on behalf of the public, it is the public's interests you are here to serve, not developers and money grabbers.
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Rural Economy Question 1: Should we provide greater support for a broadening of economic activity by providing greater flexibility for new business development in the countryside?

Customer Reference: 00093
Customer Name: (If applicable) Scottish Natural Heritage
Comment Reference: LDP01/MIR/CONS/00093/1/003
Comment Method: OLDP
Customer Type: Public Body

Verbatim Comment:
RE: Q1: should we provide greater support for a broadening of economic activity by providing greater flexibility for new business development in the countryside?

Yes, but we don’t agree that this flexibility is appropriate in all areas of the Park due to possible impacts on nature and landscape sensitivities. The Plan should set out specific areas where the more flexible policies might apply.
Rural Economy Question 1: Should we provide greater support for a broadening of economic activity by providing greater flexibility for new business development in the countryside?

No, we should not provide greater support for a broadening of economic activity by providing greater flexibility for new business development in the countryside. I believe this would negate the whole purpose of being a national park. A national park is a place where the natural and landscaped (through farming and forestry) environment is protected both for its own sake and to provide somewhere where people who are not fortunate enough to live here can visit and enjoy - away from non-rural economic activity.

I support the retention of existing policy, ie that any new economic development should only be allowed if it supports the retention of existing rurally-based activity. The main issues report itself states that the Local Plan currently has a supportive policy for diversifying rural businesses to achieve this and as identified Rural Activity Area sites. This seems an entirely appropriate proactive approach and I can see that it may be disappointing that current strategy has not borne much fruit to date. However the answer is not to allow potential businesses the right to dictate what and where they can operate.
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Rural Economy Question 1: Should we provide greater support for a broadening of economic activity by providing greater flexibility for new business development in the countryside?

Customer Reference: 00108
Customer Name: Susan Calder
Comment Reference: LDP01/MIR/CONS/00108/1/001
Comment Method: OLDP
Organisation: (If applicable)

Verbatim Comment:
Concerned about the phrase 'greater flexibility' and what this might allow. Prefer current policy where developments have to relate to the retention of an existing rural based economic activity. This is in keeping with the Park's first aim to conserve and enhance the natural beauty and cultural heritage of the area.

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Rural Economy Question 1: Should we provide greater support for a broadening of economic activity by providing greater flexibility for new business development in the countryside?

Customer Reference: 00113
Customer Name: Luss Estates Company
Comment Reference: LDP01/MIR/CONS/00113/1/006
Comment Method: OLDP
Organisation: Luss Estates Company (If applicable)

Customer Type: Individual Resident

Verbatim Comment:
Yes - Luss Estates agree that greater support should be provided for a broadening of economic activity. Please do not forget the great importance of facilitating the provision of fast broadband with
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Rural Economy Question 1: Should we provide greater support for a broadening of economic activity by providing greater flexibility for new business development in the countryside?

Customer Reference: 00115
Customer Name: Anne-Michelle Ketteridge
Comment Reference: LDP01/MIR/CONS/00115/1/003
Comment Method: OLDP
Customer Type: Individual Resident

Verbatim Comment:
Given that the majority of businesses (by number) are tourism businesses, or rely on tourism, it is important that business/industrial developments are not encouraged that might be detrimental to tourism - particularly the landscape and environmental appeal of the area.
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<td>Customer Type:</td>
<td>Individual Resident</td>
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**Verbatim Comment:**

It is unclear what flexibility will lead to. It is all very well encouraging business in the area but there aren't the houses for people to live in to conduct new businesses and the NP appears to be against allowing non Affordable housing being built.
4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.1

Rural Economy Question 1: Should we provide greater support for a broadening of economic activity by providing greater flexibility for new business development in the countryside?

Customer Reference: 00169  
Customer Name: David Morris  
Comment Reference: LDP01/MIR/CONS/00169/1/001  
Comment Method: OLDP  
Customer Type: Individual Resident

Verbatim Comment:
The provision of greater flexibility for new business development in the countryside seems sound as a high level concept. However, the MIR does not provide an adequate insight for stakeholders to understand what this might lead to. For example, if this would foster the provision of even more tourist accommodation then this should not be encouraged. I would believe that the pendulum has already swung too far in favour of tourist provision at the expense of the Park’s first aim to "Conserve and enhance the natural and cultural heritage of the area". However greater support should be provided for small "start up" businesses that collectively could make a significant contribution to a rural economy. Many of these potential businesses are "clean" in that they tend not to have an adverse affect on the environment and amenity of an area. I would suggest that one of your major initiatives should be the provision of effective broadband Internet access to the Drymen area. From our experience, the current service level is so poor that it represents a significant barrier to business development.
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Verbatim Comment:
Greater (potential) flexibility should be offered for rural business.
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Rural Economy main issue - This main issue identifies the need for a diverse rural economy within the National Park. We welcome the reference to the existing policy (ED3) and the explanation provided in relation to the change needed to the policy to increase its flexibility. Rural Economy Question 1 - Policy on rural development should comply with the section on Promoting Rural Development in SPP 2014, which outlines three rural areas with a differing policy approach in each: - Pressurised; - Intermediate; - Remote and fragile.

All three categories potentially apply within the National Park and it is important that the NPA’s approach to rural development is reflective of the policy approach outlined in SPP 2014. It is key to note that SPP 2014 promotes an overarching aim of supporting diversification and growth of the rural economy. Overall, we consider that greater support for a broadening of economic activity in the National Park would be in accordance with the policy set out in SPP 2014 subject to the detailed policy prescriptions outlined within the three distinct rural areas.

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Rural Economy

Question: has the farming acreage been lowered and has the quality of acreage changed. Is there a correlation between land yield and population decline? Land quality is decreased by lack of fertilizer, drainage, crop rotation and increased vermin. Are these being effectively measured? Are the subsidies for "doing nothing" harming the root of the rural economy and forcing economic decline. Note the number of fields that are now unmaintained is increasing.

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Rural Economy Question 1: Should we provide greater support for a broadening of economic activity by providing greater flexibility for new business development in the countryside?

No or only in very limited amounts. Careful consideration should be made as to the type of economic activity and with the primary aim of the Park to 'Conserve and enhance the natural and cultural heritage of the area' always being given overriding precedence.
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<td>Rural Economy Question 1:</td>
<td>Should we provide greater support for a broadening of economic activity by providing greater flexibility for new business development in the countryside?</td>
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<td>Customer Reference:</td>
<td>00143</td>
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<tr>
<td>Organisation:</td>
<td>Homes for Scotland</td>
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<td>Customer Name:</td>
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<td>Comment Method:</td>
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<td>Customer Type:</td>
<td>Other</td>
</tr>
<tr>
<td>Organisation:</td>
<td>Homes for Scotland</td>
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</tbody>
</table>

Verbatim Comment:
Local businesses point to high rents, little choice of property, little development land, planning and SEPA constraints, and poor infrastructure as constraints on business. They also indicate clearly the areas of strongest demand for business premises and activity, especially around Callander. However, the MIR proposes two pilot areas for development frameworks, neither of which accord with where businesses say they need development. If frameworks are to be tested, then surely they should be in areas where there is the greatest chance of economic development.

The MIR acknowledges the potential of building groups as a basis for development and growth, both economic and housing. An approach which allows landowners the opportunity to create value for investment is also recognised as important. Therefore it makes sense to encourage small-scale development in areas where there is value to be created. That suggests that policy ed3 should provide the maximum flexibility for investment in rural business, subject to other policies on design and so on.

Suggestions:

Support the proposed change to ED3 - identify the Callander area as a pilot framework area.
Rural Economy Question 1: Should we provide greater support for a broadening of economic activity by providing greater flexibility for new business development in the countryside?

Verbatim Comment:
Greater flexibility for new business development in principle, sounds like a good idea. However what does this greater flexibility actually entail?

If this means flexibility in terms of supporting business development outwith the usual tourist focus till now then yes this should definitely be encouraged. The emphasis on tourist accommodation has gone too far in my opinion and more flexibility in relation to this is needed.

Lack of a decent level of service speed of broadband in the area is a severe hindrance to business development in general and therefore a higher quality of broadband provision is essential given the rural setting.
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<td>Rural Economy Question 1: Should we provide greater support for a broadening of economic activity by providing greater flexibility for new business development in the countryside?</td>
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<tr>
<td>Customer Reference:</td>
<td>00173</td>
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<tr>
<td>Customer Name:</td>
<td>Isabella Morris</td>
</tr>
<tr>
<td>Comment Reference:</td>
<td>LDP01/MIR/CONS/00173/1/001</td>
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<tr>
<td>Comment Method:</td>
<td>OLDP</td>
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<tr>
<td>Customer Type:</td>
<td>Individual Resident</td>
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Greater flexibility for development as a concept is a laudable idea however the focus should not be on promoting just tourist accommodation. There is too much emphasis on this already. The Park’s first aim to "Conserve and enhance the natural and cultural heritage of the area" should be paramount. Support should be provided for small "start up" businesses that can make a significant contribution to a rural economy. One of the major initiatives should be the provision of effective broadband internet access to the Drymen area. At the moment the level is so poor that it poses a barrier to business development.

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<td>Verbatim Comment:</td>
<td>Rural Economy Question 2: Do you agree that a pilot approach should focus on two key areas in the Park?</td>
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<tr>
<td>Customer Reference:</td>
<td>00088</td>
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<tr>
<td>Customer Name:</td>
<td>Callander Community Council</td>
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<tr>
<td>Comment Reference:</td>
<td>LDP01/MIR/CONS/00088/5/001</td>
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<tr>
<td>Comment Method:</td>
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<td>Customer Type:</td>
<td>Local Public Body</td>
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Yes, apart from the designated sites for rural development framework areas.
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<td>Customer Reference:</td>
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<td>Customer Name:</td>
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<tr>
<td>Organisation:</td>
<td>Scottish Natural Heritage</td>
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<tr>
<td>Comment Reference:</td>
<td>LDP01/MIR/CONS/00093/1/004</td>
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<td>Comment Method:</td>
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<td>Customer Type:</td>
<td>Public Body</td>
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**Rural Economy Question 2: Do you agree that a pilot approach should focus on two key areas in the Park?**

Yes
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.2

Rural Economy Question 2: Do you agree that a pilot approach should focus on two key areas in the Park?

Customer Reference: 00106
Customer Name: Anne Lee

Comment Reference: LDP01/MIR/CONS/00106/1/002
Comment Method: OLDP
Customer Type: Individual Resident

Verbatim Comment:
No, I do not agree with the general principle of the pilot approach of having Rural Development Framework Areas. As stated in my answer to Rural Economy Question 1 the Park already has appropriate proactive policies. The MIR refers to the possibility of varying from park wide policies on housing, tourism or economic development in such Framework areas. The implication of this is that discussions with landowners and other partners would lead to 'quid pro quo' proposals i.e. combining acceptable proposals with proposals that run counter to park principles and policies.

Should the Park decide to go ahead with the principle of setting up pilot areas it would, in my opinion, to be outrageous to include 'the area between Balmaha and Drymen' - although you state that the identification of these areas reflects feedback at the 2013 Charrette events for the Drymen and Buchanan area, in fact this concept was neither mooted nor discussed during the charrette process. It is entirely disingenuous to take a range of statements from these events and turn them into a desire to be part of a development area. Should the park go ahead with the principle (and I hope it will not) there should be a democratic and open process to allow communities and landowners etc to put themselves forward for consideration, alongside any suggestions from the Park and full consultation with local communities.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
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<td>Customer Reference:</td>
<td>00108</td>
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<tr>
<td>Customer Name:</td>
<td>Susan Calder</td>
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<td>Comment Reference:</td>
<td>LDP01/MIR/CONS/00108/1/002</td>
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<tr>
<td>Organisation:</td>
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<td>Comment Method:</td>
<td>OLDP</td>
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<tr>
<td>Customer Type:</td>
<td>Individual Resident</td>
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**Verbatim Comment:**

No I do not agree. I would rather that the Park enhance and conserve what is special about the park.
Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.2

Rural Economy Question 2: Do you agree that a pilot approach should focus on two key areas in the Park?

Customer Reference: 00081
Customer Name: (If applicable)
Comment Reference: LDP01/MIR/CONS/00081/2/001
Comment Method: OLDP
Customer Type: Individual Resident

Verbatim Comment:
I live in Buchanan Castle Estate and know that there is zero demand for any development or economic activity in this estate (outwith relatives or employees of xxxxxxxxxx) so if you do insist on going ahead with your plans would it not be reasonable to exclude the estate from them? The last time a development was discussed in the estate you completely ignored the wishes of the residents and granted permission to xxxxxxxxxx for development, it would be most regrettable if you were to ignore the wishes of the residents again. We are not dependant on tourism for our income like some in the wider area, we live here precisely because it's quiet and want to keep it that way.

Just to reiterate, no-one here wants any development at all, none, so please keep us out of it and do your job properly i.e. serve the residents of the park with an emphasis on conservation, not development.
Luss Estates Company agrees with the preferred Option, and that a pilot should be implemented focusing on two key areas including Luss.

Rural Economy Question 2: Do you agree that a pilot approach should focus on two key areas in the Park?

Anne-Michelle Ketteridge, Individual Resident, comments:

 Whilst it sounds good to be encouraging land managers, communities and public agencies to be working together to develop opportunities, I’m not sure that it needs to be so formal as 'Development Frameworks'. It also sounds a little exclusive to be only encouraging partnership arrangements in just two areas of the Park - could it not be encouraged in all areas that want to go down this partnership approach?
The implementation of a pilot Rural Framework Development Area for the Balmaha to Drymen corridor seems sound as a high level concept. The issue boils down to what detail policies are built into the framework. It would be essential that the local communities participate in the development of such policies. However, the MIR does not provide an adequate insight for stakeholders to understand what this might lead to. If the Rural Framework Development Area emphasised conservation rather than promoting further development then this would be a positive move. You will already be well aware the residents of Buchanan Castle Estate have very strong views on the preservation of the Estate. It should be absolutely understood that Buchanan Castle should remain as a ruin and not developed. If however the Rural Framework Development Area encouraged more development, and especially, at the expense of conservation then I see this as being negative.
The emphasis must be on conservation rather than just development. As a resident of Buchanan Castle Estate I hold very strong views on the preservation of the Estate. Buchanan Castle must remain as a ruin. The Rural Framework should not encourage more development at the expense of conservation. The opinion of the local community must be paramount.

I'm not certain that specifying trial locations has any benefit. It may be possible to concentrate support on these areas as long as it doesn't stifle potential elsewhere in the meantime.
Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.2

Rural Economy Question 2: Do you agree that a pilot approach should focus on two key areas in the Park?

Customer Reference: 00185
Customer Name:
Comment Reference: LDP01/MIR/CONS/00185/1/004
Comment Method: EMAIL
Customer Type: National Government
Organisation: Scottish Government (If applicable)

Verbatim Comment:
Rural Economy Question 2 - Although the principle of this approach may be acceptable, we would require further detail on what is proposed, for example, in terms of varying from park wide policies, before commenting further. We consider that any pilot approach would have to be carefully considered to ensure that the principle of a plan led system is maintained.
Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.2

**Rural Economy Question 2: Do you agree that a pilot approach should focus on two key areas in the Park?**

Customer Reference: 00219  
Organisation: Buchanan Community Council  
(If applicable)  
Customer Name:  
Comment Reference: LDP01/MIR/CONS/00219/1/001  
Comment Method: EMAIL  
Customer Type: Local Public Body  

**Verbatim Comment:**
The proposal for a new planning approach - Rural Development Framework Area - is a welcome initiative. Page 42 highlights the suggested priority headings and we support these - in particular the infrastructure improvements. We look forward to being active partners in the decision making process and welcome immediate involvement. We would also welcome a process by which the community views can be seen to be effective in influencing any decisions made. The Charrette findings were disappointing for us as a whole but if this new process is a result from that there has been a positive outcome. We look forward to the start of this collaboration and would like any details of initial proposals that you have identified.
Main Issues Report Our Live Park Comments Received

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Rural Economy Question 2: Do you agree that a pilot approach should focus on two key areas in the Park?

Customer Reference: 00088
Customer Name: Callander Community Council
Comment Reference: LDP01/MIR/CONS/00088/2/002
Comment Method: OLDP
Customer Type: Local Public Body

Verbatim Comment:
We do not agree that the pilot is restricted to Drymen and Luss, both on the Loch Lomond side of the Park. We agree that this type of initiative is needed but it should be applied to all communities throughout the Park.

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.2

Rural Economy Question 2: Do you agree that a pilot approach should focus on two key areas in the Park?

Customer Reference: 00105
Customer Name: David Lee
Comment Reference: LDP01/MIR/CONS/00105/1/002
Comment Method: OLDP
Customer Type: Individual Resident

Verbatim Comment:
No. The two chosen areas are both prime tourist and residential areas. The risk is high of spoiling the most well known and loved areas around Loch Lomond with experiments that cannot be undone. There is also the risk that increased building and economic development will breed more of the same. Why has the focus shifted from enhance and conserve to develop at all costs?

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.2

Rural Economy Question 2: Do you agree that a pilot approach should focus on two key areas in the Park?

Customer Reference: 00128
Customer Name: Christopher Mosley
Comment Reference: LDP01/MIR/CONS/00128/1/001
Comment Method: FORM
Customer Type: Individual Resident

Verbatim Comment:
Buchanan Castle residents were not included in the consultation arranged by the park on this subject.

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Rural Economy Question 2: Do you agree that a pilot approach should focus on two key areas in the Park?

Customer Reference: 00138
Customer Name: Iain Bruce
Comment Reference: LDP01/MIR/CONS/00138/1/001
Comment Method: FORM
Customer Type: Individual Resident

Verbatim Comment:
I am opposed in principal to "greater flexibility" particularly having regard to the ethos of a "National Park" to retain the natural heritage. Current Planning Regulations provide for all forms of development and the necessary protection of the environment and individuals. Allied to this I see no need for "Rural Framework Development Areas" which will have the effect to encourage development in the Park to which my previous comments equally apply. If notwithstanding my comments these proposals proceed I would strenuously oppose any such application affecting Buchanan Castle Estate and I would therefore hope that "Alternative Option 2" prevails.
Rural Economy Question 2: Do you agree that a pilot approach should focus on two key areas in the Park?

Verbatim Comment:
I am not in agreement with making Balmaha part of a Pilot Scheme. I have serious concerns about Balmaha becoming part of a Pilot scheme to promote more development on the grounds that I do not consider that the Nat Park has looked after this area well over the last 5 years choosing to promote tourism accommodation over private accommodation and failing to provide proper infrastructure in terms of roads/public transport/car parking/signage/activities in the area. Whilst I appreciate some of these are in the control of Stirling Council there is no evidence that the NP and SC are working together to resolve any of the problems which have been outstanding for years.

Will putting a pilot scheme in place just enable the Nat Park to manipulate the rules to ensure they get what they want without any recourse to the realities of the local situation?
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<td>Customer Reference:</td>
<td>00172</td>
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<tr>
<td>Customer Name:</td>
<td>Greig Morris</td>
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<tr>
<td>Comment Reference:</td>
<td>LDP01/MIR/CONS/00172/1/002</td>
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<td>Organisation:</td>
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**Rural Economy Question 2: Do you agree that a pilot approach should focus on two key areas in the Park?**

Verbatim Comment:

A pilot scheme sounds like an interesting and valuable idea but this is dependent again on what this actually entails. If this means closer integration on decision making between the residents of the Balmaha to Drymen corridor and the National Park then yes this should be encouraged.

If the Rural Framework Development Area places an emphasis on conservation of this corridor rather than development then I would be firmly in favour of the pilot scheme. However if this is instead a way of pushing through development such as for example Buchanan Castle, I would be firmly against such an approach. Buchanan Castle is a ruin and should remain as this, an issue that the local residents feel very strongly on.
### Rural Economy Question 3: Do you agree that closer links with Land and Visitor Management would be beneficial?

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<td>Customer Reference:</td>
<td>00093</td>
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<td>Customer Name:</td>
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<tr>
<td>Comment Reference:</td>
<td>LDP01/MIR/CONS/00093/1/005</td>
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<tr>
<td>Verbatim Comment:</td>
<td>Yes, although this could be broadened to include small scale rural diversification.</td>
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<td>Customer Reference:</td>
<td>00106</td>
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<tr>
<td>Customer Name:</td>
<td>Anne Lee</td>
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<tr>
<td>Comment Reference:</td>
<td>LDP01/MIR/CONS/00106/1/003</td>
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<tr>
<td>Verbatim Comment:</td>
<td>It is impossible to answer this question directly as it is not clear what the context is. If the aim is to promote closer dialogue amongst local communities and local landowners and businesses I think it would be a good idea - perhaps already existing forums could be improved. If it is being put forward as part of implementing the idea of the Rural Framework plot then I would be opposed.</td>
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## Rural Economy Question 3: Do you agree that closer links with Land and Visitor Management would be beneficial?

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<tr>
<td>Customer Name:</td>
<td>Susan Calder</td>
<td>Comment Method:</td>
<td>OLDP</td>
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<td>Comment Reference:</td>
<td>LDP01/MIR/CONS/00108/1/003</td>
<td>Customer Type:</td>
<td>Individual Resident</td>
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Verbatim Comment:
No I do not agree. Closer links with who?

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<th>Organisation:</th>
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<td>Comment Method:</td>
<td>OLDP</td>
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<tr>
<td>Comment Reference:</td>
<td>LDP01/MIR/CONS/00081/3/001</td>
<td>Customer Type:</td>
<td>Individual Resident</td>
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Verbatim Comment:
Only if you do what we want you to do and stop placing the wishes of developers before the residents you are supposed to work on behalf of. Any developer should be treated with great suspicion and stopped in their tracks if at all possible unless the local populace expressly want them to be allowed to proceed. Developers are interested only in profit, they couldn't care less about the local area but you are supposed to, it's what you get paid for, by us. So, if it's greater links with residents, yes, if it's with developers, no.
Main Issues Report Our Live Park Comments Received

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Rural Economy Question 3: Do you agree that closer links with Land and Visitor Management would be beneficial?

Customer Reference: 00113
Customer Name: Luss Estates Company
Comment Reference: LDP01/MIR/CONS/00113/1/008
Comment Method: OLDP
Organisation: Luss Estates Company
Comment Reference: 00113
Organisation: Luss Estates Company
Customer Type: Private Business

Verbatim Comment:
Yes - Luss Estate agrees with this point.

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.3

Rural Economy Question 3: Do you agree that closer links with Land and Visitor Management would be beneficial?

Customer Reference: 00115
Customer Name: Anne-Michelle Ketteridge
Comment Reference: LDP01/MIR/CONS/00115/1/002
Comment Method: OLDP
Organisation: (If applicable)
Customer Type: Individual Resident

Verbatim Comment:
Yes, assuming that communities are also key parts of that partnership too.
Rural Economy Question 3: Do you agree that closer links with Land and Visitor Management would be beneficial?

Verbatim Comment:
I do not agree with there being closer links with Land and Visitor Management. However I would agree that closer links between communities and Land and Visitor Management might be beneficial providing the Communities contribution was given proper consideration.

Customer Name: A
Customer Reference: 00168
Comment Reference: LDP01/MIR/CONS/00168/1/003
Comment Method: OLDP
Customer Type: Individual Resident
Organisation: (If applicable)

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Rural Economy Question 3: Do you agree that closer links with Land and Visitor Management would be beneficial?

Verbatim Comment:
I don’t understand the question. It does not make sense. You do not state whom the "closer links" are between. The over riding principle here must be that local communities must determine what happens in their own patch. This seems to be in line with the Scottish Parliament’s Community Empowerment Bill.

Customer Name: David Morris
Customer Reference: 00169
Comment Reference: LDP01/MIR/CONS/00169/1/003
Comment Method: OLDP
Customer Type: Individual Resident
Organisation: (If applicable)
Rural Economy Question 3: Do you agree that closer links with Land and Visitor Management would be beneficial?

Verbatim Comment:
A very ambiguous and misleading question. Local communities must determine what happens in their own area - the Scottish Parliament’s Community Empowerment Bill.

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.3

Customer Reference: 00173
Customer Name: Isabella Morris
Comment Reference: LDP01/MIR/CONS/00173/1/003
Comment Method: OLDP
Customer Type: Individual Resident

Verbatim Comment:
Yes, land and visitor management must be linked at least in order to avoid conflicts and where possible achieve win-win benefits.
4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.3

Rural Economy Question 3: Do you agree that closer links with Land and Visitor Management would be beneficial?

Customer Reference: 00185
Customer Name: Scottish Government
Comment Reference: LDP01/MIR/CONS/00185/1/005
Comment Method: EMAIL
Customer Type: National Government

Verbatim Comment:
Rural Economy Question 3 - Although this approach may be beneficial, we would seek clarity on policy ED3 (b) and whether development in accordance with an agreed Estate Management Plan is required for all development or whether development is just to be promoted where such a management plan exists. We would have concerns if all development had to be in accordance with an Estate Management Plan. In this respect we refer to the plan led system and the LDP being the primary document for the consideration of development proposals.

Customer Reference: 00088
Customer Name: Callander Community Council
Comment Reference: LDP01/MIR/CONS/00088/2/003
Comment Method: OLDP
Customer Type: Local Public Body

Verbatim Comment:
Yes, this is fundamental to the National Park.
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.3

Rural Economy Question 3: Do you agree that closer links with Land and Visitor Management would be beneficial?

Customer Reference: 00105
Customer Name: David Lee
Comment Reference: LDP01/MIR/CONS/00105/1/003
Comment Method: OLDP

Verbatim Comment:
No. This implies that the Park intends to give preference to major landowners as opposed to the communities that live and work in the park.

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.3

Rural Economy Question 3: Do you agree that closer links with Land and Visitor Management would be beneficial?

Customer Reference: 00172
Customer Name: Greig Morris
Comment Reference: LDP01/MIR/CONS/00172/1/003
Comment Method: OLDP

Verbatim Comment:
I do not understand what closer links with Land and Visitor Management actually means. Who are the closer links between? If this is closer links between the National Park and the local residents of the area then yes there should be closer links. Decision making should always come back to the opinion of the local community rather than what the National Park believes to be in the best interests of the local community. Local communities need to be able to determine decisions in their own area.
4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.4

Options and Solutions for Rural Economy: What option do you prefer? Why?

Customer Reference: 00092
Customer Name:
Comment Reference: LDP01/MIR/CONS/00092/1/001
Comment Method: OLDP
Customer Type: Local Government

The preferred option of allowing greater flexibility for economic development within the countryside is supported by this Council, as long as the requirement for development not to have a detrimental impact on the special qualities of the Park is maintained. The current requirement for economic development to be associated with existing activity seems unnecessarily restrictive when there is a continuing need for diversification of the rural economy. Further, there is no need to restrict development to within groups of buildings when the safeguard of protecting the special qualities of the Park is in place.

The Main Issues Report does not make clear what form or format the Rural Development Frameworks for Luss and Drymen/Balmaha will take, but does suggest that they will provide more clarity for landowners and communities on what is acceptable in planning terms. Whilst recognising resource restrictions, it would be a concern if that part of the National Park within West Dunbartonshire was put at a disadvantage - both in terms of protecting the environment and attracting economic investment - by not having a Rural Development Framework in place.
<table>
<thead>
<tr>
<th>Chapter Commented on:</th>
<th>4 Identifying the Main Issues - what needs major change and what are the options? &gt;&gt; 4.3 Main issues, potential options and solutions &gt;&gt; 4.3.4</th>
</tr>
</thead>
<tbody>
<tr>
<td>Customer Reference:</td>
<td>00093</td>
</tr>
<tr>
<td>Organisation:</td>
<td>Scottish Natural Heritage</td>
</tr>
<tr>
<td>Customer Name:</td>
<td>(If applicable)</td>
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<tr>
<td>Comment Reference:</td>
<td>LDP01/MIR/CONS/00093/1/006</td>
</tr>
<tr>
<td>Comment Method:</td>
<td>OLDP</td>
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<tr>
<td>Customer Type:</td>
<td>Public Body</td>
</tr>
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</table>

**Options and Solutions for Rural Economy: What option do you prefer? Why?**

Option 1. This provides more flexibility than the current policy. However, our support for this approach is contingent on a robust policy that requires that Estate Management Plans (or at least some key elements of the plan) are capable of being enforced/delivered. It should not be possible to approve development proposals that may have a negative impact on landscape/nature on the basis of an Estate Plan (which may include good management that delivers enhancement to landscape/nature that compensates for impacts) that is then only partially delivered.
I strongly prefer Option 2, ie to keep the current Local Plan approach. My reasons for this are those stated in answer to Rural Economy Questions 1 -3, in summary that I want to see the Park continuing to promote the first and overriding principle that in a national park greater weight must always be given to the conservation and enhancement of the natural and cultural heritage.
I prefer Alternative Option 2, to RETAIN CURRENT LOCAL PLAN APPROACH.

I support option 2, to retain the current local plan approach. I pick this option as the best of a bad bunch as even option 2 isn't great in that it doesn't prevent you from riding roughshod over the wishes of local people again. I have no interest in what the people of Balmaha or Luss wish to do and should therefore not have a say in the matter, equally, they should have no say in Buchanan Castle Estate. Quite frankly, ideally the national park would have no say either. All we want is to be left alone, we don't need or desire economic development, we just want peace and quiet.
### Options and Solutions for Rural Economy: What option do you prefer? Why?

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<thead>
<tr>
<th>Chapter Commented on</th>
<th>Verbatim Comment</th>
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</thead>
<tbody>
<tr>
<td>4.3 Main issues, potential options and solutions &gt;&gt; 4.3.4</td>
<td>Luss Estate prefers the proposed ED3 policy. Luss Estate is happy to work with the Park to this end, but would not accept the notion that as a business independent of the Park we would need to plan our business in conjunction with / the approval of the Park via an agreed Estate Management Plan.</td>
</tr>
</tbody>
</table>
Options and Solutions for Rural Economy: What option do you prefer? Why?

Subject to the comments below, I would prefer Alternative Option 2- (ie Retain current local plan approach). With some notable exceptions, this approach has served well over the last 10 years. I am concerned that both your Preferred Option & Alternative Option 1 are too undefined at this stage to allow positive support. The only way that the Rural Development Framework Area concept can be supported is if the communities directly participate in the drafting of the local Framework and agree to its final version. I would express a note of caution with regard to the concept of enabling development. While this has some logical attraction, at a practical level, it can be fraught with difficulty. It is quite possible for a developer to build the enabling element of their project and not be in the position (deliberately or accidentally) to complete the remaining element that required cross funding. I would suggest that it would be impossible for the Park to safeguard against this situation. The only foolproof approach would have to be for the developer to place funds in an escrow account prior to the project start. However, I would suspect that a developer would be unable or unwilling to agree to this constraint.
<table>
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<tbody>
<tr>
<td><strong>Options and Solutions for Rural Economy: What option do you prefer? Why?</strong></td>
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<tr>
<td><strong>Customer Reference:</strong></td>
<td>00173</td>
</tr>
<tr>
<td><strong>Customer Name:</strong></td>
<td>Isabella Morris</td>
</tr>
<tr>
<td><strong>Comment Reference:</strong></td>
<td>LDP01/MIR/CONS/00173/1/004</td>
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<tr>
<td><strong>Organisation:</strong></td>
<td>(If applicable)</td>
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<td><strong>Comment Method:</strong></td>
<td>OLDP</td>
</tr>
<tr>
<td><strong>Customer Type:</strong></td>
<td>Individual Resident</td>
</tr>
</tbody>
</table>

**Verbatim Comment:**
I prefer "Alternative Option 2" (ie Retain current local plan approach) as this has worked over the last 10 years. Your Preferred Option & Alternative Option 1 is too vague at this stage. The Rural Development Framework Area concept can only be supported if the communities directly participate in the drafting of the local Framework and agree to its final version. Enabling development can be risky and could leave communities exposed to developers who do not fulfil their promises.
4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.4

Options and Solutions for Rural Economy: What option do you prefer? Why?

The Council has no specific comments on the proposed Rural Development Framework Areas (RDFA) and would welcome further consultation at a more detailed stage. There is however some confusion over the geographical limits to which the proposed amendment to policy ED3 applies. It is assumed this is across the whole Park area rather than just the RDFA. The proposed amendment of policy ED3 to remove the requirement for new economic development to relate to the retention of an existing rural based economic activity is generally supported. The approach is similar to Stirling’s proposed LDP approach in policy 2.9 which supports appropriate economic development in the countryside. However, there is some concern that there is no requirement for a sequential approach with preference given to existing development, existing settlements/ building group or greater preference for the use of existing buildings. Alternative Option 1 would also be acceptable, although this may be overly restrictive. Perhaps a policy which seeks to support new development but places a greater emphasis on the sustainable location and re-use of buildings would be preferable.
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<td>Comment Reference:</td>
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<td>EMAIL</td>
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<td>Customer Type:</td>
<td>Public Body</td>
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<tr>
<td>Organisation:</td>
<td>Transport Scotland</td>
</tr>
<tr>
<td>Verbatim Comment:</td>
<td>Main Issues, Potential Options and Solutions - Transport Scotland is keen to continue the positive discussions with the Park, in particular on; Rural Economy: We generally support the Preferred Option to identify two areas of the Park as Rural Development Framework Areas. Early consultation on the approach to the policy within the plan and the suggested supplementary guidance would be welcomed. Any mitigation resulting from an increased use in the Trunk Road junctions due to development generated traffic will require to be developer financed.</td>
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<td>Comment Reference:</td>
<td>LDP01/MIR/CONS/00088/2/004</td>
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<td>Comment Method:</td>
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<tr>
<td>Customer Type:</td>
<td>Local Public Organisation</td>
</tr>
<tr>
<td>Organisation:</td>
<td>Callander Community Council</td>
</tr>
<tr>
<td>Verbatim Comment:</td>
<td>We support the redevelopment of clusters of buildings and a flexible approach to supporting existing rural businesses.</td>
</tr>
<tr>
<td>Chapter Commented on:</td>
<td>4 Identifying the Main Issues - what needs major change and what are the options? &gt;&gt; 4.3 Main issues, potential options and solutions &gt;&gt; 4.3.4</td>
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<tr>
<td>Options and Solutions for Rural Economy: What option do you prefer? Why?</td>
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<tr>
<td>Customer Reference:</td>
<td>00105</td>
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<tr>
<td>Customer Name:</td>
<td>David Lee</td>
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<tr>
<td>Comment Reference:</td>
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<td>Comment Method:</td>
<td>OLDP</td>
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<tr>
<td>Customer Type:</td>
<td>Individual Resident</td>
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</table>

Verbatim Comment:

Alternative Option 2 is preferred. The current Local Plan retains respect for the aims of maintaining the Park with an allowance for limited development. It is after all a National Park not an outlying part of the city where massed housing and industrial development makes more sense.

Great care needs to be exercised to ensure that the aims of financially self interested land owners and developers do not have undue influence to the detriment of visitors and residents.
4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.4

**Options and Solutions for Rural Economy: What option do you prefer? Why?**

**Customer Reference:** 00128  
**Customer Name:** Christopher Mosley  
**Comment Reference:** LDP01/MIR/CONS/00128/1/002  
**Comment Method:** FORM  
**Customer Type:** Individual Resident

**Verbatim Comment:**  
I prefer Alternative Option 2

---

4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.4

**Options and Solutions for Rural Economy: What option do you prefer? Why?**

**Customer Reference:** 00150  
**Customer Name:**  
**Comment Reference:** LDP01/MIR/CONS/00150/1/004  
**Comment Method:** EMAIL  
**Customer Type:** Local Government

**Verbatim Comment:**  
General support for the Preferred Option of greater flexibility regarding economic development in the countryside where these are allied to Fural Development Frameworks, recognising that these should detail the level of contribution required from landowners/developers for the provision of services and infrastructure to enable such development.
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.4

Options and Solutions for Rural Economy: What option do you prefer? Why?

Customer Reference: 00168
Customer Name: A Peebles
Comment Reference: LDP01/MIR/CONS/00168/1/004

Verbatim Comment:
Retain CURRENT local Plan so the local community has much more say/control in what happens.

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.4

Options and Solutions for Rural Economy: What option do you prefer? Why?

Customer Reference: 00172
Customer Name: Greig Morris
Comment Reference: LDP01/MIR/CONS/00172/1/004

Verbatim Comment:
Alternative Option 2 is my preference. Generally this has served well since the implementation of the National Park with a few exceptions.

I am firmly against Alternative Option 1.
In relation to the preferred option for the rural economy, we are supportive of all three parts of this approach. In particular, we support the proposal to revise policy ED3. Sportscotland supports the positive approach advocated by SPP paragraph 75 to rural development that supports prosperous and sustainable communities and businesses whilst protecting and enhancing environmental quality. Paragraph 79 states that, "plans should set out a spatial strategy which promotes economic activity and diversification, including, where appropriate, sustainable development linked to tourism and leisure "while ensuring that the distinctive character of the area, the service function of small towns and natural and cultural heritage are protected and enhanced". Outdoor sport and recreation development can make a positive economic contribution and can contribute significantly to diversification. Such development can have specific locational requirements, often linked to the natural resources they are dependent on. Outdoor centres, equestrian facilities, mountain bike centres, canoe changing facilities or a slipway can all, for example, have particular rural and natural heritage locational needs; it is considered that the proposed revision to policy ed3 therefore provides flexibility to allow for such development to come forward, whilst still safeguarding the special qualities of the park environment.
### Visitor Experience Question 1: Do you agree? Are there any other settlements where we should support tourism investment and development?

<table>
<thead>
<tr>
<th>Customer Reference:</th>
<th>00106</th>
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<tbody>
<tr>
<td>Customer Name:</td>
<td>Anne  Lee</td>
</tr>
<tr>
<td>Comment Reference:</td>
<td>LDP01/MIR/CONS/00106/1/005</td>
</tr>
<tr>
<td>Comment Method:</td>
<td>OLDP</td>
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<tr>
<td>Customer Type:</td>
<td>Individual Resident</td>
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</table>

I agree with the that the places you identify are the key locations. I would also agree that there is potential to develop Aberfoyle which is very well situated for tourists to explore various areas of the park. However it is not a very attractive place in itself, suffering from very incoherent and ad hoc development and would need a lot of money spent to make it a more attractive place.
I do not agree with the exclusion of Gartmore from the areas with small scale tourist potential on the map on P16 of the Main Issues Report. Gartmore lies on National Cycle Network Route 7 and has two significant sized camping and caravan sites within the Community Council boundary. It has a Conference and Activity Centre (Gartmore House), several properties offering Bed and Breakfast or self catering accommodation, a country pub with food and accommodation (Black Bull Hotel), a community owned Village Shop and a refurbished Village Hall. There is excellent potential for increasing the economic benefit to these businesses and the village in general by promoting and supporting further tourism.

The National Park could assist in a number of ways. Currently most tourists bypass Gartmore on the A81. There should be brown tourist signs at both ends of the village promoting local services and facilities. Local walks should be signposted and more routes developed. A local information leaflet and map detailing all these together with information on local history and landmarks (e.g. NTS owned Cunninghame Graham memorial) should be produced, as has been done in other villages in the Park.
Customer Reference: 00074
Organisation: Mountaineering Council of Scotland
Customer Name:
Comment Reference: LDP01/MIR/CONS/00074/1/003
Comment Method: EMAIL
Customer Type: Other Public Organisation

Verbatim Comment:
Without offering a view on specific locations, The MCOFS supports the general thrust of the proposals in respect of strategic tourism development and small scale development.

Customer Reference: 00081
Organisation: (If applicable)
Customer Name:
Comment Reference: LDP01/MIR/CONS/00081/7/001
Comment Method: OLDP
Customer Type: Individual Resident

Verbatim Comment:
You should only support development in an area if it specifically requests support. No-one in Buchanan Castle Estate wants any development at all so please leave us alone.
### Visitor Experience Question 1: Do you agree? Are there any other settlements where we should support tourism investment and development?

We believe that Visitor experience Q1 should include Luss, in addition to those villages already mentioned. If 750,000 visitors are visiting Luss per annum, there is an urgent need to give them more to do.

We believe that an issue has been missed from the list of issues; there is a severe lack of visitor facilities, especially those that provide the non-active visitor with something to do - such as museums, information points, crafty type shops.
Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.5

Visitor Experience Question 1: Do you agree? Are there any other settlements where we should support tourism investment and development?

Customer Reference: 00174

Customer Name: Rob Latimer

Comment Reference: LDP01/MIR/CONS/00174/1/007

Comment Method: OLDP

Customer Type: Individual Resident

Verbatim Comment:
There are some opportunities such as trails (walking, running, cycling) where the links between settlements become key and this should be recognised.
Tourism - as an operator of 4 Star Holiday cottages for 15 years, I can say that there is over supply and prices are being driven down by existing providers. The current prices are below realistic Rates for Return. The continued promotion of planning permission for holiday lets has had the effect of reducing value to the existing providers and taking out accommodation otherwise available for first time homes. If the NP promotes holiday accommodation where prices are below the economic rate of return they will put people out of business or attract outside money which will displace the community. Action: stop the growth of development for holiday use.
We support the key locations identified for strategic tourism development in the national park, including Drymen.

Visitor Experience Q1
The identified settlements within Stirling Council area are considered appropriate.
Visitor Experience: We generally support the Preferred Option to continue to direct larger scale tourism development to within or adjacent to settlements. We would ask that the Proposed Plan should clearly indicate that with the exception of committed trunk road transport improvements, and, as above, any requirement for mitigation resulting from development will require to be developer financed.

Visitor Experience Question 1: Do you agree? Are there any other settlements where we should support tourism investment and development?

Yes, but the banner for Callander on the map on page 49 is wrong. We would prefer: Callander the primary settlement and destination in the Park.
Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.5

Visitor Experience Question 1: Do you agree? Are there any other settlements where we should support tourism investment and development?

Customer Reference: 00144
Customer Name: (If applicable)
Organisation: Loch Lomond Steamship Company
Comment Reference: LDP01/MIR/CONS/00144/1/003
Comment Method: EMAIL
Customer Type: Private Business

Verbatim Comment:
VISITOR EXPERIENCE Q.1

Agreed, but while Blairmore, Strone, & Kilmun are specifically highlighted for sea access (via their piers), there is no mention of a similar approach to Loch Lomond, i.e. no mention of piers at Balloch, Luss, and Tarbet (all in public ownership), nor of Balmaha, Rowardennan, and Inversnaid (all in private ownership and two pier have restricted access and in poor condition).
### Visitor Experience Question 1: Do you agree? Are there any other settlements where we should support tourism investment and development?

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<tr>
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</table>

| Customer Reference:   | 00168                                                                                                                                   |
| Customer Name:        | A Peebles                                                                                                                             |
| Comment Reference:    | LDP01/MIR/CONS/00168/1/005                                                                                                           |
| Comment Method:       | OLDP                                                                                                                                   |

**Verbatim Comment:**

I don't agree. The ideas you have shown in Charrette responses are often unrealistic and don't address the problems in the areas. You talk about having park and ride from Drymen which struggles with providing parking for existing visitors. Parking opposite the Buchanan Arms hotel frequently causes grid locks. You have reduced the parking up the East Loch side road but failed to provide an alternative yet you suggesting supporting more tourism.
Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.6

Visitor Experience Question 2: Do you agree?

Customer Reference: 00093
Customer Name: Scottish Natural Heritage
Organisation: Scottish Natural Heritage
(If applicable)

Verbatim Comment:
Yes. There needs to be a plan-led approach to clearly define the ‘appropriate’ countryside areas where small scale development will be supported. This should be informed by, amongst other things, impacts on nature, landscapes and public access. In addition, the plan needs to very clearly define ‘small scale’ and ensure that large scale developments in inappropriate locations do not proceed through a number of sequential applications for small scale proposals.

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.6

Visitor Experience Question 2: Do you agree?

Customer Reference: 00106
Customer Name: Anne Lee
Organisation: Scottish Natural Heritage
(If applicable)

Verbatim Comment:
It is difficult to answer this question without greater explanation of what is meant by 'small scale development'. For example I would support the idea of allowing what you describe as 'low impact and informal camping experiences', whereas a caravan park or a row of chalets in the countryside or within a 'groups of buildings' is much more problematic.
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.6

Visitor Experience Question 2: Do you agree?

Customer Reference: 00108
Customer Name: Susan Calder
Comment Reference: LDP01/MIR/CONS/00108/1/005
Comment Method: OLDP
Customer Type: Individual Resident

Verbatim Comment:
I THINK THAT IT IS IMPERITIVE THAT THE IMMEDIATE LOCAL COMMUNITY THAT IS AFFECTED BY SUCH DEVELOPMENTS SHOULD HAVE A RIGHT TO VETO PROPOSALS.

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.6

Visitor Experience Question 2: Do you agree?

Customer Reference: 00081
Customer Name:  
Comment Reference: LDP01/MIR/CONS/00081/5/001
Comment Method: OLDP
Customer Type: Individual Resident

Verbatim Comment:
Any development should have to be passed by the people in the local area, not your planners as their track record is abysmal. When I say the local area, I mean just i.e. I should have no say on matters to do with Balmaha and they should have no say in matters to do with Buchanan Castle Estate. Again, there is no need or desire for economic development within Buchanan Castle Estate so please leave us out of your plans altogether.
4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.6

Visitor Experience Question 2: Do you agree?

Customer Reference: 00113
Customer Name: Luss Estates Company
Comment Reference: LDP01/MIR/CONS/00113/1/011
Verbatim Comment: Yes, we agree.

Customer Reference: 00169
Customer Name: David Morris
Comment Reference: LDP01/MIR/CONS/00169/1/005
Verbatim Comment: While in principle, this seems sensible; it all depends on the detail. For example, "small scale" is undefined, yet at this stage it should have been. What is small scale to the Park may be quite different to an affected community.

The overriding principle here must be that local communities must determine what happens in their own patch. This seems to be in line with the Scottish Parliament’s Community Empowerment Bill.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
<table>
<thead>
<tr>
<th>Customer Reference: LDP01/MIR/CONS/00174/1/008</th>
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<th>Customer Type: Individual Resident</th>
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<tbody>
<tr>
<td>Visitor Experience Question 2: Do you agree?</td>
<td>Organisation: Rob Latimer</td>
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</tr>
<tr>
<td>Customer Reference: 00174</td>
<td>Customer Name: Latimer</td>
<td></td>
</tr>
<tr>
<td>Customer Name: Rob Latimer</td>
<td>Organisaton: Stirling Council</td>
<td>Customer Type: Individual Resident</td>
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<tr>
<td>Visitor Experience Question 2: Do you agree?</td>
<td>Organisation: Stirling Council</td>
<td>Customer Type: Local Government</td>
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<td>Comment Reference: LDP01/MIR/CONS/00212/1/004</td>
<td>Customer Name: Stirling Council</td>
<td>Customer Type: Local Government</td>
</tr>
<tr>
<td>Verbatim Comment: Visitor Experience Q2</td>
<td>It is agreed that appropriate countryside areas should be identified and this would allow for further comment at the Proposed Plan stage.</td>
<td></td>
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</tbody>
</table>
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.6

Visitor Experience Question 2: Do you agree?

Customer Reference: 00088
Customer Name: Callander Community Council
Comment Reference: LDP01/MIR/CONS/00088/3/002
Comment Method: OLDP
Customer Type: Local Public Body

Verbatim Comment:
We disagree with the second part of this comment. It should read: We think that small scale development should be supported in appropriate countryside areas.

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.6

Visitor Experience Question 2: Do you agree?

Customer Reference: 00105
Customer Name: David Lee
Comment Reference: LDP01/MIR/CONS/00105/1/005
Comment Method: OLDP
Customer Type: Individual Resident

Verbatim Comment:
Great care should be taken when mixing tourist and residential accommodation as the lifestyles of both in timing and noise levels do not mix well.

Whenever possible preference to new visitor accommodation should be given to those areas already identified in the Local Plan for that purpose. Occupation rates should form part of the planning process so that a need for more holiday accommodation can be identified rather than relying on poorly researched business plans.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivelpark.com
4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.6

Visitor Experience Question 2: Do you agree?

Customer Reference: 00154
Customer Name: James Kennedy
Comment Reference: LDP01/MIR/CONS/00154/1/004
Organisation: (If applicable)
Comment Method: EMAIL
Customer Type: Individual
Resident

Verbatim Comment:
I was surprised by the absence of reference to the inter-relationship with the Forestry Commission, the NHS and relevant Local Authorities given that sometimes their decisions will have an impact on the National Park. An example here is that several months ago the Forestry took away the visitor noticeboard in their car park in Kinlochard and have not replaced it, so visitors come with an expectation of a walk, find there is no walk information and leave unhappy—a small example but if replicated across the park the impact will be very negative.

I could not see any reference to the management of the water environment which can be threatened by waste from humans and boat engines. There is no reference to policy in relation to jet skis and sea planes which are active in the area.
Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.6

Visitor Experience Question 2: Do you agree?

Customer Reference: 00168
Customer Name: A Peebles
Comment Reference: LDP01/MIR/CONS/00168/1/006
Verbatim Comment: I would agree with this IF (and only IF) you involve the local communities in the decision making process.

Customer Reference: 00168
Customer Name: A Peebles
Comment Reference: LDP01/MIR/CONS/00168/1/013
Verbatim Comment: P14 Work with communities to decide how much more future visitor accommodation/ facilities and infrastructure are required and are sustainable

Customer Reference: 00168
Customer Name: A Peebles
Comment Reference: LDP01/MIR/CONS/00168/1/006
Verbatim Comment: I would agree with this IF (and only IF) you involve the local communities in the decision making process.
## Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.6

### Visitor Experience Question 2: Do you agree?

<table>
<thead>
<tr>
<th>Customer Reference:</th>
<th>00172</th>
<th>Organisation:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Customer Name:</td>
<td>Greig Morris</td>
<td>(If applicable)</td>
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<tr>
<td>Comment Reference:</td>
<td>LDP01/MIR/CONS/00172/1/008</td>
<td>Comment Method: OLDP</td>
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<tr>
<td>Customer Type:</td>
<td>Individual Resident</td>
<td></td>
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</table>

**Verbatim Comment:**

In principle this seems appropriate but again it depends entirely on the detail. It is open to interpretation for example "small scale". Overall it must be ensured that local communities determine their own future and decision making.

---

## Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.6

### Visitor Experience Question 2: Do you agree?

<table>
<thead>
<tr>
<th>Customer Reference:</th>
<th>00173</th>
<th>Organisation:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Customer Name:</td>
<td>Isabella Morris</td>
<td>(If applicable)</td>
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<tr>
<td>Comment Reference:</td>
<td>LDP01/MIR/CONS/00173/1/008</td>
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<tr>
<td>Customer Type:</td>
<td>Individual Resident</td>
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</tbody>
</table>

**Verbatim Comment:**

"Small scale" is very ambiguous and misleading. The over riding principle here must be that local communities must determine what happens in their own area. This seems to be in line with the Scottish Parliament’s Community Empowerment Bill Options and solutions for Rural Economy.
4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.7

Visitor Experience Question 3: Where should new provision for camping and motor-homes be supported?

RE: Where should new provision for camping and motor-homes be supported?

We would suggest that a plan-led approach (setting out spatially exactly where sites of different sizes and types should and should not go) should take into account (amongst other things) possible impacts on nature and landscapes. A key aspect of this will be to ensure there are robust policies that avoid informal campsites becoming permanent caravan sites on hard standing. Particular care should be taken in relation to semi-natural woodlands and water courses. Proposals that appear to ‘slot’ pitches between trees can often have serious impacts on ground flora and tree roots. In addition, there will be woodlands where disturbance to sensitive species will be an issue. There may be some opportunities for such activities in some plantation woodlands that are of less value in terms of biodiversity, however this should not be at the expense of opportunities to restore semi-natural woodland on sites that are currently plantations on ancient woodland sites (PAWS).

Given the sensitivity of some of the watercourses in the Park, the plan should set out how the risks of discharge from chemical toilets will be managed in areas provided for motorhomes.

There should also be a careful assessment of the capacity of different landscape types to accommodate these different types of sites. The plan should also ensure a reasonable distance between small scale sites so that cumulatively they don’t have a significant impact on landscape character or raise potential issues in terms of impacts on protected species.
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.7

Visitor Experience Question 3: Where should new provision for camping and motor-homes be supported?

Customer Reference: 00113
Customer Name:
Comment Reference: LDP01/MIR/CONS/00113/1/012

Verbatim Comment:
West Loch Lomond side needs greater provision for motor homes / camping. Firkin point is an obvious example.

Customer Reference: 00174
Customer Name: Rob Latimer
Comment Reference: LDP01/MIR/CONS/00174/1/009

Verbatim Comment:
This is highly site specific and depends on the type of camping etc, how much infrastructure is needed nearby. Access and local infrastructure are the major issues but also proximity to residential areas or environmentally sensitive sites could become a concern. The major gap around Callander seems to be camping spaces for tents.
Visitor Experience Question 3: Where should new provision for camping and motor-homes be supported?

Customer Reference: 00185
Customer Name: 
Organisation: Scottish Government
Comment Reference: LDP01/MIR/CONS/00185/1/006
Comment Method: EMAIL
Customer Type: National Government

Visitor Experience Comment:
Visitor Experience - The need to continue to make progress in delivering tourism uses is noted, as is the need to address the sites identified for tourism/recreational uses in the existing Local Plan which have not been developed. We welcome the reference to scenic routes and would look to the Proposed Plan to provide support for this initiative. In addition, the national long distance walking and cycling network is identified as a national development in NFP 3 and as such, the Proposed Plan should give this appropriate recognition.

We would highlight the updated reference to tourism in SPP 2014 which states that ‘Development Plans should be informed by the Tourism Development Framework for Scotland in order to maximise the sustainable growth of regional and local visitor economies’.

Visitor Experience Question 3 - In relation to this, we would highlight that SPP 2014 introduces a policy on huts which has not existed previously and it will be important for the NPA to provide policy guidance on such forms of development if relevant in the Park.
### Visitor Experience Question 3: Where should new provision for camping and motor-homes be supported?

Customer Reference: 00088  
Customer Name: (If applicable)  
Comment Reference: LDP01/MIR/CONS/00088/3/003  
Comment Method: OLDP  
Customer Type: Local Public Body

Verbatim Comment:
Callander has 2 good facilities for caravans and motor homes but no provision for tents. Make provision for tented camping at the existing facilities and it would attract a range of campers and possibly reduce the numbers camping along loch sides.

### Options and Solutions for Visitor Experience Question 4: What option do you prefer? Why?

Customer Reference: 00045  
Customer Name: (If applicable)  
Comment Reference: LDP01/MIR/CONS/00045/1/004  
Comment Method: EMAIL  
Customer Type: Local Public Body

Verbatim Comment:
Issues and Opportunities, page 55. 2nd bullet point re roads infrastructure, etc and footpaths, KCC agree but suggest Core Paths should be added to this. Evidence of stronger influence of the NP on actual implementation of roads issues with local authorities would be good. KCC suggest that a further bullet point be added re provision of public toilets.
### Options and Solutions for Visitor Experience Question 4: What option do you prefer? Why?

**Customer Reference:** 00092  
**Organisation:** West Dunbartonshire Council

**Customer Name:**  
**Comment Reference:** LDP01/MIR/CONS/00092/1/002  
**Comment Method:** OLDP  
**Customer Type:** Local Government

**Verbatim Comment:**  
This Council agrees that Balloch should be identified as a key location for strategic tourism development. Small scale tourism development should be supported in the countryside, with guidance defining which countryside areas are most appropriate for this type of development. The Council would be supportive of camping and motor home provision in appropriate locations within the West Dunbartonshire part of the Park.

---

**Customer Reference:** 00093  
**Organisation:** Scottish Natural Heritage

**Customer Name:**  
**Comment Reference:** LDP01/MIR/CONS/00093/1/009  
**Comment Method:** OLDP  
**Customer Type:** Public Body

**Verbatim Comment:**  
We support the option based on the National Park Partnership Plan. As the SEA indicates, the alternative option is likely to have a negative impact in terms of promoting sustainable travel modes.
<table>
<thead>
<tr>
<th>Chapter Commented on:</th>
<th>4 Identifying the Main Issues - what needs major change and what are the options? &gt;&gt; 4.3 Main issues, potential options and solutions &gt;&gt; 4.3.8</th>
</tr>
</thead>
</table>

**Options and Solutions for Visitor Experience Question 4: What option do you prefer? Why?**

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**Verbatim Comment:**

"Please request HPB (Holiday Property Bond) to build a holiday development. HPB have a large captive tourist audience with money to spend. Their own holiday sites run well beyond the holiday season and some all the year round. A good example is Tigh Mor at Loch Achray, in the Trossachs" 

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<tr>
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**Options and Solutions for Visitor Experience Question 4: What option do you prefer? Why?**

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<tr>
<th>Customer Reference:</th>
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<tr>
<td>Customer Name:</td>
<td>Luss Estates Company</td>
</tr>
<tr>
<td>Comment Reference:</td>
<td>LDP01/MIR/CONS/00113/1/013</td>
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<td>Comment Method:</td>
<td>OLDP</td>
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<td>Customer Type:</td>
<td>Private Business</td>
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**Verbatim Comment:**

Luss Estate prefer the preferred option as described, but only on the basis that west Loch Lomond side is included. This area has excellent connectivity via the A82, and suffers from a lack of visitor provision currently.
Options and Solutions for Visitor Experience Question 4: What option do you prefer? Why?

Customer Reference: 00169
Customer Name: David Morris
Comment Reference: LDP01/MIR/CONS/00169/1/010

Organisation: (If applicable)
Comment Method: OLDP
Customer Type: Individual Resident

Verbatim Comment:
I support your preferred option, provided that you adhere to the rules.

This proviso is based on recent planning approvals that you made that ignored or over-ruled the policy that a significant tourism development had to have a sustainable local transport system. Also it had inadequate infrastructure.
4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.8

Options and Solutions for Visitor Experience Question 4: What option do you prefer? Why?

Customer Reference: 00174
Customer Name: Rob Latimer
Comment Reference: LDP01/MIR/CONS/00174/1/010
Comment Method: OLDP
Customer Type: Individual Resident

Verbatim Comment:
The preferred option seems to have sufficient inherent flexibility in part (b) and I would suggest that the alternative proposed is not necessary since any proposal which demonstrates clear reason for a departure to the stated plan could be competently approved in any case.

Customer Reference: 00212
Customer Name: Stirling Council
Comment Reference: LDP01/MIR/CONS/00212/1/005
Comment Method: EMAIL
Customer Type: Local Government

Verbatim Comment:
The preferred option is supported. The approach to continue to direct larger scale tourism development to within or adjacent to settlements and small scale development to where there is existing infrastructure, services and transport is welcomed.
### Main Issues Report Our Live Park Comments Received

#### Chapter Commented on:
4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.8

<table>
<thead>
<tr>
<th>Options and Solutions for Visitor Experience Question 4: What option do you prefer? Why?</th>
</tr>
</thead>
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| Customer Reference: | 00088 | Organisation: | Callander Community Council |
| Customer Name: | | (If applicable) |
| Comment Reference: | LDP01/MIR/CONS/00088/3/004 | Comment Method: | OLDP |
| Customer Type: | Local Public Body |

**Verbatim Comment:**
Support small scale development to support small businesses throughout the Park.

---

| Customer Reference: | 00127 | Organisation: | M And M Quality Homes |
| Customer Name: | M And M Quality Homes | (If applicable) |
| Comment Reference: | LDP01/MIR/CONS/00127/1/001 | Comment Method: | EMAIL |
| Customer Type: | Private Business |

**Verbatim Comment:**
Support the preferred option of small scale improvements to existing tourism and visitor facilities.

---

*If you feel any information in this report is incorrect please contact us by email at hello@ourlivelive.com*
Support the identification of the Argyll and Bute communities within the park as the preferred location for larger scale tourism developments and welcome the identification of the countryside areas to the north and south of Loch Eck as locations where smaller scale development will be supported, recognising the infrastructure, links, facilities and services which can be provided in adjoining settlements including those outwith the park.

Visitor experience Q4:- support preferred option as it makes best use of existing infrastructure and services available in communities within and adjacent to the park.
4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.8

Cameron House is a 5* star Category B listed hotel and associated facilities on the south western shores of Loch Lomond, situated between the loch and the A82. Facilities within the hotel grounds, all operated by De Vere, include a 9 hole golf course, tennis courts, leisure club, 91 no. holiday lodges, several restaurants / bars serving hotel guests and non-resident visitors and a marina. Cameron House is located at the gateway to the National Park from the south, just 2.5km from Balloch. The Carrick is a golf club and spa, located around 2km north of Cameron House along the A82. The Carrick provides a tournament standard golf course which has previously played host to the Ladies Scottish Open and the PGA Cup. Visitor accommodation is also provided within purpose built lodges and conversion of Mansion House and Coach House properties within the grounds. Both facilities benefit from excellent vehicular transport links with direct access from the A82. In the context of the accessibility of the national park, these properties are in an accessible and sustainable location, with bus routes along the A82, connections to cycle / footpath network and proximity to nearby towns of Balloch, Dumbarton and Helensburgh. Both Cameron House and The Carrick are award winning, internationally recognised tourist destinations. They attract considerable visitor numbers to the national park, and play a significant role locally in the local economy, through employment of local people, use of local suppliers and generating linked trips with shops, services and visitor attractions.

Local Development Plan Main Issues Report (MIR) - Firstly, we express support for the emphasis in the MIR for supporting tourism and the local economy. Tourism makes a significant contribution to the national park economy and it is essential that planning policy facilitates appropriate development which will have a positive contribution to the national parks visitor offer. Comments: The MIR identifies the following issues and opportunities within the Park: Issues: Lack of and poor quality visitor infrastructure, limited range and lack of high quality visitor facilities, particularly accommodation across all market sectors; and Opportunities: Additional accommodation development, increased activities for visitors, event development and grow the food and drink offer.

As set out above, De Vere’s assets in the national park Cameron House and The Carrick already provide an important contribution to the national park visitor offer and economy, however there is no specific reference to this in the Main Issues Report. Added to this there is no stated policy support for further development supporting existing tourist assets which could assist in addressing the issues identified. Instead the MIR places a greater emphasis on the delivery of new developments within the park. As such it is requested that the next iteration of the draft Loch Lomond & Trossachs National Park LDP:
- Acknowledges the important role that Cameron House and The Carrick currently play in the National Park economy;
- Provides clear policy support for development of existing facilities, where it would improve and enhance the range and quality of facilities to visitors; and
- Ensure that equal priority is given to the enhancement / expansion of existing facilities and proposals for new tourist facilities.

We set out below our justification for our requested amendments to the LDP in the context of national planning policy.
- Conformity with Planning Policy - Scottish Planning Policy (SPP), published on 23 June 2014, provides an up-to-date reflection of national planning policy.
- Consistency with Evidence Base - Paragraph 86 of SPP states that development Plans for National Parks are expected to be consistent with the National Park Plan, which sets out the management strategy for the Park whilst paragraph 100 requires development plans to be informed by the Tourism Development Framework for Scotland in order to maximise the sustainable growth of regional and local visitor economies.
- The National Park Partnership Plan 2012-2017 (‘National Park Plan’) states that National Parks are national tourism assets with international appeal that need sustainable approaches to visitor management and tourism development, balancing the needs of visitors, communities, businesses and conservation to deliver high quality destinations. It also identifies that - tourism is vital for the economy of the National Park and for the economy of Scotland" (page 12).
- RD Policy 2 (Spatial Development Strategy) of the National Park Plan identifies the priorities for new development in the Park. The policy seeks to ensure that new development in the Park is "in the most sustainable locations with design and siting that safeguard and enhance designated sites or other special qualities". In addition to supporting new strategic tourism development opportunities in locations including, inter alia, Callander, Balloch, Drymen and Tarbet the policy identifies that opportunities for new development in the countryside outwith these areas is likely to be focused on improving and extending existing facilities.

In relation to the Tourism Development Framework, this was published by VisitScotland and sets out key actions for local authorities to improve tourism, including:
- Promoting growth in their visitor economies in development plans;
- Considering further accommodation requirements at locations where there is evidence of market demand including the upgrade or expansion of existing hotels;
- Setting policy to encourage investment in other forms of holiday accommodation in rural areas such as new self-catering accommodation (where deficiencies are identified), bunkhouse provision, holiday parks and novel low carbon development; and
- Identifying areas for rural resorts (destinations where a collection of activities can be undertaken in one defined location) in development plans based on market demand.
- The Tourism Development Framework identifies that rural locations have struggled to attract investment in new hotel / bedroom provision in recent years which is acting as a barrier to future growth of tourism in these areas.

It is clear from the above that there is a requirement in the Tourism Development Framework and National Park Plan for local development plans to plan for further tourism development, with improvement and expansion of existing facilities specifically identified. These documents also identify a need to plan for a range of tourist and visitor facilities from different forms of accommodation types to rural resorts.

As demonstrated by the existing offer at Cameron House and The Carrick, these facilities have the capability to meet a range of visitor needs and any future development would be planned and delivered to meet the market requirements at that time. As such the recognition with the LDP of the potential for Cameron House and The Carrick to accommodate new tourism development - either explicitly or under the definition of an existing visitor asset - would ensure that the development plan policy is consistent with the National Park Plan and Tourism Development Framework, and therefore national planning policy contained in SPP.

Appropriate Location for Development - Paragraph 105 states that local authorities should consider the potential to promote opportunities for tourism and recreation
facilities in their development plans. This may include new developments or the enhancement of existing facilities. It is noted that the Main Issues Report identifies a number of locations for new strategic tourism developments. We do not seek to comments on the individual merits or otherwise of these locations, but it is necessary to consider whether further tourism development could be better provided through the improvement / enhancement of existing facilities.

By virtue of its designation as a National Park, Loch Lomond and The Trossachs is an environmentally sensitive location. The development of existing facilities, which benefit from transport, services and other physical infrastructure in situ, is likely to have a lesser impact than the creation of new facilities from scratch. This is not to suggest that the development of new facilities should be precluded, but the LDP policy should ensure that equal consideration and policy support is afforded to development at existing facilities which would assist equally in meeting the national park objectives.

In summary, De Vere welcome the opportunity to comment on the Main Issues Report of the emerging Loch Lomond and The Trossachs Local Development Plan. De Vere recognise the policy support for further tourism development with the national park. We request, however, that recognition is provided with the plan of the important role currently played by Cameron House and The Carrick within the national park economy. It is essential, that the National Park’s policy document provides the support for further investment and development at existing assets to ensure they can contribute to meeting the national park authority’s objectives of supporting tourism related economic growth.

De Vere is committed to working closely with the National Park authority, and any future development proposals at either Cameron House or The Carrick would be brought forward in collaboration with the park authority. It is noted that more detailed supplementary guidance will be provided in due course which will provide more detailed guidance on different development types, such as visitor accommodation and visitor facilities. De Vere is keen to be kept informed on the production of this guidance and provide comments where relevant.
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.8

Options and Solutions for Visitor Experience Question 4: What option do you prefer? Why?

Customer Reference: 00168
Customer Name: A Peebles
Comment Reference: LDP01/MIR/CONS/00168/1/007
Organisation: (If applicable)
Comment Method: OLDP
Customer Type: Individual Resident

Verbatim Comment:
Option B providing the communities are able to confirm there is 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.
Infrastructure and Services Question 1: Do you agree with the opportunities listed above? Are there others?

Do you agree with the opportunities listed? Are there others?

There may be opportunities for growth in small scale hydro, but given the number of existing and consented schemes, it would be helpful to discuss what the risks are (if any) of cumulative effects and whether there were aspects of current schemes that would be worth monitoring to inform future decision-making. For example, in theory there could be a potential cumulative impact from the alteration of sediment transport in the headwaters of burns in SAC catchments. It would be useful to understand more about the scale of the impacts in the context of sediment movements through the catchment(s). The purpose of this type of work would be to remove uncertainty for developers and avoid the need to take a precautionary approach on a case by case basis. We would be keen to discuss how this work might be progressed.

It would also be helpful for the plan to specifically address impacts from hydro access tracks and set out its approach to considering applications to make temporary tracks permanent.
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.9

Infrastructure and Services Question 1: Do you agree with the opportunities listed above? Are there others?

Customer Reference: 00055
Customer Name: Strathard Community Council
Comment Reference: LDP01/MIR/CONS/00055/1/005
Comment Method: EMAIL
Customer Type: Local Public Body

Verbatim Comment:
Parts of Strathard are thriving. Tourism is the main economic driver; additionally, there are some small local businesses that are successful and are good employers of local people.

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.9

Infrastructure and Services Question 1: Do you agree with the opportunities listed above? Are there others?

Customer Reference: 00113
Customer Name: Luss Estates Company
Comment Reference: LDP01/MIR/CONS/00113/1/014
Comment Method: OLDP
Customer Type: Private Business

Verbatim Comment:
Yes, we agree, but the importance of promoting business should be more prominent.
I agree one of the key barriers to the creation and development of rural business is the total inadequacy of effective broadband in the Drymen area. There is a need for a step change in speed. We are aware that Balloch has reported land line based speeds of up to 100Mbs and they also enjoy an extremely fast 4G service. As I understand it Balloch has a fiber optic infrastructure. Balloch is only 9 miles from Drymen.
Secondly, and this is something that I have thought, even dreamed of, for about 50 years, is car ferry connection between Inversnaid and the western side of Loch Lomond at some approprite point between Inveruglass and Tarbet. Tourism is the practice of touring and nowadays that is substantially done by car. To travel from Aberfoyle to the western end of Loch Katrine and on to Inversnaid is a substantially pointless jouney because you must simply return as you have come. My family and I have done it on only two occasions in 50 years and most of my friends and acquaintances have never done it! I am not suggesting seagoing size vessels but perhaps the vessels that ply between Largs and Cumbrae and the service that they deliver would be a good model. Such a connection would, I suggest be a great boon to tourist - day trippers or holidaymakers - and would help to encourage tourist related business - cafes, restaurants, B&B’s etc - all along the route from Aberfoyle but particularly at the western end of Loch Katrine around Stronachlachar. This would go along way to opening that area from Aberfoyle to Inversnaid to the public and to business of the type that I have mentioned and to others needed to service them.

I would imagine that any number of ferry companies, many form abroad, would be interested in tendering for that service which could turn out to be very lucrative.
Infrastructure and Services Question 1: Do you agree with the opportunities listed above? Are there others?

Customer Reference: 00212
Customer Name:
Comment Reference: LDP01/MIR/CONS/00212/1/006
Comment Method: EMAIL
Customer Type: Local Government

Verbatim Comment:
Infrastructure & Services Q1- Do you agree with the opportunities listed
Yes.
### Infrastructure and Services Question 1: Do you agree with the opportunities listed above? Are there others?

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<th>Organisation:</th>
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<td>Customer Type:</td>
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**Verbatim Comment:**

Q1 Do you agree with the opportunities listed? Are there others?

**A.** There is no question asking whether we agree with the issues. We therefore wish to make the following comments:

- The demand for travel is determined by where people choose, or have the opportunities, to live, work and access facilities. As we must seek to provide infrastructure to support communities, we must also be careful about land use policies that create a demand for infrastructure where it may not be able to be provided or maintained.

- It is stated that there are poor local and trunk roads and car parks. We are sure that the community perception is of poor road quality and that all authorities would prefer for all their roads to be in a good condition. However, in trying to understand what the purpose of the statement is, it may be useful to consider:

  - Making reference to evidence showing the impact of road condition on investment / locational decisions and/or visitor experience

  - Whether there is a realistic opportunity to improve the road condition over and above what is currently being undertaken by each of the authorities given funding constraints?

  - Whether the local development plan seeking to secure developer contributions towards road maintenance?

In addition, it would be helpful to expand on the issue of poor pavements (an issue highlighted during the Council’s recent consultation on the Local Transport Strategy’s delivery plan for the rural area, ‘The Towns, Villages and Rural Area Transport Plan’). It is useful – if we want the LDP to help improve the situation - to make clear that there is a lack of footways or safe walking routes) within the rural area to enable dispersed communities access facilities.

- ‘Infrastructure and Services’ includes public transport as well as roads. Public transport is an important service. Even within the national park area in Stirling, approximately 15% of households do not have access to a car. This is an area where there are limited local employment and facilities.
Main Issues Report Our Live Park Comments Received

-The infrastructure section does not currently make reference to the issue of the level (and cost) of public transport provision in rural areas.

-As has been referenced above, the Council have recently undertaken (2013) a consultation on the Local Transport Strategy’s delivery plan for the rural area, ‘The Towns, Villages and Rural Area Transport Plan’. This public consultation exercise emphasised the key transport issues in the rural area (including the national park area) being:

  Impact of traffic on communities
  Ability to access services and opportunities
  Opportunities for walking and cycling
  The quality of the street environment

B. With reference to the opportunities:

-With reference to the statement “new housing development can increase the demand and viability of services and infrastructure”. Whilst this is true, we must be careful not to assume that new development will enable the introduction, or indeed protection, of services (including public transport).

-With reference to the statement “commercial development, contributing to improved infrastructure, can unlock development”. For development to contribute to improved transport infrastructure, appropriate policies, supplementary guidance and supporting evidence is required. Policies requiring a realistic choice of access, and where appropriate, development contributing to infrastructure which is contained within a plan which has gone through a public consultation exercise (such as the ‘Towns, Villages and Rural Area Transport Plan’) can help achieve improved transport infrastructure.
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<td>00088</td>
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<td>Verbatim Comment:</td>
<td>Agree with this.</td>
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<td>Organisation:</td>
<td>Callander Community Council</td>
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<td>(If applicable)</td>
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<td>OLDP</td>
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<tr>
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<td>Local Public Body</td>
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</table>

Infrastructure and Services Question 1: Do you agree with the opportunities listed above? Are there others?

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.9

Infrastructure and Services Question 1: Do you agree with the opportunities listed above? Are there others?

Customer Reference: 00143  
Customer Name:  
Comment Reference: LDP01/MIR/CONS/00143/1/003  
Comment Method: EMAIL  
Organisation: Homes for Scotland  
Customer Type: Other  
Organisation

Verbatim Comment:

Mir 62 - Affordable Housing

The MIR states that there needs to be a more flexible policy approach. However, the only real response in the MIR is to remove the requirement for some sites in high-pressure areas to deliver 100% affordable housing. Otherwise, a general requirement for a minimum 25%, with 50% in some named settlements, remains the policy. There is an acknowledgement that viability considerations could apply on a site-by-site basis. This does not recognise the fundamental issue that an affordable housing requirement has to be viable and deliverable. Scottish planning policy has now recognised that an affordable housing requirement should not be more than 25%, on the basis that anything higher becomes undeliverable. It is no surprise that so little housing has been built in the park area faced with this and other onerous policy burdens.

The suggestion that the requirement, in terms of units or commuted sums, should be increased for sites of 3 or less runs exactly contrary to the need to ensure that small-scale developments are viable, diverse and generate sufficient return to landowners to incentivise them to promote rural development. It is acknowledged earlier in the MIR that a more flexible approach could be taken on sites of 3 or less, particularly in rural areas, where more allowance could be made for development which would cross-subsidise a mix including lower-cost/affordable housing. However, page 62 seems to contradict that or suggest a different and unrealistic approach.

The suggestion that time limits could be placed on affordable housing - say 10 years rather than in perpetuity - to encourage landowners and investors to build affordable housing is welcome. Attempting to secure affordable housing in perpetuity only really works when the housing remains in the ownership of an RSL or where the public sector retains a controlling share of equity. It simply does not work for housing provided unsubsidised by developers.

Suggestions:

Affordable housing requirement should be a maximum, not minimum, of 25% in all areas. More housing land in marketable areas will assist in increasing affordable delivery as well as market housing.
Provision on sites of 3 or less units is not realistic. Any commuted sum has to be modest, and weighed against the other economic benefits that may arise from small-scale mixed development in rural areas. The incentive to landowners to develop must be carefully preserved.

Adjacent to settlement boundaries, there is no justification for a requirement for 100% affordable housing. This is undeliverable.

Reducing any affordable housing occupancy restriction to 10 years is a policy worth trying.

---

**Infrastructure and Services Question 1: Do you agree with the opportunities listed above? Are there others?**

Q.1  Agreed, but infrastructure should include piers.

Q2:  We believe all piers (on Loch Lomond) need to be in public ownership. We propose that a policy be worked up to achieve this.

A review should be carried out to revise and update the policy on signage.
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<td>4 Identifying the Main Issues - what needs major change and what are the options? &gt;&gt; 4.3 Main issues, potential options and solutions &gt;&gt; 4.3.9</td>
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<td>LDP01/MIR/CONS/00168/1/008</td>
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<td>Individual Resident</td>
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<td>Infrastructure and Services Question 1: Do you agree with the opportunities listed above? Are there others?</td>
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<tr>
<td>Verbatim Comment:</td>
<td>I would agree with the problems and opportunities but am cynical of the realities of your ability to provide the resources to improve the situation without major funding from Government which I doubt will be forthcoming.</td>
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<td>4 Identifying the Main Issues - what needs major change and what are the options? &gt;&gt; 4.3 Main issues, potential options and solutions &gt;&gt; 4.3.9</td>
<td>00173</td>
<td>Isabella Morris</td>
<td>LDP01/MIR/CONS/00173/1/009</td>
<td>(If applicable)</td>
<td>OLDP</td>
<td>Individual Resident</td>
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<td>Infrastructure and Services Question 1: Do you agree with the opportunities listed above? Are there others?</td>
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<tr>
<td>Verbatim Comment:</td>
<td>Rowardennan pier is badly in need of repair and during the peak summer months a regular check of popular spots on the islands is required. Litter is totally unacceptable on these beautiful islands. Some bins would help.</td>
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<td>Customer Reference:</td>
<td>00088</td>
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<tr>
<td>Customer Name:</td>
<td>Callander Community Council (If applicable)</td>
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<td>Local Public Body</td>
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Verbatim Comment:
Consult with the Community Council.
Main Issues Report Our Live Park Comments Received

Infrastructure and Services Question 2: How best to deliver improvements to infrastructure that benefits communities and visitors through new development?

Customer Reference: 00093
Organisation: Scottish Natural Heritage
Customer Name:
Comment Reference: LDP01/MIR/CONS/00093/1/011
Comment Method: OLDP
Customer Type: Public Body

Verbatim Comment:
We have suggested below a couple of developments where new active travel routes or new off road path networks would enhance development proposals:

- SNH would be pleased to advise on the natural heritage and access opportunities prior to the preparation of any master plans and design guides for the long term development sites at Callander, Tyndrum, Succoth and Crianlarich
- We note that the Rob Roy Way provides off road access to Aberfoyle but, in practice, visitors are likely to use the A81 so it may be sensible to consider whether a safe off road path network is needed adjacent to the trunk road, at least to where it joins the A821 at the Rob Roy Motel.
- Although there is a pavement along the trunk road from the Ben Arthur Resort to Succoth/Arrochar, this is not a pleasant route for walkers. We suggest that options are explored for a more enjoyable off road route into Succoth/Arrochar from this resort.
- The preferred option text on page 88 does include ‘support for improved footpath and cycle path connections to Drymen’ however this does not appear on the proposals map. A key element of the findings from the Balmaha/Drymen Charette was that a better off road link between Balmaha and Drymen was needed to the south of the B837. This ‘key initiative’ is set out on Page 65 of the Charette report for Balmaha and Drymen. It involves promoting use of existing path network south of the B837 and incorporating opportunities to experience the National Nature Reserves at Endrick Mouth.
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<th>Chapter Commented on:</th>
<th>4 Identifying the Main Issues - what needs major change and what are the options? &gt;&gt; 4.3 Main issues, potential options and solutions &gt;&gt; 4.3.10</th>
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<td>Infrastructure and Services Question 2: How best to deliver improvements to infrastructure that benefits communities and visitors through new development?</td>
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<tr>
<td>Customer Reference:</td>
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<tr>
<td>Organisation:</td>
<td>Luss Estates Company</td>
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<tr>
<td>Customer Name:</td>
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<tr>
<td>Comment Reference:</td>
<td>LDP01/MIR/CONS/00113/1/015</td>
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<td>Comment Method:</td>
<td>OLDP</td>
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<td>Customer Type:</td>
<td>Private Business</td>
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<tr>
<td>Verbatim Comment:</td>
<td>Argyll &amp; Bute Council have a very large part to play in this, and our view would be that they are not involved enough. It is vital the LLTNPA &amp; A&amp;BC work together in this regard.</td>
</tr>
</tbody>
</table>
4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.10

Infrastructure and Services Question 2: How best to deliver improvements to infrastructure that benefits communities and visitors through new development?

In terms of improvements to transport infrastructure for both communities and visitors the following is encouraged:

Ensuring the integration between the development plan and the relevant national, regional and local transport infrastructure plans. In particular we would encourage the strongest possible integration with Stirling’s Local Transport Strategy which covers the Stirling Council area, and the ‘Towns, Villages and Rural Area Transport Plan’ which sets out how we propose to deliver the LTS in the national park area. By doing so it can be ensured that the transport and development plans are both addressing the same problems and working towards the same solutions in a complementary manner.

Ensuring that the development plan provides policies that support and enable these solutions to be brought forward. In particular supporting:

- the provision of a realistic choice of access to facilities and opportunities by:
  - requiring the provision of appropriate facilities if these do not already exist, and/or making contributions to enable these facilities to be provided. Stirling’s Local Transport Strategy’s ‘Towns, Villages and Rural Area Plan’ includes packages of measures for individual settlements and corridors to address the access and travel demands in those localities. These settlement and corridor packages can be used, and developed further, to identify measures which it may be appropriate to seek developer contributions towards measures which will help ensure that the travel demands of the development are addressed in an appropriate manner (in terms of reducing the impact of the development on the community and ensuring a realistic choice of access to that development)

- those transport measures which seek to address the issues and objectives of the development plan, particularly those which relate to economic (supporting rural industries including tourism), social (access to services and opportunities) and environmental (climate change, noise, air quality, adaption) objectives.
**Main Issues Report Our Live Park Comments Received**

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<td><strong>Customer Reference:</strong></td>
<td>00172</td>
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<tr>
<td><strong>Customer Name:</strong></td>
<td>Greig Morris</td>
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<td><strong>Comment Reference:</strong></td>
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<td>Individual Resident</td>
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**Infrastructure and Services Question 2: How best to deliver improvements to infrastructure that benefits communities and visitors through new development?**

Verbatim Comment:

Although not entirely related, I believe it would be of considerable value to fix the existing Rowardennan Pier as this could be done for very little cost and would be an asset to the area.

I also believe greater emphasis should be placed on addressing the amount of litter both on the east side of Loch Lomond through bin provision and also on the islands themselves.
Infrastructure and Services Question 3: How can the retention and improvement of key community services such as schools, healthcare, road and broadband be supported?

Customer Name: Callander Community Council
Customer Reference: LDP01/MIR/CONS/00088/4/003
Verbatim Comment: Partnership approach to long term planning with National Park, Stirling council and the Community Council.

Customer Name: Luss Estates Company
Customer Reference: LDP01/MIR/CONS/00113/1/016
Verbatim Comment: We would suggest that a key part of the solution is for the LLTNPA to look outwards, and consider the role of commuting to grow Park communities.
Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.11

Infrastructure and Services Question 3: How can the retention and improvement of key community services such as schools, healthcare, road and broadband be supported?

Customer Reference: 00193
Customer Name: Gavin MacLellan
Comment Reference: LDP01/MIR/CONS/00193/1/005
Comment Method: EMAIL

Verbatim Comment:
Infrastructure - this is "Third-world Class". Having spent 2 hours driving to Crianlarich, I can say the road pavement is dangerous (24 inch drop into verge in places) the whole road and communication system is incapable of sustaining the current load without routine incidents that deter prosperity.

The A82 Pulpit Rock project is taking far too long and is completely insufficient - (Third world contract execution). This is just one part of a hopeless infrastructure that is a shame to live in. Phone cables lay unfixed and unprotected in many places. For example, the Core Path from Balloch to Gartocharn has never been built and the current path has at least two high risk points where walkers have to walk on the main road. The infrastructure should be brought up to World Class before any further developments are considered. The Balloch Park Office should be used for project managing and engineering above all else. The present rate of improvement is insufficient to satisfy any of the plans or sustain the resident population. Let’s be proud of where we live and give good jobs getting it in order.
Infrastructure and Services Question 3: How can the retention and improvement of key community services such as schools, healthcare, road and broadband be supported?

We would support the intention to focus development in existing settlements to both aid the retention and improvement of services, as well as help reduce the need to travel (if local facilities exist).
Options & Solutions for Infrastructure & Services Question 4: Do you agree with the options listed above? Any further suggestions?

Customer Reference: 00092
Customer Name: West Dunbartonshire Council
Comment Reference: LDP01/MIR/CONS/00092/1/003
Comment Method: OLDP
Customer Type: Local Government

West Dunbartonshire Greenspace has identified a requirement for a cemetery extension in Gartocharn and a preferred site at Kilmaronock Church. It is proposed to the National Park Authority that this site should be included in the new Local Development Plan.
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<tr>
<td>Customer Name:</td>
<td>Anne Lee</td>
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<td>Comment Reference:</td>
<td>LDP01/MIR/CONS/00106/1/007</td>
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<tr>
<td>Customer Type:</td>
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**Options & Solutions for Infrastructure & Services Question 4: Do you agree with the options listed above? Any further suggestions?**

- **I agree/disagree with the following of the MIR options:**
  
  - **Continued to focus new development in or adjacent to existing settlements - that will help secure existing public services** - (AGREE with a change ie I would change 'adjacent' to 'contiguous', otherwise there is too much room for interpretation)
  
  - **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 (DISAGREE as I disagree with the preferred Rural Economy option)
  
  - **Identify priorities for infrastructure or service improvements that new development may be required to contribute to each settlement in the Local Development Plan** AGREE
  
  - **Secure greater planning contributions for infrastructure, service provision, maintenance or improvements** AGREE but only if park principles are not sacrificed to achieve this
  
  - **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'** AGREE

*If you feel any information in this report is incorrect please contact us by email at hello@ourlivelpark.com*
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.12

Options & Solutions for Infrastructure & Services Question 4: Do you agree with the options listed above? Any further suggestions?

Customer Reference: 00107
Customer Name: Non Attributable
Comment Reference: LDP01/MIR/CONS/00107/1/078
Comment Method: ONLINE
Customer Type: Information not available

Verbatim Comment:
Mobile/broadband access is essential.
Improving broadband speed and coverage in the rural parts of the National Park is a key issue for the rural economy and affects households, local business and tourist development. Many rural communities have a totally inadequate broadband provision. It is unfortunate that the roll out of next generation broadband (under the Step Change program) is, to date, only planned for the urban areas and larger communities, most of whom already have an adequate broadband provision. To what extent the program will benefit the smaller rural communities remains unclear at this time.

I accept the National Park does not have the budget to support broadband developments. However it must lobby hard for a much greater emphasis to be placed on rural communities in the Step Change program, where the need for improved broadband is greatest. Until now the National Park has done nothing active to promote broadband developments, other than noting its importance in a number of reports! I would also like to the National Park provide free WiFi hot spots in key locations across the Park for the benefit of tourists.

Mobile phone reception is poor or non-existent in many areas of the Park. The Park should encourage operators to install more shared provider masts across the park and support the government initiative to allow roaming where only one provider is available.

The vast majority of visitors to the Aberfoyle area travel by car. Although there is a reasonable bus service to/from Stirling, the service to/from Glasgow is poor with most day time services requiring a change in Balfron with waiting times of up to 40 minutes. Passenger numbers have been declining on this route since the loss of the direct service provided by Aberfoyle Coaches. The National Park should work with operators to improve connection times by minor adjustments to the timetable (at negligible cost), and then promote the service as an alternative to car travel. This together with other initiatives (DRT, Loch Katrine/Loch Lomond water connections) would make travel to and through the Park by public transport a much more viable option. The loss of many Sunday services across the Park is a disappointment. Consideration should be given to securing funding for summer tourist services on key routes across the Park (including Glasgow/Aberfoyle services).
### Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.12

#### Options & Solutions for Infrastructure & Services Question 4: Do you agree with the options listed above? Any further suggestions?

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<tbody>
<tr>
<td>00074</td>
<td>Mountaineering Council of Scotland</td>
<td>Other Public Organisation</td>
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<tr>
<td><strong>Verbatim Comment:</strong></td>
<td>MCoFs Supports The Proposed Intention That Housing And Infrastructure Development Should Mainly Be Located In Or Adjacent To Existing Settlements. If Done Well, This Will Improve The Attractiveness Of The Built Environment And The Viability Of The Park’s Small Towns And Villages.</td>
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<tr>
<td>00113</td>
<td>Luss Estates Company</td>
<td>Private Business</td>
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<tr>
<td><strong>Verbatim Comment:</strong></td>
<td>Luss Estates agrees in principle with the proposed preferred option, but would caution regarding point 4. If the planning contribution is too great, then development will be stifled. If there is a doubling up of this contribution with that of affordable housing, then almost certainly little new development will occur.</td>
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<td>Customer Name:</td>
<td>David Morris</td>
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Verbatim Comment:
I agree with your preferred option
Infrastructure and Services Under point 3; when identifying priorities for infrastructure for developer contributions, consideration should be given to paragraph 139 of Circular 6/2013 (Development Planning), for example, by identifying such infrastructure in the Plan.

In addition, for point 4 of the Preferred Option, we would note that if such planning contributions are to be sought through planning obligations, it shall be important that any policy is consistent with Circular 3/2012. Finally, explanation could have been given in relation to why there are no Alternative Options presented for this main issue.
Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.12

Options & Solutions for Infrastructure & Services Question 4: Do you agree with the options listed above? Any further suggestions?

Customer Reference: 00212
Customer Name: Stirling Council
(If applicable)
Comment Reference: LDP01/MIR/CONS/00212/1/007
Comment Method: EMAIL
Customer Type: Local Government

Verbatim Comment:
Infrastructure and Services Q4 Do you agree with the options listed?
The preferred option is supported. The focus on new development in and around settlements is a sustainable approach that Stirling supports.
4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.12

Options & Solutions for Infrastructure & Services Question 4: Do you agree with the options listed above? Any further suggestions?

Customer Reference: 00213  
Customer Name:  
Comment Reference: LDP01/MIR/CONS/00213/1/004  
Comment Method: EMAIL  
Customer Type: Local Government

Q4 Do you agree with the options listed? Any further suggestions?
The options listed are supported.

With particular reference to the statements:

"Identify priorities for infrastructure or service improvements that new development may be required to contribute to each settlement in the Local Development Plan" and Secure greater planning contributions for infrastructure, service provision, maintenance or improvements

Again, aligning the activities above with transport objectives such as ensuring a realistic choice of access to new development as well as existing infrastructure plans for the area (e.g. LTSS) will help both strengthen the case for contributions towards relevant transport infrastructure as well as helping assist with co-ordinated delivery.

For example, Stirling’s ‘Towns, Villages and Rural Area Transport Plan’ proposes packages of measures for each settlement (and relevant transport corridors). The LDP can inform these packages and vice versa. These packages can help inform any priorities for infrastructure or service improvement that new development may be required to contribute to. Equally the contributions process could make reference to relevant adopted infrastructure plans (particularly as an additional evidence base).

All the transport authorities which cover the national park will make recommendations on the transport and access requirements of developments. Each will also be doing this in their own Council’s local planning authority area, and we assume all would prefer to ensure the greatest level of consistency between the advice they provide within and out with the park. Likewise the national park Planning Authority would prefer consistency both in terms of the policy advice they provide and receive. It is suggested that the LLTNPA and the transport authorities work together on developing the policy guidance to be provided in and with the LDP to help develop as consistent approach as possible.

Within Stirling Council’s LDP, and supported by the Supplementary Guidance Note ‘Ensuring a realistic choice of access to new development’, the Council seeks:

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
To ensure that there is a realistic choice of access via walking, cycling, public transport and motor vehicles to new development. (It may not be possible to support access by all modes in rural locations, however, this then emphasises the need to provide a choice by supporting access by those modes which are realistic)

To seek contributions to measures which help address the travel demands generated by the new development.

It is perhaps worth noting that it is unlikely that development outside settlements would be served by bus. Most travel demands are therefore likely to be met by car. However, the following issues still need to be taken into account when considering development outside settlements in the rural area:

- Providing safe access to local facilities and public transport by walking and cycling
- Ensuring the safety of the local road network (which was never designed for the speeds and volumes which are now experienced)
- Supporting DRT or community transport services or similar

It would be useful to understand if all the transport authorities have similar objectives, and if we can develop an approach within the LDP which supports these objectives.
### Options & Solutions for Infrastructure & Services Question 4: Do you agree with the options listed above? Any further suggestions?

**Infrastructure and Services:** Issues indicated include poor local and trunk roads and we would welcome input to how this is referred to within the Proposed Plan and how the on-going strategic transport works are highlighted. We support the Preferred Option to focus new development in or adjacent to existing settlements and identify priorities for infrastructure or service improvements that new development may be required to contribute to. Within the Proposed Plan it should be made clear that Transport Scotland will require to be consulted on any development likely to impact on the strategic transport network.
Options & Solutions for Infrastructure & Services Question 4: Do you agree with the options listed above? Any further suggestions?

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<td>00144</td>
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<td>Customer Name</td>
<td>Loch Lomond Steamship</td>
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<td>Organisation</td>
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<td>EMAIL</td>
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<tr>
<td>Customer Type</td>
<td>Private Business</td>
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ADDITIONAL OBSERVATIONS -
No mention of Ardlui, the village at the head of the loch. Should Maid of the Loch become operational again, Ardlui could be a suitable destination for cruises (the pier there was closed in 1963 and subsequently demolished)

In conclusion, our opinion is that the restoration of Maid of the Loch to operational condition and the creation of a visitor learning experience at Balloch Pier also meets all four of the National Park's main aims as set out in section 1.4 on page 10. The report makes several mentions of improving - and increasing - the water based transport on Loch Lomond, better water access, making it easier to move around, etc., but none of the six piers on the loch are mentioned. With Maid of the Loch there is a positive solution to most of these issues, yet the Maid is not referred to at all. As an historic vessel with the infrastructure facilities - including the Grade A Balloch Steam Slipway - we feel this should be accorded positive support in this document.
Q1, Q2, and Q3: Focusing new development in, or immediately adjacent to existing settlements provides opportunities to make best use of existing public services. Priorities for further improvements should be identified in consultation with public services providers such as the Council, recognising that additional contributions may also be required from developers.
At the recent meeting of Port of Menteith Community Council, members considered the Live Park: Main Issues Report. Generally in favour of the proposals contained within the consultation document, the section on housing relating to the provision of smaller or affordable housing on small developments was particularly welcomed.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivelpark.com
Housing Question 1: How much new housing is required?

"Affordable housing. Your general policy on affordable housing seems to be slightly at odds with the Scottish government policy in that your requirement for a 50% provision within any development is much more stringent than the 25% required by S.G.

Would you not consider that this factor, amongst others, may have been significantly responsible for the under development within the national park. On the one hand you say that there is insufficient supply of housing for the ageing population wishing to downsize but you block the provision of such housing as these people would wish for, i.e. limiting that provision to affordable housing."
### Housing Question 1: How much new housing is required?

None, there is already stagnation in terms of housing sales in G63.
The only way to deliver greater housing development in the National Park is by relaxing planning policies in tandem with a reduction in the condition put on approvals, such as section 75's and the proportion of affordable housing provision required.

A significant increase in housing development is required, otherwise the small communities in the Park are going to age and die.

Luss Estate believe that very few additional houses are required with 1 or 2 bedrooms. What is needed is 3 and 4 bedroom houses to attract families, not more houses for the ageing population. This is supported by the Strategic Development Framework.
Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.13

Housing Question 1: How much new housing is required?

Customer Reference: 00169
Customer Name: David Morris
Comment Reference: LDP01/MIR/CONS/00169/1/006

Organisation: (If applicable)
Comment Method: OLDP
Customer Type: Individual Resident

Verbatim Comment:
I support Alternative Option 1.

There seems to be little justification for continuing to plan 75 new homes per year.
4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.13

Housing Question 1: How much new housing is required?

The Housing Section of the Main Issues Report (MIR) is informed by the Background Paper for Population and Housing. The Background Paper confirms that the Local Development Plan (LDP) is likely to be adopted in 2016 and must provide sufficient land for housing to 2026. The National Park Authority (NPA) aims to sustain the population within the National Park (NP). This is set out in Policy RD1 of the National Park Partnership Plan 2012-2017.

The MIR presents three options in respect of housing land supply targets:

- **Preferred Option**: 75 homes per annum
- **Alternative Option 1**: 50-60 homes per annum
- **Alternative Option 2**: significant reduction (35 per annum)

In accordance with the requirements of Scottish Planning Policy (SPP) (paragraphs 113-115), the LDP housing land supply target should be based on a robust HNDA. The NPA is not a housing authority and works in partnership with Stirling, Argyll & Bute, West Dunbartonshire and Perth and Kinross Councils. The Background Paper outlines the strategy adopted by the NPA in respect of identifying housing need ...NP falls mostly within the Stirling and A&B Local Authority areas it is these HNDAs that are of most relevance. Both these authorities have robust and credible HNDA’s that were signed off in 2011 (paragraph 26).

The HNDAs confirm a high level of need within the National Park. In addition to the high level of need within the NP, it is also reported that 7 out of 10 house buyers are from out with the NP. This confirms a high level of migration into the NP. In assessing the housing land supply target, the NPA has also considered past housing trends over the period 2008-13. This is a period which coincides with a global economic downturn. It is therefore not surprising that house building activity in this period was low.

NPA’s approach
Taking account of past building rates and the desirability to sustain population levels, the NPA has selected a housing land supply target of 75 homes per annum. This is a continuation of the housing land supply target adopted in the current Local Plan. The NPA calculate the housing land requirement as follows (source Background Paper for Population and Housing):

Housing Supply Target: 75 homes per annum (from previous LP) x 12 years = 900 homes
Minus Established supply (Housing Background Paper) = 383 homes
Minus Windfall Allowance (30 per annum) = 360 homes
Equals Allocations required = 157 homes (rounded to 160)

The established supply includes 38 homes from constrained sites. By including these constrained sites, the NPA’s approach is therefore not in accord with SPP and PAN 2/2010. SPP (paragraph 121) confirms that LDP’s should allocate a range of sites which are effective or expected to become effective within the plan period to meet the housing land requirement in full. They should provide a minimum of 5 years effective land supply at all times. PAN 2/2010 (paragraph 59) confirms that planning authorities should take action to ensure that constraints are removed, particularly where the site is needed to contribute to the housing land supply within the plan period. Where constraints cannot be overcome, PAN 2/2010 confirms that sites should be removed from the housing land supply. There is no analysis presented by the NPA to confirm that constrained sites will contribute to the housing land supply within the Plan period. Further work is necessary to confirm the effective housing land supply.

Scottish Government approach

SPP states that - National Park authorities should aim to meet the housing land requirement in full in their area. However, they are not required to do so, and they should liaise closely with neighbouring planning authorities to ensure that any remaining part of the housing land requirement for the National Parks is met in immediately adjoining housing market areas, and that a 5-year supply of effective land is maintained (paragraph 121).

SPP (paragraph 116) requires a 10%-20% generosity allowance as part of the housing land supply target. It is noted that the NPA proposes a housing land supply target without a generosity allowance.

At this time, the proposed housing land requirement of 750 homes does not comply with SPP. A generosity allowance of a further 75 to 150 homes is required. As a consequence, the housing land requirement will range between 825 homes and 900 homes.

The proposed housing land requirement of 750 homes over the 10 year LDP period and the proposed allocations of only 160 homes are not in accord with the requirements of SPP.

In the National Parks, local development plans should draw on the evidence provided by the HNDAs of the constituent housing authorities.

The NPA includes 383 homes from the Established Supply. In order to comply with the requirements of SPP, all of these homes must become effective within the plan period. The latest Housing Land Audit (2013) confirms that there are only 196 homes in the effective housing land supply.
It is apparent from that revisions are required in order for the Proposed LDP to comply with the requirements of SPP.

The housing land allocations for the Proposed LDP should be revised as follows:

- **Housing Supply Target** = 75 homes per annum x 12 years = 900 homes
- **Plus minimum 10% generosity in accord with SPP** = 990 homes
- **Minus Effective Supply** = 196 homes
- **Minus Windfall (12 x 30)** = 360 homes
- **Equals Minimum Allocations needed** = 434 homes

**Recommendation**

The Proposed LDP needs to accord with Scottish Government requirements as set out in SPP. In order to meet the NPA’s objective of sustaining population levels, and taking account of historic completion levels and existing levels of demand, the only reasonable option that can be adopted from those presented is the Preferred Option.

However, in order to comply with the requirements of SPP in order to allocate a generous supply of land the NPA must include a generosity allowance of between 10% and 20% required by the Scottish Government in addition to the housing land supply target.

In accord with the calculation above, and the requirements of Scottish Planning Policy, the LDP will have to allocate circa 434 homes which should be capable of becoming effective within the 12 year Plan period to 2026. This is 274 more homes than the MIR indicates will be needed. The MIR indicates that the LDP will only allocate 38% of the required number of homes.

**Comments:**

The MIR highlights the key issues about Callander which include restricted capacity in nursery, schools and roads network – (A81/A84 junction longer term), and flood risk from small watercourses.

The need to ensure a future supply of effective development land is also highlighted as a key issue.

The 2011 Charrette identified a preference to focus new development to the south of Callander, as a series of development phases.

The MIR identifies **Option 1 - Preferred**: Consolidate as the NPA’s Preferred Option for the short term. Option 1 seeks to:

- Support development on gap sites (H9, H12, H13) within settlement boundary and continue Callander East Rural Activity Area.
- Change H10 to be for retail, to supermarket
- Reduce area of ED3 to follow existing developed area.
Main Issues Report Our Live Park Comments Received

- Focus on town centre regeneration including a change of use for station car park provided there is an agreed revised approach to car parking - amend existing allocation ST10
- Identify additional development land at Callander south (MIR 37a) for 60 new homes, new hotel, economic development and community uses

Option 1b - Alternative includes land adjacent to the River Teith (MIR 37b) that is in addition to the above Preferred Option. Option 1b provides the only realistic solution to the issues identified in the MIR. The landowner has set out a comprehensive proposal for the land holding as a future tourism destination, building on the existing assets of the site and the wider location, together with an expansion of the town.

The NPA has highlighted a need to ensure a future supply of effective housing land in Callander. In addition, the landowner has analysed the NPA’s proposed housing land supply target and has identified a need for the Local Development Plan to identify land for approximately 300 more homes than it is currently proposing. The landowner made a comprehensive representation in support of its landholding in Callander, including a Development Concept Report at the Call for Sites stage.
4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.13

Housing Question 1: How much new housing is required?

Customer Reference: 00185
Customer Name: 
Comment Reference: LDP01/MIR/CONS/00185/1/008
Organisation: Scottish Government
Comment Method: EMAIL
Customer Type: National Government

Verbatim Comment:

Policy Areas
Housing Needs
SPP 2014 states that NPA’s should utilise the HNDAs of the constituent housing authorities (in this case Stirling, Argyll & Bute, West Dunbartonshire and Perth & Kinross).
We are content that the NPA meets this requirement, in that the MIR is informed by the constituent HNDAs where available. We are content that there is a clear link demonstrated between the Council’s HNDAs and the Housing Supply Targets for the area, well supported by evidence. Please note the revised HNDA guidance is now published.
The current Local Plan set an all tenure target of 75 houses per year. The MIR questions whether this target is still achievable over the LDP period and sets out 3 options for consideration:

Continue to plan for ambitious growth at 75 units per year the Preferred Option;
Plan for modest growth at 50/60 units per year;
A lower target of 35 units per year.

We note that the Preferred Option is to continue to plan for growth at 75 units per year, which creates a shortfall in Land Supply of around 160 units. We consider that the approach described in the MIR is sensible and pragmatic, with the housing supply target being reasonable and supported by evidence. We would recommend that full consideration be given to the status and likely deliverability within the plan period of the allocated sites which remain undeveloped.

With regard to Land Supply, Tables 8 and 9 in the Background Paper indicate that there is sufficient land to meet the 160 unit shortfall based on sites for 154 units being released. However, windfall sites account for 360 of the 900 unit total (40%). SPP 2014, paragraph 117, sets out expectations around the contribution windfall sites can make to housing land requirements. In this regard, consideration should be given to striking more of a balance between sites allocated in the plan and potential wind fall sites in order to meet the housing land requirement.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
In terms of affordable housing provision, we note that the MIR identifies options for changing the existing levels of contributions. The Preferred Option is to reduce the affordable housing requirement in Settlements to 25% on sites of 4 or more units except in Loch Lomondside where a 50% level would apply. The Preferred Option also proposes that for sites of 3 or less units there will be a requirement for either an affordable housing unit or a smaller house to be built or that a financial contribution be made to fund affordable housing elsewhere.

SPP 2014 requires that the level of affordable housing required as a contribution within a market site should generally be no more than 25% of the total number of houses. Consideration should also be given to the nature of the affordable housing required and the extent to which this can be met by proposals capable of development with little or no public subsidy. Discussion within the MIR (page 58) on focusing on meeting need within the park and seeking a greater diversity in house types and size, with more smaller-sized homes is welcomed.

In terms of seeking affordable housing contributions from sites of 3 or less units, we would note that SPP 2014 (paragraph 129) states that planning authorities should consider the level of affordable housing contribution which is likely to be deliverable in the current economic climate, as part of a viable housing development. Given the acknowledged existing difficulties in delivering housing within the park, consideration should be had to the deliverability of this proposed policy change and the potential effects on viability of such small scale sites. Where Supplementary Guidance is to be used to provide further information or detail, this should be on the basis that the Plan has established the policy principle or proposal and it expressly identifies in a statement the matters to be dealt with in supplementary guidance, for example the levels of contribution to be sought, the delivery of affordable housing, the measures to achieve the retention of affordable housing and other matters as set out in SPP 2014.

The needs of Gypsies, Travellers and Travelling Show People should be considered and reflected in the Proposed Plan, as required by SPP 2014.

SPP 2014 requires that LDP’s allocate appropriate sites to support the creation of sustainable mixed communities. We found that this comes across well in the MIR.

Finally, it will be important for the LDP to take account of the approach to housing development in the countryside as set out in SPP 2014, which states that new housing outwith settlements may be appropriate avoiding use of occupancy restrictions.
4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.13

**Housing Question 1: How much new housing is required?**

**Customer Reference:** 00193  
**Customer Name:** Gavin MacLellan  
**Comment Reference:** LDP01/MIR/CONS/00193/1/010  
**Comment Method:** EMAIL  
**Customer Type:** Individual Resident

Verbatim Comment:
Development Demand - if the population is decreasing, where is the evidence of an increased demand for housing. A reducing population needs less housing. Question: Should the root of the demographic change not be understood and if needed fixed first? Is the evidence for Affordable Housing and other housing evident in a falling population?
Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.13

**Housing Question 1: How much new housing is required?**

Customer Reference: 00212

Organisation: Stirling Council

Customer Name: (If applicable)

Comment Reference: LDP01/MIR/CONS/00212/1/019

Comment Method: EMAIL

Customer Type: Local Government

Verbatim Comment:

SPP requires the LDP to give an indication of the possible scale and location of housing land up to year 20, but it is not clear how these major proposals for Callander relate to the targets for affordable and market housing put forward in the MIR. For example, there is no table setting out the total level of housing to be apportioned to each settlement once the effect of the proposed alternatives (higher levels of growth) set out in the MIR itself are included. Tables 8 and 9 of the Population and Housing Background Report only deal with the Preferred Approach (75 units per annum) and lower levels of growth.
Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.13

Housing Question 1: How much new housing is required?

The Stirling HNDA (2011) identifies housing need and demand arising within the Park. Further analysis undertaken by the Park authority confirms that the need for affordable housing remains and there is a continuing demand for market housing, along with recognised changes in the population demographics. Given this context, the preferred option to continue to plan for 75 units per annum appears reasonable. The requirement to provide a ‘generous supply’ and the draft SPPs suggestion that this could be an additional 10% to 20% ‘flexibility’ would suggest that the preferred option is more likely to comply with national policy than alternative options 1 or 2.
Housing Question 1: How much new housing is required?

We note the three options and agree with the preferred (highest growth) option one of continuing to plan to meet an annual target 75 new homes, of all types, across the National Park. This would give an overall target of 750 new homes over the period up to 2026. This is not a large number but in light of the challenges in developing new homes locally is probably a realistic target.

We are not sure however that this means that there is only a need for additional allocated land for 160 dwellings. Part of the rationale given for this is that there are already around 120 units of undeveloped allocated land within the existing Local Plan (with the balance of supply expected to be delivered through windfall sites).

We estimate that around half of these 120 are on sites that do not appear likely to be developed in the foreseeable future and of the remaining 58 or so most, 36, are on the longstanding Gartness Road site which now has Planning Consent but an unknown timescale for delivery.

Many of these allocated but undeveloped sites will probably not move forward without a significant upturn in the housing market, and there is no certainty as to when or even if this will occur.

We also agree that, within the Stirling area, a focus on Callander is appropriate – particularly in light of the Callander Charette outcome findings.
Homes for Scotland supports retaining the existing housing target of 75 p.a.

The document recognises that the park area is an attractive one in which to live as well as for visitors and tourism/recreation. It recognises that development is needed to support communities, visitors and the local economy while protecting and conserving natural and heritage assets. It therefore acknowledges that land for new development is needed to 2026, and that some of the policies in the existing local plan directing and controlling development may need to be reconsidered.

To that extent, the MIR starts from a position of apparently recognising the need for some change and some development. It is recognised that the population of the park area is falling and aging. It is recognised that local business growth has been limited. It is recognised that house prices are amongst the most expensive in Scotland, with the majority of buyers being external. There is an acknowledged lack of supply of smaller houses at the lower end of the market and of affordable housing. Little new-build has occurred in either market or affordable sectors. Most private new-build has been single houses.

The MIR notes that the majority of sites allocated for development in the last plan remain undeveloped. In respect of housing sites, 25 out of 29 sites are undeveloped. The implication in the document is that the recession is a main factor, but it is then recognised on page 21 that the existing housing policies should be reviewed. For instance, if 25 out of 29 sites are undeveloped, are they the right sites? Are they unduly constrained by policy burdens? It is acknowledged that the current scale of housing requirement - c. 75 p.a. - remains valid. It is also acknowledged that there should be a generous supply of land and that each significant settlement should have identified housing sites. But there is no analysis of the reasons for lack of progress.

Homes for Scotland members have suggested that the key issue is the unrealistic affordable housing policy expectation of between 25 and 50% (100% in some instances). High and unrealistic expectations on design and provision of infrastructure are also issues. These render many developments unviable. Indeed, prior to a developer becoming involved, the likely impact on land values will deter many landowners from releasing land at all.

Much of the land allocated for housing is of poor quality, in less marketable areas, and seems focussed on regeneration of the settlements fringing the park, as opposed to...
trying to serve the demand for good-quality living environments in the park.

It is suggested that the park authority needs to fundamentally-rethink the locations of proposed housing land, aligning land allocations with market demand. It also needs to reduce the policy/cost burdens on development, in particular the unrealistic expectations for affordable housing.

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.13

Housing Question 1: How much new housing is required?

Customer Reference: 00150
Organisation: Argyll and Bute Council
Customer Name:
(If applicable)
Comment Reference: LDP01/MIR/CONS/00150/1/007
Comment Method: EMAIL
Customer Type: Local Government

Verbatim Comment:
Support preferred option of continuing provision of 75 new houses per annum across the Park area, as this may help reverse population decline, and enable the park to help deliver a share of the approved HNDA requirements.
Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.13

Housing Question 1: How much new housing is required?

Customer Reference: 00168
Customer Name: A       Peebles
Comment Reference: LDP01/MIR/CONS/00168/1/009
Comment Method: OLDP

Verbatim Comment:

P23 6.8 It appears that the Nat Park has failed to allow family homes to be built for some years preferring only to allow tourism properties.

The NP should be able to provide the evidence to support figures for that and discover why less than 50% of private housing given planning permission is being built.
Main Issues Report Our Live Park Comments Received

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Housing Question 1: How much new housing is required?

Customer Reference: 0020  
Customer Name: Mactaggart And Mickel  
Organisation: MacTaggart and Mickel  
Comment Reference: LDP01/MIR/CONS/00200/1/003  
Comment Method: EMAIL  
Customer Type: Private Business

Verbatim Comment:
The current local plan sets a target of 75 new homes a year. In the years 2008 – 2013 an average of 48 houses have received planning permission and 23 houses have been built each year. We note the national park aims to identify a generous supply of land to create a range of opportunities to ensure that housing market recovery is not held back by a lack of land.

Housing Q.1

How much housing is required? What option do you support and why?

As considered above we note the national park propose to continue the target of 75 units per annum for the local development plan. We note this has been established from reviewing HNDA information from the four local authorities in the national park area.

With regards to p21 in the background paper for population and housing - version 1, March 2014 we note that windfall development has outperformed land identified on local plan sites between 2008 and 2013. This will undoubtedly be related to the downturn in the economy in this time and the unique nature of the national park in terms of single house developments, etc. However, this is also a clear indication that not enough effective land is being allocated in the plan.

The mir states on p61 that more flexibility is required in the national park and in this regards affordable housing targets are not being achieved. Whilst we note this is related to the present affordable housing policies in part this is also linked to a lack of effective supply to meet the required housing shortfalls.

Furthermore, the new SPP policy document (June 2014) now advises that an overall housing supply target should be increased by a margin of 10% to 20% to establish the housing land requirement. We are assuming, given the MIR was published prior to the SPP being approved, that the 75 per annum requirement does not take this into account.
In our view the national park should consider a new alternative option 3 - aim for a higher level of growth, in the region of 90 units per annum being required. This would reflect an increase of 20% to allow for a generous supply, promote sustainable growth in the national park, increase affordable housing development and reduce as much reliance on windfall development.

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.14

Options & Solutions for Housing Question 1: What option do you support?, Why?

Customer Reference: 00092  
Customer Name: 
Organisation: West Dunbartonshire Council
Comment Reference: LDP01/MIR/CONS/00092/1/004  
Comment Method: OLDP  
Customer Type: Local Government

Verbatim Comment:
On this matter, the proposed Council response supports that the National Park Authority continues to plan on the basis of 75 completions per year. This does not significantly affect the amount of land identified for housing in Balloch or Gartocharn, and ensures a generous supply of land for housing.
Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.14

Options & Solutions for Housing Question 1: What option do you support?, Why?

Customer Reference: 00106
Customer Name: Anne Lee
Comment Reference: LDP01/MIR/CONS/00106/1/008
Comment Method: OLDP
Customer Type: Individual Resident

Verbatim Comment:
I agree with Alternative Option 1 of slightly reducing the target. I agree with the Park's view that there needs to be greater diversity in the size and types of new housing built, including an increase in affordable housing options, more smaller sized homes in comparison to larger ones and housing that meets the needs of increasing numbers of smaller and/or older households. However since a number of sites have been identified but not yet built on it does not seem necessary to go through the difficult process of identifying sites that are likely to be surplus to what developers are actually prepared to build on. Also this carries the risk of developers opting for sites that are not the most preferred Park and local community sites.
The preferred target of 75 new properties per year is unrealistic in the current financial climate and predicted population reduction. Option 1 of 50-60 houses is still very ambitious, I would prefer to see a lower target of 30 – 40 houses which better reflects the level of building over the last six years whilst allowing for modest growth. The Local Development Plan should ensure all new properties meet the highest standards of low energy design through low carbon generation and increased insulation. Consideration should be given to supporting improvements to the existing housing stock, both private and Council/Housing Association owned, through further grants for energy efficiency and repairs. This would follow on from the success of earlier Park initiatives such as the Community Futures Goes Green project and Built Heritage Repair grant.
Main Issues Report Our Live Park Comments Received

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Options & Solutions for Housing Question 1: What option do you support?, Why?

Customer Reference: 00081
Customer Name: (If applicable)
Comment Reference: LDP01/MIR/CONS/00081/8/001
Comment Method: OLDP
Customer Type: Individual Resident

Verbatim Comment:
Option 2, there is already a plentiful supply of houses in the park, supply outstrips demand and as far as I can remember from my Economics degree that means we don’t need any more.
Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.14

Options & Solutions for Housing Question 1: What option do you support?, Why?

Customer Reference: 00113
Customer Name: Luss Estates Company
Comment Reference: LDP01/MIR/CONS/00113/1/019
Comment Method: OLDP
Customer Type: Private Business

Verbatim Comment:
Luss Estates supports the preferred option. Only a significant increase in the family rural population, and thus the development of new family housing, will reverse the decline of these communities.

Family houses are required, not smaller 1 and 2 bedrooms houses. Luss Estates fully understands that the majority of these family houses should smaller rather than larger in footprint.
I support Alternative Option 1.

Alternative Option 1

This option would be more in line with the identified trend and hence would be closer to the principle of conservation. There is little need to promote more housing in the Park if there is no demand. For example there is little point in Stirling Council settling people in Drymen if the work is located in Stirling City.
### Customer Reference: 00168

<table>
<thead>
<tr>
<th>Customer Name:</th>
<th>Peebles</th>
<th>Organisation:</th>
<th>OLDP</th>
</tr>
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</table>

**Verbatim Comment:**

I support option 2. Unless you do something about the support infrastructure of roads/medical facilities/public transport/schools and proper employment opportunities there is nothing to encourage people to come here to live except the elderly or retired for whom there is little to offer.

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### Customer Reference: 00172

<table>
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<tr>
<th>Customer Name:</th>
<th>Greig Morris</th>
<th>Organisation:</th>
<th>OLDP</th>
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</table>

**Verbatim Comment:**

I support Alternative Option 1
Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.15

**Housing Question 2: How can we best deliver housing in the National Park?**

Customer Reference: 00045  
Organisation: Kilmaronock Community Council  
Customer Name:  
(If applicable) Council  
Comment Reference: LDP01/MIR/CONS/00045/1/002  
Comment Method: EMAIL  
Customer Type: Local Public Body

**Verbatim Comment:**

Housing in the Settlements, page 63. KCC agrees with the preferred option, but suggests that the financial contribution should be not less than 5% of the build cost.
Alternative 2 would seem more appropriate.

(61/62) We also believe the Park should be more willing to compromise on their affordable housing requirements per building site with an overall target for an area dependent on local requirements. The questions raised on page 62 should be flexible and purely dependent on site suitability and local demand.

Preferred Option. (63/64) We disagree with both the ‘preferred’ and ‘alternative option 1’. The Park should have a flexible approach as stated above. Inflexibility is likely to harm the Park and move development outside the NP boundaries. We would urge the Park to have a selective & flexible policy that can be tailored to suit each individual site as well as local requirements. Requiring smaller houses and/or financial contributions can and do result in developers looking ‘outside’ of the Park for their future developments.
Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.15

Housing Question 2: How can we best deliver housing in the National Park?

Customer Reference: 00102
Customer Name: M Luti
Comment Reference: LDP01/MIR/CONS/00102/1/002
Comment Method: OLDP

Verbatim Comment:
The draft plan refers to affordable housing being produced on the basis of split between 70% social/affordable housing and 30% intermediate/shared ownership. Our client strongly endorses the need for a varied housing market and to provide a range of affordable housing. However, the policy is aspirational and needs to be more realistic. We question whether grant funding will be available to support the 70% social/affordable element and we believe that a 50:50 split would be more realistic.

We also believe that deliverability is crucial. There needs to be a statement that affordable housing thresholds will be considered with reference to site viability. The 25% threshold is too high and will only be achievable if it is linked to the 50:50 split between tenure types we have outlined above.

Please do not hesitate to contact me if you wish to discuss this matter.
<table>
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<th>Chapter Commented on:</th>
<th>4 Identifying the Main Issues - what needs major change and what are the options? &gt;&gt; 4.3 Main issues, potential options and solutions &gt;&gt; 4.3.15</th>
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<td>Customer Name:</td>
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<td>Comment Reference:</td>
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<td>Customer Type:</td>
<td>Individual Resident</td>
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**Housing Question 2: How can we best deliver housing in the National Park?**

Verbatim Comment:
Housing Qu 2 - See answer to question 3
Verbatim Comment:
As mentioned, it is unfortunate to see working age and younger families are predicted to decline while the retired population increases. I hope to see schemes to encourage families to live in the park. Ensuring new build housing is encouraged for first time buyers such as myself and not simply small expensive schemes affordable to retired individuals. Working groups, panels or schemes to appreciate and build cohesion with the future of the park through younger working age people would be welcomed and encouraged. While a decreasing minority we would be the ones with the inspiration for the future, possibly willing to take on small business and would be the longer term population of the park if encouraged to stay.

Overall I am encouraged by the proposal, for some of the home building I only wish it was today and not a hope for the future but I am encouraged that the park is a place for residence for a long time to come.
The area is also seen as a good one for commuters to the large conurbations of Greater Glasgow, Stirling and other places in the Central Belt. Similarly, the area is popular with the recently and active retired who contribute significantly to the social, economic and environmental well-being of the area and help to sustain the infrastructure of the area and although this tends to keep house prices higher than the Scotland average it does help to ensure that most houses are primary residences. The overall tone of this report in the context of Strathard does not reflect these successes and does not appear to seek to build on them. The Local Development Plan should identify ways of welcoming and supporting these categories of residents. Propose: Actively support those who commute and the recently retired and collaborate with partner organisations to enhance services and infrastructure.
Housing Question 2: How can we best deliver housing in the National Park?

With particular regard to Drymen, you will be aware that a developer received planning permission for residential development on the site behind the main Drymen car park. I understand that the developer has no plan to develop this site in the foreseeable future.

It would seem to me that rather than seek other sites in Drymen; you should be seeking to use (presumably through Stirling Council) the compulsory purchase legislation to make that site available for affordable housing.

You should find ways of facilitating that process rather than by default accept this constraint.
### Housing Question 2: How can we best deliver housing in the National Park?

#### Chapter Commented on:

4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.15

#### Comment Reference:

LDP01/MIR/CONS/00173/1/006

#### Customer Reference:

00173

#### Customer Name:

Isabella Morris

#### Organisation:

(If applicable)

#### Comment Method:

OLDP

#### Customer Type:

Individual Resident

#### Verbatim Comment:

Rather than seek other sites in Drymen, you should use (presumably through Stirling Council) the compulsory purchase legislation to make the site behind the main Drymen car park available for affordable housing.
4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.15

**Housing Question 2: How can we best deliver housing in the National Park?**

Customer Reference: 00181

Customer Name: Maja McTavish

Comment Reference: LDP01/MIR/CONS/00181/1/005

Organisation:

(If applicable)

Comment Method: OLDP

Customer Type: Individual Resident

**Verbatim Comment:**

I am in support of additional local housing. I grew up in Drymen and returned here 10 years ago with my partner and I now have a 3 year old son. My family live here as did my grandparents and theirs. I have been on the housing waiting list with Stirling Council and Rural Housing for over 10 years!!!!

So I am in support of new housing with LOCAL people receiving priority. I work in social care so I am fully sympathetic to the different issues which affect social housing however I feel that any new housing should firstly be offered to local people. Although in support of new housing for local needs I also feel it is important to retain the character and identity of the community whilst ensuring that we are meeting visitor/tourism needs. The key is to find the balance and ensure that the area is not over-developed as this would ruin the village completely.
Housing Question 2: How can we best deliver housing in the National Park?

Should the affordable housing requirements be reduced on housing sites of 4 or more units?

Preferred option we agree with removing the current local housing needs policy for Loch Lomondside.

With regards to affordable housing provision delivery is clearly key in this sector. It has been shown elsewhere in the country that anything above 25% affordable housing is very difficult to achieve. This has been further affected by recent budget cuts to grant funding on affordable units. Planning authorities need to be proactive to the delivery of affordable housing and do all they can to ensure market housing can deliver an element of affordable units.

In this regard we would suggest that the national park promotes a new alternative option 3 all settlements in the national park should have a minimum 25% affordable housing requirement in line with National Policy and with reference to pan 2/2010 (with flexibility to amend this where abnormal development costs are demonstrated).
Main Issues Report Our Live Park Comments Received

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Housing Question 2: How can we best deliver housing in the National Park?

Customer Reference: 00219 Organisation: Buchanan Community Council
Customer Name: (If applicable)
Comment Reference: LDP01/MIR/CONS/00219/1/002 Comment Method: EMAIL Customer Type: Local Public Body

Verbatim Comment:
Response from Buchanan Community Council on Main Issues Report - In the first instance we oppose the suggestion to allow the sale of affordable housing after a 10 year period.

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.15

Housing Question 2: How can we best deliver housing in the National Park?

Customer Reference: 00088 Organisation: Callander Community Council
Customer Name: (If applicable)
Comment Reference: LDP01/MIR/CONS/00088/4/005 Comment Method: OLDL Customer Type: Local Public Body

Verbatim Comment:
Reduce the percentage of affordable housing to 25%, this will encourage developers to the sites and more affordable housing will be built.
4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.15

**Housing Question 2: How can we best deliver housing in the National Park?**

Customer Reference: 00150

Organisation: Argyll and Bute Council

Customer Name:

Comment Reference: LDP01/MIR/CONS/00150/1/008

Comment Method: EMAIL

Customer Type: Local Government

**Verbatim Comment:**
The Council has approved a more flexible approach to the delivery of affordable housing in the proposed Argyll and Bute local development plan. It recognises that the need for affordable housing provision can vary between and across housing market areas, and that the manner in which it is provided can vary across communities and may be considered on a site by site basis, with reference to the local housing strategy.

---

4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.15

**Housing Question 2: How can we best deliver housing in the National Park?**

Customer Reference: 00172

Organisation: Argyll and Bute Council

Customer Name: Greig Morris

Comment Reference: LDP01/MIR/CONS/00172/1/006

Comment Method: OLDP

Customer Type: Individual Resident

**Verbatim Comment:**
In reference to Drymen, the residential development site behind the main Drymen car park is now sitting undeveloped. Compulsory purchase of this should be sought rather than trying to seek other sites in Drymen.

*If you feel any information in this report is incorrect please contact us by email at hello@ourlivelpark.com*
Housing Question 2: How can we best deliver housing in the National Park?

We agree that a more flexible policy on the requirement for affordable housing may improve the prospects of some sites being brought forward for development.

We agree that the percentage affordability requirement on-sites of 4 units or more should be reduced. We also think that there is a strong case for securing a contribution towards affordable housing needs from sites of three homes or less - as these make up a large proportion of development in the Park.

We note the three options presented ("preferred option" and two alternatives). The "preferred option" is closest to what we feel to be appropriate. However, notwithstanding the recent Scottish Government SPP stipulation that affordability requirements should generally be no more than 25% we feel that reducing the requirement on sites of 4 units or above, across the National Park (excepting Loch Lomondside), to 25% would be going too far.

We note in particular that, in considering the Stirling Council LDP, Reporters recently decided that the affordability requirement for the rural parts of the Council area (out-with the Park) should be 33%. We feel that the levels of need and demand in some settlements within the Stirling part of the Park area (outwith Loch Lomondside) also justify a higher than 25% requirement. 33% would still represent a reduction and provide an added incentive to land-owners to bring forward sites for development.

Potential sites for development within the Park are often small and a higher (than 25%) affordability requirement is likely to somewhat increase the viability of incorporating on-site affordable homes within a mixed development.

We agree that the Loch Lomondside area is particularly pressured and that this justifies a 50% affordability requirement (but with flexibility to amend this where abnormal development costs are demonstrated).

It is not clear to us how the current Local Housing Needs Policy for Loch Lomondside operates in practice and we do not therefore have a view on whether it should be
discontinued.

We agree that for housing sites of up to 3 units that either an affordable or smaller house is built or that a financial contribution is made to help fund affordable housing provision on other local sites. Also that the level of contribution should reflect the affordability requirement prevailing in that area.

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.16

Options and Solutions for new housing in the settlements Question 3: What option do you support? Why?

Customer Reference: 00047
Customer Name: (If applicable)
Comment Reference: LDP01/MIR/CONS/00047/2/007
Comment Method: EMAIL
Customer Type: Local Public Body

Verbatim Comment:

66) We agree ‘alternative option 2’, no longer continuing with HOUS3 and instead focussing on identifying sites within settlements, or via amending settlement boundaries.
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Customer Reference: 00092
Customer Name: West Dunbartonshire Council
Comment Reference: LDP01/MIR/CONS/00092/1/005
Comment Method: OLDP
Customer Type: Local Government

Verbatim Comment:
The Council supports the preferred option and status quo of requiring a 25% affordable housing contribution from sites in Balloch and 50% from sites in Gartocharn.
Options and Solutions for new housing in the settlements Question 3: What option do you support? Why?

Customer Reference: 00106
Customer Name: Anne Lee
Comment Reference: LDP01/MIR/CONS/00106/1/010
Comment Method: OLDP

Verbatim Comment:
Housing Qu 3 - I do not agree with any of the options tabled. I agree with part (b) of the preferred option ie:

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 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. However I do not agree with part (a) ie a reduction in the affordable housing requirement as this carries a high risk of cutting across the Park's desire to try to secure a housing supply that better meets local needs, including smaller dwellings for the elderly.
Options and Solutions for new housing in the settlements Question 3: What option do you support? Why?

Customer Reference: 00113
Customer Name: Luss Estates Company

Verbatim Comment:
Luss Estates supports the preferred option, subject to three amendments.

1. 4 or more units - a 50% requirement for affordable housing will stop future development. This level of provision will make such developments commercially non-viable. We would support the same 25% element as elsewhere.

2. up to 3 units - Luss is a village constrained by the loch and the A82, and as such most developments in the area are going to fall into this category. Small sites lack economies of scale, and as such a punitive sanction on Loch Lomond side, where the financial contribution or provision of small scale houses is greater than elsewhere, will simply make development non-viable. We propose that the same rules apply across the Park.

3. It is difficult to support an option where the detail is missing; what would be the financial contribution required for smaller sites? In principle we support the idea, but cannot recommend it without the level being specified.
None of the above, the requirement for affordable housing should be an absolute minimum for all areas of the park, not just some areas you have selected on a whim. If there is no demand for big houses they won't be built, if there is a demand for smaller houses they will. That's how it works.

Support option 2.
Housing Q3 And Q4:- The Local Housing Strategy And Strategic Housing Investment Plan is used by the Council’s Housing Service to determine priorities for assisting provision of affordable housing, this relies on a planned approach for the provision of such housing. The use of windfall sites or the abandonment of the requirement of affordable housing to be available in perpetuity may affect the provision of public funding for affordable housing on such sites.
Options and Solutions for new housing in the settlements Question 3: What option do you support? Why?

Customer Reference: 00188

Organisation: Sportscotland

Comment Method: EMAIL

Customer Name:

Organisation:

(Lif applicable)

Comment Reference: LDP01/MIR/CONS/00188/1/003

Customer Type: Public Body

Verbatim Comment:

Comment 4: in relation to new development that is proposed to be progressed through the LDP, particularly new housing development, any masterplan process should encourage sport and physical recreation. New development will have implications for the demand for sports facilities and could potentially create the need for new ones. The local development plan process should assess these implications.

Paragraph 226 of SPP states that LDPS should provide for good quality, accessible facilities in sufficient quantity to satisfy current and likely future community demand. It will be important for new development to align with the guidance set out in designing streets, which identifies walking and cycling as a priority. New development should incorporate existing and provide for new walking and cycling infrastructure and should link to both functional and recreational networks, including to routes that may extend into the wider countryside.
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.16

Options and Solutions for new housing in the settlements Question 3: What option do you support? Why?

Customer Reference: 00200
Customer Name: MacTaggart and Mickel
Organisation: MacTaggart and Mickel
Comment Reference: LDP01/MIR/CONS/00200/1/002
Comment Method: EMAIL
Customer Type: Private Business

Verbatim Comment:
The landscape capacity assessment for Drymen and gartocharn feb 2010 (David Tyldesley and associates) considers the longer term option 2 on p 65. It states that development should not be allowed beyond the current extent of housing on Stirling Road, since the open grazed field immediately east (to the south of the football pitch) is considered a sensitive, undulating natural edge to the village which should remain undeveloped.

This report is now somewhat out dated given it actually promotes the football pitch and adjacent land to the north as a longer term option for housing development in Drymen. We note that this area has now been ruled out by the national park for housing development, in both the short or longer term. This came about from feedback in the pre-MIR stage for the proposed plan and negative comments the reporter made on this area in the examination for the presently adopted local plan.

Our client commissioned their own landscape capacity and visual impact work for the land to the south of Stirling Road in early 2013. Subject to an appropriate level of landscape and visual assessment and subsequent detailed design we are of the opinion that the proposed development site being promoted by our client, both phase 1 and 2, has the potential to provide a housing allocation within Drymen. Phase 1 has the ability to accommodate 30 units, with phase 2 providing the opportunity for further investigations in terms of capacity.

A landscape masterplan should be developed, possibly involving advanced structure planting, to further develop the existing landscape framework of structural landscape on the northern, southern and western boundaries and to reinforce the current open boundary to the east of the site.

We are of the opinion that the promoted site will:

Relate to existing infill development to the immediate west; be well contained by long term defensible boundaries in the form of Stirling road and the A811 to the north and south; benefit from the existing and maturing landscape structure associated with these roads; will be contained by the proposed development of the infill site to the immediate west and will again benefit from screening and landscape framework associated with scrub vegetation being retained and enhanced as part of that development.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
Based upon this review and our knowledge of the site, we are of the opinion that the site being promoted by our clients has the potential to deliver a housing opportunity for Drymen within the context of a robust landscape framework and within long term defensible boundaries.

We are of the opinion that appropriately designed residential development in this location can deliver, ‘housing growth whilst remaining completely consistent with the established landscape character’ of Drymen and the Loch Lomond and the Trossachs National Park.
4.3.16 Options and Solutions for new housing in the Settlements Question 3: What option do you support? Why?

Options and Solutions Housing in the Settlements Q3 –What option do you support?
Drymen currently requires 100% affordable housing on sites of 4 or more units (25%-50% elsewhere). The proposed revised policy of 50% for Loch Lomondside (including Drymen) is supported. The preferred option of lowering the affordable housing requirement and widening the application to all new housing developments is also supported. The approach of requiring smaller sized units to be built is in the same spirit as Stirling’s LDP Policy 2.2 which requires a mix of types and sizes to be provided.

It may be of interest that the Stirling Proposed LDP included a requirement for an Affordable Housing contribution of 50% in ‘Highly Pressured Areas’ such as the western rural villages. However, at the Examination stage the Reporter recommended this was reduced to 33%. The basis for this modification was due to concerns that 50% would likely constrain development opportunities unduly and discourage potential developers from bringing forward sites in certain areas. A similar argument could be made for the Park area.

The significant contribution within the Park to the housing land requirements of small sites of less than 4 units, and the inclusion of windfall in meeting land supply targets, suggests that the extension of the contribution to less than 4 units would be a justified approach that would help to meet affordable housing need. Although sites may be coming forward individually or at a small scale, the cumulative pressures are still there.
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.17

Options and Solutions for new housing on sites adjacent to settlement boundaries Question 4: What option do you support? Why?

Customer Reference: 00092  Organisation: West Dunbartonshire Council
Customer Name: (If applicable)
Comment Reference: LDP01/MIR/CONS/00092/1/006  Comment Method: OLDP  Customer Type: Local Government

Verbatim Comment:
On the matter of affordable housing from sites adjacent to settlement boundaries, Alternative Option 2 is preferred. Housing development should be plan-led, and on the basis of planning for a generous supply of 75 units per annum, there should be no need for additional sites to come forward via the planning application process.

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.17

Options and Solutions for new housing on sites adjacent to settlement boundaries Question 4: What option do you support? Why?

Customer Reference: 00106  Organisation: (If applicable)
Customer Name: Anne Lee
Comment Reference: LDP01/MIR/CONS/00106/1/012  Comment Method: OLDP  Customer Type: Individual Resident

Verbatim Comment:
Housing Qu 5. I am strongly in support of Alternative Option 1 and very opposed to the Preferred Option. I believe that any diminution of the affordable housing in perpetuity policy is at odds with the Park's aim of securing a housing supply that meets the needs (long term) of the area and its population. The MIR itself notes the dangers of open market housing, yet a policy of 10 year affordability is merely delayed open market housing. It is also possible, given the recent change in the law re council housing sales that local councils maybe more able and willing to support the supply of affordable rented housing.
**Chapter Commented on:** 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.17

**Options and Solutions for new housing on sites adjacent to settlement boundaries Question 4: What option do you support? Why?**

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**Verbatim Comment:**

Luss is a village constrained by the loch and the A82, and as such most developments in the area are going to fall into this category.

Such small sites lack economies of scale, and a punitive sanction where the financial contribution or provision of small scale houses is too great will simply make development non-viable.

It is difficult to support an option where the details is missing; what would be the financial contribution required for smaller sites?

In principle we support the idea, but cannot recommend it without the level being specified.

In principle we support the preferred option, but cannot recommend it without the level being specified.
4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.17

Options and Solutions for new housing on sites adjacent to settlement boundaries Question 4: What option do you support? Why?

Customer Reference: 00200
Customer Name: MacTaggart and Mickel
Comment Reference: LDP01/MIR/CONS/00200/1/005
Comment Method: EMAIL
Customer Type: Private Business

Verbatim Comment:
P 66 On Sites Adjacent To The Settlement Boundaries. Preferred option - we support the proposal to allow for an element of open market housing to enable development, where it is demonstrated that this is necessary to cross-subsidise affordable housing provision. The percentage of open market housing would be calculated on a case by case basis depending on specific site costs.
Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.17

Options and Solutions for new housing on sites adjacent to settlement boundaries Question 4: What option do you support? Why?

Customer Reference: 00212
Customer Name:
Organisation: Stirling Council
Comment Reference: LDP01/MIR/CONS/00212/1/010
Comment Method: EMAIL
Customer Type: Local Government

Verbatim Comment:
Option and Solutions for new Housing on sites adjacent to settlement boundaries Q4 - What option do you support?

The original ‘exceptions’ policy HOUS3, where the aim is to support sites for 100% affordable housing at the edge of settlements, is supported by SPP. Paragraph 86 of SPP indicates that this approach is most likely to be appropriate for small-scale sites to provide for locally arising needs. The MIR Preferred Approach looks to change this to an ‘enabling’ policy, where market housing would also be supported in these locations to cross-subsidise affordable housing. No indication is given of the scale of development appropriate for this preferred approach and concerns are raised as to the extent of development that could come forward which could encroach into the countryside, contrary to SPP and the Plan’s strategy to direct development into existing settlements.
b) Settlements adjacent to the settlement boundaries

We agree with the proposed -preferred option: to amend current Local Plan Policy Hous 3. Hous 3 currently allows for development adjacent to the settlement where there are no available sites within the settlement but requires 100% affordable housing. We agree that this should be amended to allow for some open market housing to also be provided where it is demonstrated that this is necessary to cross-subsidise the affordable housing provision.
### Options and Solutions for new housing within Small Rural communities and Building Groups in the Countryside

**Question 5: What option do you support? Why?**

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**Verbatim Comment:**

Alternative 1, have you lost your minds or did you ask a developer to write the strategy for you? Your preferred proposal is ridiculous, I would remind you again that you exist to serve the interests of the residents of the park, not any old developer who fancies making a few quid at the expense of the quality of life your residents currently enjoy. You work for us, not the developers.
Main Issues Report Our Live Park Comments Received

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Options and Solutions for new housing within Small Rural communities and Building Groups in the Countryside Question 5: What option do you support? Why?

Customer Reference: 00106
Customer Name: Anne Lee
Comment Reference: LDP01/MIR/CONS/00106/1/011
Comment Method: OLDP
Customer Type: Individual Resident

Verbatim Comment:
I agree with Alternative Option 1. I believe that it is strongly preferable to build within existing communities and the only reason to deviate from this would be to enable 100% affordable housing, in perpetuity on sites adjacent to settlements.

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.18

Options and Solutions for new housing within Small Rural communities and Building Groups in the Countryside Question 5: What option do you support? Why?

Customer Reference: 00108
Customer Name: Susan Calder
Comment Reference: LDP01/MIR/CONS/00108/1/006
Comment Method: OLDP
Customer Type: Individual Resident

Verbatim Comment:
I PREFER ALTERNATIVE OPTION 1.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
4.3 Main issues, potential options and solutions

Options and Solutions for new housing within Small Rural communities and Building Groups in the Countryside Question 5: What option do you support? Why?

Luss Estates supports alternative option 2.

Even changing to a 10 year guillotine on affordable housing / local occupancy will simply stop new houses in the countryside being built.

If the house is for rent, then there will be no reasonable return for 10 years as the rent level will be forcibly reduced = it won’t be built.

If the house is for immediate sale, then its value is reduced by this = it won’t be built.

We would propose that option 2 is adopted for a period of 5 years, and is then replaced by the preferred option.
Options and Solutions for new housing within Small Rural communities and Building Groups in the Countryside

Question 5: What option do you support? Why?

Customer Reference: 00169
Customer Name: David Morris
Comment Reference: LDP01/MIR/CONS/00169/1/008
Comment Method: OLDP
Customer Type: Individual Resident

Verbatim Comment:
I support Alternative Option 1.

It is crucial that affordable housing is protected in perpetuity.

A 10-year rule as suggested might meet a need temporarily but clearly fails to guarantee the provision of long term affordable housing.
Options and Solutions for new housing within Small Rural communities and Building Groups in the Countryside

Question 5: What option do you support? Why?

Customer Reference: 00173
Customer Name: Isabella Morris
Comment Reference: LDP01/MIR/CONS/00173/1/007
Comment Method: OLDP
Customer Type: Individual Resident

Verbatim Comment:
I support Alternative Option 1.

Long term affordable housing should always remain as such. Ten years does not help the future needs of a community.
### Options and Solutions for new housing within Small Rural communities and Building Groups in the Countryside

**Question 5: What option do you support? Why?**

- **Verbatim Comment:**
  
  I support Alternative Option 1. 10 years would appear too short to retain Affordable Housing Status. It would be preferable to stick to 'in perpetuity' or a longer time span, or allow the houses to become rental properties under Housing Associations. The fallout form the sale of Council Houses and the efforts now being made to reverse some of its effects should be noted.

- **General.**

  It should be remembered that although many people live in the Park and work in the city these people also contribute to the local economy by employing local tradesmen many of whom rely on this work during the winter. Making the area less attractive to professionals working outside the park may have a detrimental effect on the economy.
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.18

Options and Solutions for new housing within Small Rural communities and Building Groups in the Countryside Question 5: What option do you support? Why?

Customer Reference: 00128
Customer Name: Christopher Mosley
Comment Reference: LDP01/MIR/CONS/00128/1/003
Comment Method: FORM
Organisation: (If applicable)
Customer Type: Individual Resident

Verbatim Comment:
I prefer Alternative Option 1
I am against the prospect of Affordable Housing being sold off after 10 years.
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<td>Verbatim Comment:</td>
<td>I support Option 1. Allowing housing to be sold on in 10 years would lead to affordable housing problems arising again then.</td>
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<tr>
<th>Chapter Commented on:</th>
<th>4 Identifying the Main Issues - what needs major change and what are the options? &gt;&gt; 4.3 Main issues, potential options and solutions &gt;&gt; 4.3.18</th>
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<td>Individual Resident</td>
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<tr>
<td>Verbatim Comment:</td>
<td>I support Alternative Option 1. Affordable housing should always remain so rather than being sold off in the future for other purposes.</td>
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Option and Solutions for new Housing within Small Rural communities and Building Groups in the Countryside Question 5: What option do you support? Why?

The proposal to change policy HOUS4 to require housing to be retained as affordable for 10 years rather than in perpetuity seems a pragmatic approach to the problem faced by the Park of achieving affordable housing in the area. Stirling Council raised concerns about the practicalities of this policy at the Local Plan consultation. However, as this will not solve the housing shortage in the longer term, perhaps there could be a requirement for developer contributions to affordable housing after 10 years, if the house went to open market.
4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.18

Options and Solutions for new housing within Small Rural communities and Building Groups in the Countryside Question 5: What option do you support? Why?

We note that the Small Rural Communities include Balquhidder, Brig o’Turk, Kinlochard, Balmaha and Milton of Buchanan and that current Policy Hous 4 allows for 100% affordable housing “in perpetuity” developments in these locations and in building groups within the countryside.

The proposed amendment within the preferred option would allow for homes to be built in these locations that would only need to be affordable for up to ten years, and could then change to open market housing. The homes would have to be small/medium sized and be the household’s main dwelling.

We think that some flexibility around the “perpetuity” requirement might be helpful in bringing forward land for development and meeting short-term needs. This might allow for the application locally of the sort of models that are being taken forward elsewhere (including by affordable housing providers) that involve residents being given the first option to buy the home at the end of the period of tenancy, and with some of the, usually Mid-Market, rent collected in the meantime being set aside to help contribute to the deposit required at the purchase point. However the devil is in the detail on such schemes and some criteria would need to be set for when such schemes are acceptable.

We also feel that in such locations, where there may be no further options to develop affordable housing, that such a scheme should only be allowed where there is also some provision for units that are affordable in perpetuity. This might however depend on the numbers involved and perhaps schemes of less than four units might be permitted on this basis but with a financial contribution attached - albeit a lower one that reflects the temporary affordable housing provision.

Consideration might also be given however to allowing for this sort of arrangement as part of the affordability requirement within settlements and adjacent to settlement boundaries.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
It would appear that neither the current Policy nor any of the newly identified options would allow for RSHA to take forward the planned development at Balmaha which we understand to be acceptable in-principle to the Park. This involves the development of 10 affordable (in perpetuity) units for social rent but with five private, market-price homes or building plots, to also be developed, to help cross-subsidise the costs of the affordable homes. Early clarification on this would be appreciated.

**Chapter Commented on:** 5 Placemaking - What sites should be considered for development? >> 5.1 Introduction >> 5.1.1

**Placemaking Question 1:** Do you agree with the sites identified for development and the proposed Placemaking Priority sites?

**Customer Reference:** 00093  
**Organisation:** Scottish Natural Heritage  
**Customer Name:**  
**Comment Reference:** LDP01/MIR/CONS/00093/1/012  
**Comment Method:** OLDP  
**Customer Type:** Public Body

**Verbatim Comment:**

We have provided comment on some of the placemaking priority sites and development sites against each settlement section. Some of these development sites are not always explicitly linked (at least on the settlement plans) to village centres by active travel routes. See comments on specific settlements for more details.

SNH would be pleased to advise on the natural heritage and access opportunities prior to the preparation of any master plans and design guides for the long term development sites at Callander, Tyndrum, Succoth and Crianlarich.
A number of sites included in the Placemaking section of the MIR concern us as they either contain or are adjacent to ancient woodland and others contain, or are in proximity to, other woodland/wooded sites. These are listed in the attached table with reasons for our concern.

We OBJECT to the following sites being identified for further development since this will lead to the loss of ancient woodland and damage to ancient woodland.

We consider that these site allocations should not be taken forward unless the protection of the adjacent woodland can be guaranteed and therefore request that where the allocations are taken forward, sufficient buffering between the proposed development and woodland should be identified in planning policy at the appropriate stage.

We recommend that if any protected species are present on the development site or adjacent to the development site that the appropriate survey work is carried out to determine the impacts that the development may have on the populations.

Arrochar and Succoth MIR7B - Ancient Woodland adjacent to site.

Arrochar and Succoth ST3 AND CU2 - Ancient Woodland adjacent to site.

Please see Appendix 6 for further information
I would like to see no large development.

Loch Lomond is one of my favourite places on earth. It gives me a great sense of peace and calm being surrounded by all the beautiful natural views. More houses and businesses would take away from the look of this and I think would effect tourism as it is such a wonderful place for camping and caravanning however if people are feeling that it is become more of a built up town they will be less likely to see that as an escape.
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 5 Placemaking - What sites should be considered for development?

Customer Reference: 00107
Customer Name: Non Attributable
Comment Reference: LDP01/MIR/CONS/00107/1/023
Comment Method: ONLINE
Customer Type: Information not available

Verbatim Comment:
I would welcome a safe and good-sized cycle path along the whole border of Loch Lomond, to allow people to enjoy access to the Loch in as sustainable a manner as possible, and without contributing to pollution and ambient noise.

Picnic spots at regular intervals would be excellent too!

Chapter Commented on: 5 Placemaking - What sites should be considered for development?

Customer Reference: 00113
Customer Name: Luss Estates Company
Comment Reference: LDP01/MIR/CONS/00113/1/023
Comment Method: OLDP
Customer Type: Private Business

Verbatim Comment:
Luss Estates does agree with the sites identified, but would add a number that have been exclude - see each section in the following responses.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivelpark.com

Page 267
On the 29 May 2013, Keppie Planning wrote seeking pre-application advice on the ability to subdivide their plot and form a single additional plot, as indicated below.

In the response from the Park, dated 20 June 2013, ref PRE 201310127, it was explained that there were no current policies within the Adopted Plan that would enable a positive recommendation for such a sub-division within an existing plot as Policy HOUS4 would only allow an affordable house within a "Building Group" and Policy HOUSS was released to rural business need, which we don’t claim.

The conclusion of the advice given has led to this representation.

"Conclusion

From the information available to me, the proposal would not appear to qualify under Policy HOUS5 and could therefore only be supported if it met the terms of Policy HOUS4 (and related guidance) and provided for identified affordable housing needs. There is no development plan policy in the National Park for sub-division of garden ground to provide for new houses. On this policy issue, your client may therefore wish to comment on the content of the upcoming Local Development Plan."

Representation

Mr & Mrs Simmons seek the ability for an application to sub-divide their plot to create a single new house. In order to do this some policy context requires to be included in the forthcoming LDP, to enable an evaluation of such a proposal which is common in this part of Scotland, where housing land is in short supply.

We firstly assume in the context of Policy HOUS4 that Buchanan Castle Estate is a "Building Group on the Countryside" as it is not listed as a rural community '4' below the policy as page 67 of the MIR.

It is considered that the status of Buchanan Castle Estate could be reviewed as it is a larger group of houses and community that any of the hamlets listed in '4' on page 67,
however we are content that a revised Policy HOUS4 would still be applicable to Buchanan Castle in any event.

We seek two options through the Main Issues Report heading towards the Local Development Plan stage.

(A) A new Policy HOUS? "Sub-Division of a Plot - or "Development within Garden Ground". A policy which sets specific criteria to enable, within the Park Authority area, the sub-division of existing plots to create a new house for normal use, provided it met criteria development management criteria related to size, privacy, development etc.

(B) That Policy HOUS4 be re-worded to incorporate words along the lines suggested in Alternative Option 2, which is currently an option not favoured, as outlined in page 67.

It is anticipated that the amended HOUS4 as drafted in page 67, will not materially change the prospects for increasing the population and meeting housing need in the Park area.

Having said that, there may well be some circumstances where this policy would work, but. not in our view Buchanan Castle, due to it outlying location it is not suited to affordable housing. The current estate has a very high population of non-retired residents and is "sold" as a family lifestyle location and not a retirement village.

We suggest a compromise policy which combines the preferred option with the key aspect of the not favoured Option 2.

We note the benefits of Option 2 regarding the boost for development sites and the potential generation of funds for affordable housing.

We seek that preferred option be amended to add:
"In circumstances where affordable housing is not appropriate for the location or where a house of 100 sq m (max) is not in keeping with the surrounding area then a sub-division of an existing plot or an infill site could be developed for open market housing subject to a financial contribution being made to help fund affordable housing at more suitable sites(locations within the Park;"

Conclusion

In conclusion, the current Park Plan does not have any context for evaluating the development of a plot in a sub-division situation within existing garden ground and we seek, as invited to do by your pre-application response, that this situation is addressed in either of the ways suggested in the representation through the emerging Local Development Plan.
Our client, Alan Devine, owns a site of around 7 acres on the banks of Loch Eck. The location plan attached to this representation illustrates the extent of the proposed site for residential allocation in red and the extent of our client’s ownership in blue.

Our client intends to develop the land for three new residential properties of a high quality, sustainable design and eco-friendly nature. The properties will be of an appropriate scale and design in keeping with the surrounding setting and character of the area. The location of the properties will mean that they will be obscured from view from the east of the loch and the A815.

It is the desire of our client to occupy these properties with his family in order for them to continue running the nearby Whistlefield Inn. Given the rural location and limited properties on the market in the area, accommodation near to the Inn to allow the family to manage the business is restricted, hence the desire to allocate the site for residential.

At present, the surrounding area constitutes a small development/rural building grouping, as there are numerous buildings in the surrounding area. The Whistlefield restaurant and inn is located to the east of the site, across the A815, whilst there are over 20 chalets located to the south of the inn, with a further 8 chalets being granted permission to the east of the inn under planning permission 2013/0250/DET.

As such, we state that the area has become a small rural community/a building grouping in the countryside and the proposed residential allocation should be included in the emerging Plan in acknowledgement of this.

In summary, we submit the attached site as a potential residential allocation to the Main Issues Report for consideration of the Council. The site is located close to existing building groupings which have created a strong, rural community. As such, the proposed allocation would fit well into the surrounding area, with the intended residential properties being of a suitable scale and design, reflecting the landscape character of the surrounding area. Therefore we would suggest amendments to the document to support this residential allocation.

(LOCATION PLAN ATTACHED)
Please see Appendix 2 for further information

Chapter Commented on: 5 Placemaking - What sites should be considered for development?

Customer Reference: 00218
Customer Name: 
Comment Reference: LDP01/MIR/CONS/00218/1/009

Organisation: Rural Stirling Housing Association
Comment Method: EMAIL
Customer Type: Other Organisation

Verbatim Comment:
Brig O’Turk

Does not appear to be mentioned.
## 5 Placemaking - What sites should be considered for development?

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**Verbatim Comment:**

Strachur South Rural activity area (local plan site RA3)

We would be likely to object to the development of this site unless appropriate additional information is submitted / the site plan is amended to remove the sections thought to be at risk. A basic FRA will be required either prior to, or in conjunction with any planning application. This will need to define the areas at risk of flooding, the relative vulnerability of the proposed use and appropriate detailed design layout and levels.
Of great concern, however, was the identification of land to the east of Braeval and adjoining the Rob Roy Way for a potential 40-50 self-catering chalet development with the prime purpose of increasing business in Aberfoyle but this is a site which lies totally within the parish and community council boundaries of the Port of Menteith.

The Lake of Menteith is the largest and arguably, the finest rainbow trout still-water fishery in Scotland with 14,000 fishing visitors per year; it is also an SSSI because of the presence of a rare plant called slender naiad. The burns on the hillside, including a number in the Braeval section, which flow into the Lake, are also SSSI’s for their full length and including 3m width of the banks on either side. In addition, they supply water to the Lake of Menteith Fisheries’ fish breeding tanks. Consequently, any development resulting in serious pollution or restriction to these burns would have a disastrous effect on the future of the Fisheries which provides much needed local employment.

If this proposed development is progressed and a planning application eventually submitted, it is assumed that it would be necessary to carry out an environmental survey to ascertain what flora and fauna are present. It is already known that the woods are home to red squirrels, pine marten, bats and a colony of adders, which are a protected species and for which the Forestry Commission has created a special clearing to safeguard their habitat. The previous owner of Stonefield, a respected entomologist, also identified a number of unusual butterflies in the area.

The consultation document identifies a perceived need to increase visitors to Aberfoyle in an effort to support ailing businesses. It assumes that this could be achieved by increasing self-catering accommodation in the area hence the proposed development near Braeval. However, in the opinion of members of the Port of Menteith Community Council, there already exists abundant self-catering accommodation in the Aberfoyle area, e.g. Forest Hills, Tigh Mhor, Trossachs Holiday Park etc., in addition to that in the Port of Menteith. Yet, it is questionable that if these existing units are currently insufficient to generate business in Aberfoyle, whether developing additional accommodation would be the solution?

This type of development would create unfair competition for the existing number of self-catering units in the Port of Menteith. These provide a range of accommodation - lodges, chalets, cottages, flats etc., - but despite the recent evolvement of ‘staycationing’, generally full occupancy levels in these units are rarely achieved even at the height of the tourist season. Where good occupancy levels are achieved, this is as the result of extensive marketing and discounting of rates but profit margins have fallen year on year since the recession and as the £ strengthens, and people resort to holidaying abroad again, this accommodation will inevitably suffer...
It is the Community Council’s opinion that it is totally illogical that a questionable attempt to improve trade in Aberfoyle should be to the detriment of existing businesses in the Port of Menteith but if despite this, the National Park Authority takes the decision to proceed further with the proposed development at Braeval, it will be very vigorously resisted by the Community Council and residents in the Port of Menteith.

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.2 Aberfoyle

Customer Reference: 00091
Customer Name: Dave Mulen
Comment Reference: LDP01/MIR/CONS/00091/1/001
Organisation: (If applicable)
Comment Method: OLDP
Customer Type: Individual Resident

Verbatim Comment:
This development will destroy what makes people want to LIVE IN and visit the area in the first place. This is supposed to be a protected National Park?
The boundary of the Lake of Menteith Site of Special Scientific Interest (SSSI) overlaps with this allocation because it is drawn around a number of tributaries of the Lake that snake northwards through the forest. The Lake of Menteith is important because it supports a population of Slender Naiad (a rare plant that is a European Protected Species) and a range of other plant species than depend on water that contains moderate amounts of nutrients. The Lake is currently in unfavourable condition with respect to these features and therefore any proposed activity that would potentially increase nutrient loadings to the water body require careful consideration. Potential impacts from this proposal could include:

- Construction site activities - at the construction stage a number of activities have the potential to pollute watercourses, including felling of trees, construction of roads and disturbance of soil, in addition to use of potentially polluting substances, such as concrete and paint.

- Wastewater and surface water drainage (i.e. water running off roads etc.) once the site is built - septic tanks may contribute considerable loadings of nutrients to water bodies and even when properly maintained, nutrient loadings from them would be expected.

Through careful design and mitigation measures, it should be possible to avoid impacts on the SSSI. However, given its importance we would suggest that if this site is to be taken forward in the plan, further joint working with SEPA, FCS and SNH will be required to ensure that potential impacts can be avoided. This should include a review of the number of chalets proposed if necessary.
This is a terrible idea. The place is hooching with red squirrels and Scottish Wildcats. Surely these are protected? It is 2 miles from Aberfoyle if the plan is to increase tourism there. But surely the fact that local b&b's/holiday lets are not full is telling us that it is the provision in Aberfoyle that needs addressing and money would be FAR better spent making that area - particularly down by the river - more attractive to tourists and day trippers - you could make a beautiful walk way down by the river but it is all a bit skanky at the moment. Please do not kill off endangered species and pollute the Lake of Menteith in the name of tourism. That would be very counter productive and open you up to so much criticism.
### Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.2 Aberfoyle

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**Verbatim Comment:**

I have self catering lodges, I have now consulted with many of small independent self catering accommodation providers in and around Aberfoyle, we all agree this development is not required as there is already far too many. This would be extremely detrimental to existing businesses who are already having to compete with each other. We are all of the opinion we would not support this development and do everything that we could to stop planning permission. Please keep me informed of any future meetings.

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### Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.2 Aberfoyle

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**Verbatim Comment:**

I feel this would not be good for this area. What we need is better paths for walkers horse riders and cycles. All the tracks where felling has taken place need to be restored. Why not utilise what we already have and not spoil a area of natural beauty by building when there is no need for it. Keep the forest for walkers etc.
### Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.2 Aberfoyle

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**Verbatim Comment:**

I do not understand why you are inviting people to send informal feedback. It is hard not to see this as a way of distracting people from formally responding. I am genuinely interested in knowing why you have set this up. If it is something you feel is entirely necessary, the layout of this page should be far clearer. The main focus should be the formal response section, with the informal feedback following this.

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### Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.2 Aberfoyle

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**Verbatim Comment:**

I would like to note that this is a terrible idea. All this will do is increase road traffic density, noise and light pollution in one of the UKs most beautiful areas. Aside from the visual impact of the cabins themselves, the other facts which I have mentioned would certainly lead to the whole area becoming less desirable for people looking for a natural, quiet and peaceful area. 10 cabins I could understand, but 50 is ridiculous. I seriously hope this plan is scrapped as the impact on the local area will be widespread and far reaching and not just for the community.
"I do not live in the NP, but have written about it for many years (including, most recently, major contributions to the Friends of Loch Lomond website).

I would like to direct your attention to the fact that I note I have been fairly uncomplimentary about the experience of the above road, from a visitor point of view. Though a bit tongue in cheek the comments are on the latter half of a post to be found at http://www.scotlandinaweek.com/cruising-loch-lomond.html

Basically, cyclists and sightseeing car drivers do not mix well on this road. I suggest in the piece mentioned above that the road should be a dedicated cyclists way but realise this would create some difficulties."
If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com

Main Issues Report Our Live Park Comments Received

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.2 Aberfoyle

Customer Reference: 00107
Customer Name: Non Attributable
Comment Reference: LDP01/MIR/CONS/00107/1/056
Comment Method: ONLINE
Customer Type: Information not available

Verbatim Comment:
I object on behalf of my family to the proposed development on the grounds that as a SSSI the safeguarding of the natural heritage will be no longer tenable. People, dogs, cars, lights, drains, noise and the on going disturbance from visitors and owners (whoever the developer might be) will mean an end to the natural assets on site and within miles of it.

The oasis of peace that surrounds The Lake of Menteith will be threatened by environmental pollution unforeseen up until now.

As the distance from Aberfoyle is outwith a short walking distance, cars will be used for every trip to the village and once in the car many would choose to go elsewhere anyway, Aberfoyle missing out after all.

The official response document is way beyond many who would wish to make comments, complicated in the extreme.

The fundamental disturbance to the current natural setting will degrade what we understood to be a conserved area, thanks to the SSSI.
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.2 Aberfoyle

Customer Reference: 00107
Customer Name: Non Attributable
Comment Reference: LDP01/MIR/CONS/00107/1/021
Comment Method: ONLINE
Customer Type: Information not available

Verbatim Comment:
I like to see some development in Aberfoyle, tidying up around the high street is important. There is a lot of parking there for Mountain bikers, who go off on the many trails around Aberfoyle. Proper signage and better cycle paths to the trailheads would be superb and maybe concentrate on this in the tourist information. Encourage a bike shop/bike cafe in the town would help to make it a real centre for mountain biking in the Trossachs. Also work with some trail designers to create some single track trails away from the fire roads as well as properly grading them for different capabilities.
5 Placemaking - What sites should be considered for development? >> 5.2 Aberfoyle

Aberfoyle does NOT need more housing or accommodation for visitors but the centre of the village desperately needs to be improved i.e replacement of sodium streetlights which are unnecessary & an eyesore & better maintenance of buildings / shop fronts.

An improvement in the quality of retail outlets would be great.

Removal of smelly chip/ice cream van in car park & improvement of waste land that surround it.

A zebra crossing or similar across main street would be useful, especially for kids to allow them to get to the park without being taken by an adult.

Aberfoyle attracts many visitors but it must be a real disappointment once they arrive.
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<td>Verbatim Comment:</td>
<td>Environmental madness to destroy a large area of the National Park at Braeval to build holiday lodges. What about all the protected species of animals that live there? The impact on noise levels of (potentially) 200-odd people congregated in the same area? Potential for forest fires from BBQs etc? Unbelievable that this is even on the table as a proposal!</td>
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<td>Verbatim Comment:</td>
<td>The improvements to Riverside Car Park should be extended to include the riverside paths on either side of the burn coming off the Dukes Pass. These paths are currently below the standard required. There was a suggestion that a footbridge be placed to allow a return walk on the other side of the river and this should also form part of the overall plan. These paths and the bridge in particular should be multi-user ie suitable for wheelchairs.</td>
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</table>

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
A development of this size 2 miles from Port of Menteith is not the cure for Aberfoyle problems. Without development of the same scale in Aberfoyle the visitors to the holiday village will go East where the shopping experience is much better.

Why not build closer to or in Aberfoyle? They have given up on building in and around Aberfoyle far too easily. The river is completely ignored.

Why not build a waterfront development on stilts or create a basin with floating house boats, make the problem the solution! Create something innovative.

I see no planning for a major mountain bike trail system that could turn Aberfoyle into the Mecca for a fast growing and green sport.

The Scottish government’s document of July 2013, Tourism Development programme for Scotland, states Self-catering tourist accommodation in the countryside is by and large well provided for throughout Scotland and the National parks own plan was looking for small scale, quality developments. A large development of 50 properties is not in line with these guidelines and will have a negative impact on existing self-catering businesses.
We are writing to lodge an objection to the proposed chalet development at Braeval, Aberfoyle. We run 2 four star businesses in Aberfoyle. We have spent many years and a lot of investment building up our business and take a pride in providing a first class service. We use local businesses as much as possible and our guests spend a lot of money in the local shops, restaurants and other visitor facilities which we actively promote. During this period of time many more accommodation businesses, especially in the self-catering sector, have opened in the local area. We now have to work a lot harder to fill our weeks, and as many of our fellow operators will tell you there are many weeks not filled throughout the year especially through the long off-season. We are all for fair competition as it keeps standards high and prices keen, but, to suddenly have an additional FIFTY self-catering units open on your doorstep is grossly unfair to us and our fellow operators. This is industrial scale development on the edge of a small village comprising of a couple of hundred houses and is totally disproportionate! Trossachs Holiday Park, has expanded rapidly recently (on the southern approach), we also have the Forest Hills complex to the west and Tigh Mor to the north and if Braeval goes ahead to the east we will be surrounded by the large operators, severely affecting the small local accommodation businesses. This would have a similar effect that a large out of town supermarket development has on the small trader, on the High Street - closure! Most of our B&B’s and self-catering operators are small, local, independent, family run businesses, people who live and work in the Aberfoyle area and whose business is their main, and often their only source of income.

The irony of this situation is that the proposed site is owned by the Forestry Commission ie public owned land bought by us, the taxpayer! Your Forward Planning officer was unsure whether FC was planning to operate the proposed business themselves or sell the land to a private operator. If the former is the case we have a double irony, ie taxpayers money for a development that could severely impact on our businesses.

With regard to the environmental impact Braeval is enjoyed by many people (including ourselves) who walk, cycle and horse ride in this beautiful part of the forest. A development of this size would have a serious and detrimental impact on the Braeval area. This part of the forest is rich in wildlife, what about the effects on them? As you know, the water run off reaches Lake of Menteith, an SSSI site, therefore this proposed development could have an adverse effect on the wider, as well as the local area. The visual impact on the approach to the village would be severe. Something of this Centre Parcs size development may be appropriate on the edge of a large holiday town NOT on the edge of the small village of Aberfoyle. Let’s keep it special and unspoiled and keep any development proportionate and help protect our local people and their businesses and the environment! Is this not the duty of the National Park?
The proposal to build 40-50 self catering lodges within the forest between Aberfoyle and Braeval is an entirely out of scale proposal. This would represent a massive housing development requiring no doubt 'up grading' of access and I expect urban style roundabouts with street lighting etc completely destroying the dark skies possibility of this area, the quiet RURAL aspects of a NATIONAL PARK-in fact making a big suburban environment within a damaged and depleted, degraded rural environment-if you are not going to protect the park who is? Or is the national park simply a golden property development opportunity?

5 lodges adjacent to Aberfoyle with pedestrian access to the shops / eateries in Aberfoyle would be more appropriate sustainable tourism.

Sited where you plan to put it, people would drive everywhere polluting the environment - hardly sustainable tourism.

To support businesses in Aberfoyle a better approach would be to put on a BUS SERVICE from Glasgow- a major population centre but with no direct bus link!!!!!!!!!

In summary-the proposed location of the lodges is inappropriate being too far from the village of Aberfoyle with its local services only likely to be accessed by car - and once in the car visitors could well decide to go elsewhere anyway. The proposed number is entirely out of scale with the village of Aberfoyle and the hamlet of Braeval.

Secondary consequences of this huge development on roads with no doubt extra out of keeping street lighting and roundabouts would be another step in the destruction of the special qualities of the natural environment of our National Park.
We acknowledge this document as representing a professional approach to future planning in the National Park. There are aspects of the report that we particularly see as creative and visionary for the social and economic security of our community in the future and we commend the National Park for this work.

There are a number of points that we would ask are considered specifically in relation to the area of the Strathard Community Council:

Aberfoyle is the main community town within Strathard. We consider it unfortunate that each time Aberfoyle is mentioned in the report the problem of flooding is also emphasized. We would point out that Aberfoyle is not the only town within the National Park that is at risk of flooding. Following a period of consultation with the local community a flood risk strategy has been agreed and flood prevention measures are being implemented by Stirling Council; it appears however, that the National Park is unaware of this and still sees flooding as the major issue when considering potential investment and development in the town. There is a clear suggestion both in the text of the report and by implication when set alongside other towns described in the report that Aberfoyle is not a high priority for development in the National Park.

Propose: undertake a text re-write to emphasise planned flood prevention work and reinforce benefits of living, working and holidaying in Aberfoyle and Strathard.

The full extent of collaboration with other key stakeholders such as the Forestry Commission and Local Councils is not clear from the Main Issues Report. For example, the recent important work undertaken by Stirling Council on flood risk management is not reflected in the report and in the case of Aberfoyle this gives a misleading portrayal of the current position. LLTP states its commitment to those who live in the National Park; this needs to be reinforced with a strong and detailed commitment to work with stakeholders on issues such as public transport, roads, education, health facilities, housing and care provision for the elderly and those with disabilities.

Propose: Establish transparent procedures for collaboration with key stakeholders and service providers.
The support for additional tourist development is welcomed. This Community Council urged LLTNP at the consultation on the previous Development Plan to develop an appropriate additional visitor attraction in or close to Aberfoyle; we would still welcome this as a part of the 2014 Development Plan. However, the suggested large scale self-catering development (MIR4) proposed for Braeval / Port of Menteith raises several concerns, and development at this location should only be permitted if it significantly diversifies provision and is sensitive both to the environmental impact on the surrounding area and the impact on local community. We note also that the proposed location is not the one close to Braeval discussed at the Aberfoyle Charrette as a potential development area, but further to the east, and suggest alternative locations should be investigated.

Consideration could also be given to shared residential development rather than solely self-catering accommodation. Our area providers currently have difficulty achieving full occupancy for existing self-catering provision; additional self-catering units should be designed to diversify facilities and encourage new and different types of tourism which would attract additional visitors. Other areas of the country have seen success with eco-style self-catering facilities, tepee and other forest-friendly accommodation. This type of development, if a suitable location could be identified, would have the added benefit of complementing and blending with the local forest environment and using and upgrading the existing Rob Roy Way to encourage cycling and walking to Aberfoyle so creating the town as the focal point of this new facility.

Propose: Identify additional tourist attraction for Aberfoyle. Undertake further consultation on the proposed tourist development near Braeval / Port of Menteith. Diversify tourism in Strathard.
As with much of the National Park, the lochs within Strathard play a key part in the life of the community. The increasing pressures on these vibrant natural resources remain a concern and the growing numbers of visitors require careful planning, infrastructure investment and sensitive management. The Community Council has noted the increasing impact of litter, anti-social behaviour, parking problems and informal camping.

The Five Lochs Plan of November 2012 demonstrated a commitment by LLTNP to develop a coordinated and integrated approach to managing the increasing visitor numbers and the impact these visitors have on the natural environment. We request that the evaluation of the Five Lochs Plan and the successes identified in the first two years of operation are assessed and where appropriate are extended and incorporated for Strathard into the final Local Development Plan. In addition, we would urge LLTNP to cooperate with the Forestry Commission to further develop the opportunities for walking and cycling in the Strathard area.

Propose: Incorporate successes of Five Lochs Plan across all of the National Park and collaborate with stakeholders to promote walking and cycling activities.
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.2 Aberfoyle

Customer Reference: 00055  
Customer Name: Strathard Community Council  
Comment Reference: LDP01/MIR/CONS/00055/1/004  
Comment Method: EMAIL  
Customer Type: Local Public Body

Verbatim Comment:
The Strathard area currently has a reasonable diversity of housing. The community council notes the continuing proposal for additional housing at (H1); however any development here requires coordination with Stirling Council’s flood risk works and consideration of access over a single narrow listed bridge. Strong local objections have previously been made to any expansion of new housing here, and despite inclusion in the current local plan no development has yet been proposed. Other potential gap site housing development also needs to be identified. The town would also benefit from more rental accommodation and medium size owner-occupied quality housing for families and for retired couples. This would also help support the retail businesses in the town and help sustain the infrastructure to support a year round local economy and the local school and health centre.

Propose: Support gap site housing. Remove the proposed H1 development. Investigate and/or provide for the identification of suitable alternative sites for housing development.

The Main Issues Report highlights the changing demographic profile of those who live in the National Park; on page 54, the report states the need for smaller local care homes and goes on to promote the National Park’s commitment to including this aim in the Development Plan. However, it is not clear from The Main Issues Report how the current proposals suggested for the Strathard area will result in greater care for its growing elderly population. LLTNP should clearly demonstrate its commitment and care for its elderly in the final development plan with specific proposals for the Strathard area. Long term planning is required to prepare for the ageing population in terms of housing, health and care facilities.

Propose: Identify site for small local care home and collaborate with service and infrastructure providers in care for the elderly.
It would be logical to assume that any U.K. National Park Authority would have as its raison d’etre protection of the environment in the area that it covers. Indeed, our own Loch Lomond and Trossachs National Park Authority states on its website that one of its primary objectives is ensuring our natural heritage, land and water resources are sustainably managed and protected. It is perhaps somewhat surprising, therefore, that this same Authority is currently considering destroying a significant area of forest close to Port of Menteith in Stirlingshire, in order to erect 40-50 holiday lodges.

While the deforestation alone would be of significant concern to anyone with a degree of environmental awareness, it is confounded by the fact that this particular area is home to a number of protected flora and fauna, including red squirrels, pine martens and wildcats. Given that some of these species are in significant decline, and there are few remaining areas where they can be naturally seen, it is inconceivable that the National Park can even contemplate developing this site, particularly given that each of the aforementioned animals are protected under the Wildlife and Countryside Act 1981, which makes it an offence to damage, destroy or obstruct access to any structure or place which a red squirrel, pine marten or wildcat uses for shelter or protection, or to disturb any of these species when it is occupying a structure or place for that purpose. How demolition of this large area of forest can circumvent the law, remains to be seen.

In addition, several feeder streams, flowing directly into the Lake of Menteith, run through, or close by, the proposed development area, and these are designated as Sites of Special Scientific Interest (SSSIs). Similar to the devastating effect this proposed land redevelopment will have on the protected animal species, there will be a significant decline in both unique plant life and associated attracted butterflies, moths and birds.

In view of the enormous detrimental environmental effects these plans are likely to incur, one may wonder why the National Park Authority may even consider them; the answer is to promote local tourism in Aberfoyle. Given that this development is actually proposed for Port of Menteith (a small rural community with no businesses likely to benefit from increased visitor numbers), it seems that we locals are suffering ‘all pain and no gain’; indeed, several B&Bs and self-catering accommodation within Port of Menteith are themselves likely to experience a substantial loss of business if this proposal is approved. Even if tourism is increased within Aberfoyle, it is still highly questionable whether ‘the end justifies the means’ when there is an undeniable ‘knock on’ effect on a variety of protected species which are already in significant decline.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
The area behind the David Marshall Lodge MIR 3. Due to it's close proximity to Aberfoyle it would guarantee an increase in footfall and thereby achieve the aims that have been identified via the 2013 charrette and discussions with the community council.

Our response relates to land under our ownership at the existing FCS Aberfoyle Yard which has been identified as potential allocation MIR3 - Business with a particular focus on enhancing the economic activity of the area. FCS is actively working with LLTNPA and others to take forward these developments comprising a ‘Rural Activity Area’ alongside a reconfigured yard premises (subject to suitable access and development taking account of localised flood risk). FCS is keen to endorse our proposed site for continued inclusion in to the Proposed Plan and subsequently then the LDP itself.

We continue to support the rural economy and development of the area and see this site as significantly contributing to this, to that end FCS would not hesitate in working with you to further these sites.
Having looked at the Aberfoyle Section of the Main Issues Report, my immediate comment is this:- what Aberfoyle needs is housing and NOT yet more self catering accommodation. Having done my own research I have discovered there is already over 600 self-catering beds available in the area around Aberfoyle along with several large hotels and many other properties which are second homes. At this rate there will be more visitors that residents in the area. We want a vibrant community of people that live here on a permanent basis, rather than properties which are only used occasionally.

I don’t know who is driving this plan for visitor accommodation, but I would ask do they believe the community really wants and needs it. Certainly this was not supported by the residents at the charrette when less than 20 people attended. There have also been reports in the Stirling Observer of the lack of residential accommodation, this is more pressing than holiday lets.
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.2 Aberfoyle

Customer Reference: 00213
Customer Name: Stirling Council
Organisation: Stirling Council
(If applicable)
Comment Reference: LDP01/MIR/CONS/00213/1/005
Comment Method: EMAIL
Customer Type: Local Government

Verbatim Comment:
The options for Aberfoyle include housing and tourist development at the edge of the settlement which are not connected to the village centre by footways. For safety and access reasons, new development at such locations would need to ensure safe walking (and preferably also cycle) routes back into the village either through the provision of road side footways or off-road routes.

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.2 Aberfoyle

Customer Reference: 00082
Customer Name: Derek Flaherty
Organisation: (If applicable)
Comment Reference: LDP01/MIR/CONS/00082/6/001
Comment Method: EMAIL
Customer Type: Individual Resident

Verbatim Comment:
1. As an occupant of Port of Menteith, our house backs directly on to the National Park and the proposed boundary of MIR 4 looks as if it lies adjacent to our property. Can you please confirm the approximate distance from the boundary of our property to where these buildings will be? At the moment, there is a small pathway directly behind our house, and it looks as if your proposal leaves this intact with another area of woodland behind before the proposed area for the lodges - is this correct?

2. Are the lodges all likely to be sited close together in one part of the proposed development area or will they be widely spread throughout?
<table>
<thead>
<tr>
<th><strong>Customer Reference:</strong></th>
<th>00121</th>
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<tbody>
<tr>
<td><strong>Customer Name:</strong></td>
<td>Forestry Commission Scotland</td>
</tr>
<tr>
<td><strong>Comment Reference:</strong></td>
<td>LDP01/MIR/CONS/00121/1/002</td>
</tr>
<tr>
<td><strong>Comment Method:</strong></td>
<td>EMAIL</td>
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<tr>
<td><strong>Customer Type:</strong></td>
<td>Key Agency</td>
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</table>

Our response relates to land under our ownership at site at Braeval which has been identified as potential allocation MIR4 -Tourism uses respectively with a particular focus on enhancing the economic and self-catering activity of the area. FCS is actively working with LLTNPA and others to take forward this development comprising holiday lodges within the Braeval forest to augment the visitor accommodation facilities and experience of the area. FCS is keen to endorse our proposed site for continued inclusion in to the Proposed Plan and subsequently then the LDP itself. We continue to support the rural economy and development of the area and see this site as significantly contributing to this, to that end FCS would not hesitate in working with you to further these sites.
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.2 Aberfoyle

Customer Reference: 00130
Customer Name: John Ingleby
Comment Reference: LDP01/MIR/CONS/00130/1/001

Organisation: (If applicable)
Comment Method: EMAIL
Customer Type: Individual Resident

Verbatim Comment:
Do not agree with the proposal to make this area a site of development because:

1. It threatens the quantity of water that flows in the SSSI. Burns which rise in or flow through the area. This water is essential for the provision of water for livestock and people on this farm and other properties in the area.

2. It threatens the quality of water as a result of tainted run-off. The disposal of sewage does not appear to have been considered before the proposal was put forward.

3. Wildlife would equally be affected by any water deterioration.

4. There is no evidence of a strong demand for more self-catering houses in this area.

5. The proposed development would be an eyesore.

6. The proposal fails against all the four aims of the Park. A very important point against this proposal is the potentially disastrous affect it would have upon the Lake of Menteith. The lake is home to the premier fishing venue in Scotland. It provides full time employment for three people and attracts some 14,000 patrons a year. The Lake and feeder burns are an SSSI which is strictly monitored by both SEPA and SNH. The feeder burns that flow from the proposed site are of modest size but are absolutely crucial to the Lake and its business. The Park stated at the last minute meeting in the Port on 2nd July that the SNH and SEPA had approved the designation of the site. It seems inconceivable that these two bodies would countenance the potential devastation of a prime venue for the sake of a development which has no relevance to the community of the Port of Menteith. MIR4 should be removed completely from consideration for a long term plan.

The proposal for MIR4 seems to have come about as a result of a desire of the Park and the businesses of Aberfoyle to enhance the amenities of the town and provide some extra holiday accommodation which may increase the footfall in the town.
Main Issues Report Our Live Park Comments Received

The proposed site is not on the edge of the golf course and the entrance is two and a half miles from the centre of Aberfoyle. It is Aberfoyle that needs the appraisal.

1. Alternative sites within walking distance of the town centre were suggested at the meeting of 2nd July. These should be thoroughly investigated. MIR4 will have been excluded from any future Plan.

2. Funds should be applied in improving the car parking and smartening up the various unwelcoming and underutilized sites.

3. If the bridge is a hindrance to development on the South of the river why not consider remodelling it?

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Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.2 Aberfoyle

Customer Reference: 00187
Organisation: SEPA
Customer Name: (If applicable)
Comment Reference: LDP01/MIR/CONS/00187/4/070
Comment Method: EMAIL
Customer Type: Key Agency

Verbatim Comment:
Adjacent to Old Kirk Loan (H1 Local plan site)

Surveyed flood level from 2006 event (1 in 40 year) of 20.343mAOD on opposite bank of the River Forth.

N/A
5 Placemaking - What sites should be considered for development? >> 5.2 Aberfoyle

Braeval - multiple watercourses through site

Surface water flooding of the A81 from the Braeval area has been highlighted by Stirling Council.

We would require a FRA for the site to assess flood risk from the numerous small watercourses. Any watercourse crossings should be designed appropriately to convey the 1:200 flow and surface water mitigation measures should also be considered.
5 Placemaking - What sites should be considered for development? >> 5.2 Aberfoyle

A small watercourse flows on the boundary of the site and enters a culvert under the A821. Culverts are prone to blockages which can exacerbate localised flooding. Stirling Council have highlighted that there is another small watercourse within the site however this isn’t demonstrated on the OS 1:10000 map and as such we would need clarification of the location and route of this watercourse. We would require a FRA for the site to ensure that any development is located outwith the 1:200 year functional floodplain of both the small watercourse and the River Forth. An FRA has been provided and further clarification is needed.
We require a FRA to assess flood risk at this site as the site is partially within the IRCFM flood boundary. The site is at the bottom of a steep slope therefore there may be a risk of flooding from surface water runoff. We recommend that appropriate mitigation measures are considered within the FRA to reduce the risk of flooding from this source.
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.2 Aberfoyle

Customer Reference: 00187
Customer Name:
Organisation: SEPA
(If applicable)
Comment Reference: LDP01/MIR/CONS/00187/4/066
Comment Method: EMAIL
Customer Type: Key Agency

Verbatim Comment:
Car Park off Main Street Not Wool centre Aberfoyle

Records of flooding in 1998 when the Allt a Mhangam Burn burst its banks upstream at Aberfoyle Motors. Flood water flowed down Lomond Court and through the site before re-entering the watercourse.

We cannot support development of this site as it is historically a flow path for flood water as indicated in the additional information. Development of this site will impact on the flow path and not only will the development itself be at risk of flooding but it will increase the risk elsewhere which is contrary to SPP.

Remove from Plan: Yes
In considering the MIR, the Stirling Council Planning Service has focussed on the settlements in close proximity to the planning authority boundary which are most likely to have impacts on the area. In terms of settlement specific proposals for Aberfoyle, Croftamie, Drymen and Killin we have no particular concerns, provided infrastructure constraints required for development are addressed.
I want to register the strongest objection to this part of the plan. Safeguarding the area was assured by the SSSI for all the environmental reasons that will be being submitted by our concerned neighbours. We support these views and have contributed to them.

This site is too far from Aberfoyle for a short walk and hundreds of visitors will take to their cars, find parking and services lacking in Aberfoyle and drive away to other centres.

The holiday accommodation must be sited nearer to Aberfoyle; there are FC areas to exploit south, west and north of the village, for innovative building.

Local people must be better served by development within the boundaries of Aberfoyle, not having to compete with "holiday" lets which have killed many a West Country village.

From a wider scale than your out-of-date aerial photographs of the Braeval forest area shows, the view of the Menteith Hills from across the Moss will be spoiled. It will be a housing estate, with street lights, degrading the ambience of wild habitat that the current policies of the Nat Park seek to protect.

As members of the John Muir Trust, and the National Trust for Scotland, and as a family, dwelling since 1881 in Port of Menteith we seek to defend any area, such as this, from misguided development. The social and natural history of this area depends on conservation and restoration for the valuable contribution it will always make for future generations of human, flora and fauna. The proposed development at Braeval, for Aberfoyle's economic benefit will not be the answer you seek. It is the wrong place.
As direct employment in Forestry has declined there is a need to encourage new business and industry to the area. We welcome the potential development site (MIR3) at Aberfoyle and would request that the National Park actively promotes this proposal with Stirling Council and other stakeholders.

Propose: Develop a new Business and Industry site at MIR3.
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.2 Aberfoyle >> 5.2.1

Aberfoyle Question 1: Do you agree with the preferred option? Why?

Customer Reference: 00090
Customer Name: Sheena Makgill-Crichton
Comment Reference: LDP01/MIR/CONS/00090/1/001

Verbatim Comment:
This proposed site of development does not lie within the area of Aberfoyle it lies within Port of Menteith. It is within the catchment area of the Lake of Menteith with potential effects on the water quality of the Lake and the successful Fisheries thereon.

There is already an excess of capacity for Self catering accommodation within Port of Menteith all of whom struggle to maintain a level of occupancy.

The infrastructure required for a project like this would be huge. We already struggle with services as it is. A modern development would require modern services, even with Step Change we know that we will not be able to get next generation Broadband, adding in more requirement at the extreme of the exchanges limit would not only be a bad connection for the development but would yet again drain speed away from local residents and businesses.

This is all counter productive to Port of Menteith's ability to encourage small businesses and allow them to function in the area. If Aberfoyle requires more tourist accommodation to produce more commercial trade for the village, they should look to enhancing the facilities in the village first, including things like tennis courts etc and then look to find an area nearer Aberfoyle rather than in Port of Menteith.
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.2 Aberfoyle >> 5.2.1

Aberfoyle Question 1: Do you agree with the preferred option? Why?

Customer Reference: 00093  Organisation: Scottish Natural Heritage
Customer Name: (If applicable)
Comment Reference: LDP01/MIR/CONS/00093/1/013  Comment Method: OLDP  Customer Type: Public Body

Verbatim Comment:
Yes - MIR 4 is potentially a good location for small scale self-catering lodge style accommodation, although we would hope that a detailed analysis of the landscape sensitivities and landscape capacity will determine the final scale of the development that is appropriate. We note that the Rob Roy Way provides off road access to Aberfoyle but, in practice, visitors are likely to use the A81 so it may be sensible to consider whether a safe off road path network is needed adjacent to the trunk road, at least to where it joins the A821 at the Rob Roy Motel. Opportunities to make a circular off road network could also be explored. Given the scale of the development site, we suggest that there are opportunities for significant gains in habitat diversity through native woodland planting.

The boundary of the Lake of Menteith Site of Special Scientific Interest (SSSI) overlaps with this allocation because it is drawn around a number of tributaries of the Lake that snake northwards through the forest. The Lake of Menteith is important because it supports a population of Slender Naiad (a rare plant that is a European Protected Species) and a range of other plant species than depend on water that contains moderate amounts of nutrients. The Lake is currently in unfavourable condition with respect to these features and therefore any proposed activity that would potentially increase nutrient loadings to the water body require careful consideration.

Potential impacts from this proposal could include:
- Construction site activities - at the construction stage a number of activities have the potential to pollute watercourses, including felling of trees, construction of roads and disturbance of soil, in addition to use of potentially polluting substances, such as concrete and paint.
- Wastewater and surface water drainage (i.e. water running off roads etc.) once the site is built - septic tanks may contribute considerable loadings of nutrients to water bodies and even when properly maintained, nutrient loadings from them would be expected.

Through careful design and mitigation measures, it should be possible to avoid impacts on the SSSI. However, given its importance we would suggest that if this site is to be taken forward in the plan, further joint working with SEPA, FCS and SNH will be required to ensure that potential impacts can be avoided. This should include a review of the number of chalets proposed if necessary.
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.2 Aberfoyle >> 5.2.1

Aberfoyle Question 1: Do you agree with the preferred option? Why?

Customer Reference: 00096
Customer Name: Cardross Holiday Homes
Comment Reference: LDP01/MIR/CONS/00096/1/001
Comment Method: OLDP
Customer Type: Private Business

Verbatim Comment:
We are the owners of Holiday accommodation based near Dykehead and rent out holiday cottages. There is an abundance of holiday cottages and chalets in the Port of Menteith area. After a difficult 2 years due to the recession we are now all just beginning to experience a recovery in interest and bookings. Even so, we and other owners of holiday properties in the area rarely achieve full occupancy.

The Braeval plan for 50 Holiday Chalets will cause excess and unnecessary capacity in this market and will adversely affect our own bookings. Surely the Forestry Commission is supposed to be concerned with forest regeneration for both commercial and public amenity provision. Why should they be enabled to dabble in property speculation at our expense. I strongly resent this proposal and ask you to reconsider and drop it.
For a number of reasons this development is in the wrong location: The site suggested is in an undeveloped part of the QE Forest park and to put the chalets there would involve destroying the unspoilt nature of the place; the very thing you are using to attract visitors. This seems a self-defeating move.

Also the upheaval would disturb the associated wildlife which include a number of unusual and rare species. There is also the point that the site is fully in the catchment area of the Lake of Menteith. The burden of the associated drainage would further weaken the fragile nature of the lake's eco-system, which is protected by an SSSI.

A smaller but important point is that describing this development as Braeval is misleading as it is well beyond Braeval, and it is nowhere near Aberfoyle which it is supposedly serving.
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.2 Aberfoyle >> 5.2.1

Aberfoyle Question 1: Do you agree with the preferred option? Why?

Customer Reference: 00107
Customer Name: Non Attributable
Comment Reference: LDP01/MIR/CONS/00107/1/020
Comment Method: ONLINE

Verbatim Comment:
Forestry Comm lodges overkill will damage existing self catering long term small businesses

Customer Reference: 00111
Customer Name: Maisie Martindale
Comment Reference: LDP01/MIR/CONS/00111/1/001
Comment Method: OLDP

Verbatim Comment:
I think the proposed development at Braeval is just wrong on so many levels. It will be detrimental to the Port, and provide little or no benefit to Aberfoyle. I agree with all the points raised at the recent meeting (2nd July 2014). Aberfoyle has to become a destination people want to travel to, and spend time in. At present that is not the case. The negative impact on the environment, of up to 50 lodges, cannot be underestimated. I hope this proposal is abandoned and further sites looked at.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivempark.com
Strathard Community Council welcomes the proposal to improve and develop the main street (PP1) in Aberfoyle. However, it is difficult to see how LLTNP could encourage development in the main street whilst promoting the view that it is at significantly higher risk of flooding than other neighbouring towns. The Community Council strongly requests that recent work by Stirling Council and the risk reduction strategies which are currently being planned for this part of the National Park are considered before drawing up the final local plan and that greater care is taken when agreeing the text of any commentary about the town. Similarly, the Community Council welcomes proposed improvements to the riverside car park; these should be encouraged in the context of planned flood risk strategies for this area and improvements to the quality of the riverside generally for walkers, cyclists and other visitors. It is also essential that any improvements increase the number of parking spaces available in the town and that these improvements seek to integrate the car park with the town as a whole.

Propose: All improvement work in Aberfoyle Main Street and car park to be planned in collaboration with Stirling Council and integrated fully with the current flood prevention programme.
The proposal to build 40-50 lodges within the National Park in Port of Menteith is nothing short of environmental suicide. This is an area of outstanding beauty, and is haven for wildlife, including numerous protected species (e.g. red squirrel, pine marten); there is no doubt that the enormous disruption caused during construction of these buildings, in addition to the noise and activity once they are occupied, will result in displacement of a great number of these animals. It also looks as if the construction work will be very close to the feeder stream for the Lake of Menteith, and this stream is designated a Site of Special Scientific Interest. It is simply not acceptable to destroy large segments of this area merely to increase profitability in Aberfoyle. If the intention is to proceed with this work, it would be more acceptable to position the lodges in the existing yard area (MIR 3) as this is already 'built up' and would have minimal effects on the environment.

I would urge a re-think over this proposal - it is not something the inhabitants of Port of Menteith are going to accept with a huge fight.
Aberfoyle Question 1: Do you agree with the preferred option? Why?

This particular area proposed for the holiday lodges is home to a number of protected flora and fauna, including red squirrels, pine martens and wildcats. Given that some of these species are in significant decline, and there are few remaining areas where they can be naturally seen, it is inconceivable that the National Park can even contemplate developing this site, particularly given that each of the aforementioned animals are protected under the Wildlife and Countryside Act 1981, which makes it an offence to "damage, destroy or obstruct access to any structure or place which a red squirrel, pine marten or wildcat uses for shelter or protection, or to disturb any of these species when it is occupying a structure or place for that purpose". Can you please explain how you are planning on circumventing this law?
From a rural economy perspective, it is hard to see how the proposed development site at Braeval will support the economy or community of either Aberfoyle or Port of Menteith. The site is too far from Aberfoyle for that to be a realistic outcome. Larger tourism developments of the scale proposed tend to develop their own tourism infrastructure and/or visitors bring their provisions with them.

In terms of job creation potential of the site itself, this will compound an existing problem in the area of a shortage of labour market supply for seasonal entry level tourism jobs.

What is needed for the Park is tourism developments that will support an extended tourism season, improve the quality of job opportunities available. This will either be achieved through smaller tourism accommodation developments or through supporting developments that add value/add to the attractiveness of existing sites.

Regarding the Forestry Commission workshop area, as an immediate neighbour we would be supportive of activities that were in keeping with current forestry type activities (possibly developing new forestry related activities such as biomass). However, we don’t think it appropriate for an out of village business centre to be built there.

In terms of what we would like to see happening in Aberfoyle, a community/business hub in the centre of Aberfoyle (possibly in partnership with the Visitor Information Centre) would be the most sustainable, and logical development option which would support our rural economy. A hub with all the facilities of a business centre, without the overheads of built office space.

From a practical perspective, this location is much closer to the BT exchange than the FCS site, which would mean better quality broadband, when Next Generation Broadband finally arrives.
5 Placemaking - What sites should be considered for development? >> 5.2 Aberfoyle >> 5.2.1

**Aberfoyle Question 1: Do you agree with the preferred option? Why?**

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Verbatim Comment:

No I do not agree with the preferred option for the following reasons:

The proposed lodges will be out with Aberfoyle and therefore it is more likely that visitors will choose Callander as an option for eating, shopping, leisure and any other touristic activity. Aberfoyle does not offer enough quality options for any of the above. Indeed, visitors will continue to enjoy cycling, walking and picnics by the lochs - this does not generate more income for Aberfoyle.

The lodges should be within a short walking distance from Aberfoyle rendering it necessary to visit / pass through the town.

Furthermore the aforementioned dining, leisure and shopping experiences need to be improved within Aberfoyle in line with this proposal. I strongly believe that building the lodges on this site will have a non significant effect on the local business of Aberfoyle.

Indeed I am supportive of the fact that bringing in more visitors to the area will be a positive step, however we must also make the necessary improvements to justify attracting more people to this area.

I am strongly against the destruction of our woodland which supports a number of varied flora and fauna including red squirrels, pine martins, adders and wild cats.
5 Placemaking - What sites should be considered for development? >> 5.2 Aberfoyle >> 5.2.1

Aberfoyle Question 1: Do you agree with the preferred option? Why?

Customer Reference: 00145
Customer Name: Scottish Water
Organisation: Scottish Water
(If applicable)
Comment Reference: LDP01/MIR/CONS/00145/1/010
Comment Method: EMAIL
Customer Type: Key Agency

Verbatim Comment:
Further Discussions Would Be Required To Take Place In Relation To The MIR 4 Site For 40-50 Lodges And Early Engagement With Scottish Water Would Be Recommended Should This Site Come Forward For Development.
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.2 Aberfoyle >> 5.2.1

Aberfoyle Question 1: Do you agree with the preferred option? Why?

Customer Reference: 00177
Customer Name: Laura Wray
Comment Reference: LDP01/MIR/CONS/00177/1/001

Verbatim Comment:

OBJECTION BY LAURA WRAY, ADVOCATE, PORT OF MENTEITH TO PROPOSED DEVELOPMENT BY THE FORESTRY COMMISSION AT PORT OF MENTEITH. I am writing to object to the application by the Forestry Commission to build 50 chalets near Port of Menteith. Others have objected on the basis of conservation and environmental concerns however my objection is purely legal. My objection is on the grounds that the proposal is contrary to (i) the aims and strategy of the National Park; and (ii) to the policies set out in the National Park Local Plan, as I have set out in some detail below.

THE STATED DEVELOPMENT STRATEGY IN THE LOCAL PLAN. The Development Strategy as set out in the Local Plan at 3.3, states that the Park wishes to attract investment into the tourist sector "in a sustainable manner, promoting higher quality facilities and experiences in keeping with the capacity of the Park’s resource base and adhering to the principles of the National Park’s recently attained European Charter for Sustainable Tourism".

Opportunities for large scale tourism are specifically identified in the Local Plan at Callander, with potential sites at Balloch, Drymen and Arrochar and Tarbet. However elsewhere support will be given to tourist developments in accordance with the "aspirations of the Destination Development Frameworks that cover the six different visitor destinations in the Park. Support will be given to high quality development that is in keeping with the special qualities and the carrying capacity of each area."

THE STATED LOCATIONAL STRATEGY IN THE LOCAL PLAN - ‘SETTLEMENTS’, ‘SMALL RURAL COMMUNITIES’ AND ‘COUNTRYSIDE’
The 'Locational Strategy' of the Local Plan divides up the areas within the National Park into 'Settlements', 'Small Rural Communities' and the 'Countryside'. Balloch and Callander are identified as larger Settlements where significant tourism investment will be supported. Aberfoyle is identified as a smaller Settlement along with Arrochar, Gartmore, Killin, Crianlarich etc where some tourism investment would be supported.

However Port of Menteith is defined as a 'Small Rural Community' where the stated development strategy is for 'Small scale tourism, recreation, economic and community development.' The Plan refers to 'a flexible approach to small-scale development' within 'Small Rural Communities'.

Into which category does the site of the proposed development fall?
The site of the proposed development is certainly not in Aberfoyle, so the rules relating to 'Settlements' are not applicable. It is mentioned in the Local Plan that the boundaries of some 'Small Rural Communities', such as Port of Menteith, are not defined - accordingly the location of the proposed site may fall within the definition of "Countryside" where any tourism development is even more restrictive than in the 'Small Rural Communities'.

The Local Plan allows support in the 'Countryside' for 'tourism in areas that are capable of supporting some additional development and a moderate increase in visitor numbers'.

In short, whether the location of the proposed development is defined as being within the 'Small Rural Community' of Port of Menteith or in the 'Countryside', any development allowed in terms of the Local Plan would have to be small scale. Accordingly the proposed development of 50 chalets does not comply with the Locational Strategy in the Local Plan.

STATED TOURISM POLICIES IN THE LOCAL PLAN. Under 'Sustainable Tourism and Recreation' at 3.7 of the Local Plan, several Policies relating to Tourism are specified.

POLICY TOUR 1. The first of these, TOUR 1 relates to New Tourism Development. The Local Plan gives the reasons for the policy as follows:-

Reason for policy. Policy TOUR 1 supports tourism development within and adjacent to settlement boundaries where it will complement existing provision, utilise existing services and provide increased economic benefits for local communities and businesses.

It is stated that tourism will be supported within 'Settlements' or in sites identified in Schedule 4. The Local Plan states:-'Opportunities for larger-scale tourism developments at strategic locations are identified in Schedule 4 and these are expected to deliver the majority of new tourist development throughout the Park. By directing major tourism investment to these areas, the policy aims to guide investment into the Park and safeguard the more sensitive countryside areas from potentially damaging tourism developments.'

Whilst Aberfoyle is a 'Settlement', Port of Menteith is not, and arguably the proposed development is within the 'Countryside' as I said above.

Schedule 4 lists the tourism development sites identified for large scale tourism developments e.g. Balloch, Tarbet, and Callander etc. It is of significance that Aberfoyle, although a 'Settlement', is not mentioned in Schedule 4. Accordingly in terms of the Local Plan, the National Park Planners themselves have not identified any need for a large scale tourist development in Aberfoyle, never mind Port of Menteith or the countryside outwith Port of Menteith.

Given the number of potential sites identified in Schedule 4 it is disappointing that the Forestry Commission do not see fit to make proposals to develop one of these other sites identified by the National Park Planners as being suitable for development, rather than the proposed site.

For any tourism development not located in a 'Settlement' or identified in Schedule 4, Policy TOUR 1 states:- 'Proposals located outwith the settlements and Schedule 4
sites will be supported where they accord with the strategy and local destination requirements identified in Schedule 5.'

Schedule 5 states that 'Tourist development should help deliver the visitor management strategy identified for each sub destination area.' The 'sub destination area' in which the proposed development is located is 'Callander, Queen Elizabeth Forest Park and The Trossachs.' The "Tourism Opportunities/Constraints" for this sub destination area identified as follows:- 'Support for visitor facilities and improvements to retail, food and drink facilities in Callander, and extended range and quality of visitor accommodation.
Support for visitor infrastructure and small-scale self catering, bunkhouse, camping opportunities within Queen Elizabeth Forest Park area around Aberfoyle and the Trossachs.'

The proposed development is not within Callander and is not a small-scale self catering, bunkhouse or camping site.

Accordingly it does not accord with the strategy and local destination requirements identified in Schedule 5.

If a proposal does not comply with Schedule 5, the Local Plan states: 'Where a proposal does not accord with these principles, support will only be given:
(a) in very exceptional circumstances' or
(b) where it is small-scale development associated with a farm or existing business diversification project in an existing small building grouping.'

Clearly the proposal for 50 lodges is not a small-scale development nor are there any special circumstances to justify it being allowed in breach of the Local Plan. Indeed as other objectors have identified there are numerous conservation and environmental issues which would amount to "special circumstances" entitling the National Park to reject the proposal.

In short the proposed development does not comply with Policy TOUR 1 and should be rejected.

POLICY TOUR 2 makes it clear that 'Developments must be carefully located, sited and designed to ensure it does not compromise the special qualities of the Park and in particular fragment important features.'

It is submitted that even apart from the fact that the proposed development does not comply with Policy TOUR 1, the proposed development would also be in clear breach of Policy TOUR 2 for the conservation and environmental reasons highlighted in other objections.

'POLICY TOUR 3.' This policy related to 'Enhancing and Safeguarding Existing Tourism Sites'. The National Park is committed growing a 'more robust rural economy'. A development on this scale is likely to undermine existing holiday cottage tourism businesses who have had to comply with the National Park Local Plan for very small scale development. Accordingly the proposed development is in breach of Policy TOUR 3.

CONCLUSIONS

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
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1. The terms of the Local Plan are clear and unequivocal and do not support the proposed development. From a locational point of view the proposed development is not on a site identified by the National Park Planners as suitable for large scale development nor is it in a Settlement where development might be considered. The site is either in a 'Small Rural Community' or in the 'Countryside' where only a very small-scale development would be supported by the Local Plan.

2. Further the proposal does not comply with Policy TOUR 1, Policy TOUR 2 or POLICY 3 and as such is in breach of the National Park’s own policies for Tourism.

3. The fact that this development is proposed by a Public Body such as the Forestry Commission is of concern. Developments by Public Bodies and small private businesses must operate on the same level playing field. The proposal by a Public Body that they should be allowed permission for a development which is contrary to the Local Plan and which would not be granted if it were proposed by private individuals is downright anti competitive and would amount to a breach of Competition Legislation.

4. Further the fact that Public Body would be using public funds to pay for that development to the detriment of other existing and upcoming small businesses in the Park is contrary to the Park’s aims and objectives of growing the rural economy and supporting existing businesses and is in breach of policy TOUR 3. The Park cannot allow other public bodies to do what they like to the detriment of existing small businesses.

5. If the proposal for 50 chalets is allowed despite being in breach of the clearly stated policies in the Local Plan, then such a decision would be open to Judicial Review.

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.2 Aberfoyle >> 5.2.1

Aberfoyle Question 1: Do you agree with the preferred option? Why?

Customer Reference: 00179
Customer Name: Jane Jones
Comment Reference: LDP01/MIR/CONS/00179/1/002

Organisation: (If applicable)
Comment Method: EMAIL
Customer Type: Individual Resident

Verbatim Comment:
The other comment I would make is that the car park and main street of Aberfoyle have already been improved at least twice in the recent past and it would be more to the point to spend money on trying to do something about the flooding rather than wasting yet more money on the cosmetic appearance of the village. In the longer term flooding does more damage to businesses.
I do not agree with the proposal MIR4 that suggests the development at Braeval, Port of Menteith, of self catering accommodation. My reasons are that I think this is an unsuitable site for such a development as it contains streams that are designated triple SIs and in particular because one of these streams is fundamental to the operation of the Port of Menteith Fisheries and any pollution of this watercourse could compromise the operation of this successful and well known attraction.

Also, the development would compromise the legally protected plant and animal species at Braeval. A development that could potentially accommodate between 500 to 600 persons at any one time would cause significant damage to the streams, the flora and fauna and the wildlife in that area. It may also damage the business of the Port of Menteith Fisheries and it could also damage existing self catering businesses in the area -some of which are not strictly within the National Park boundaries but which serve visitors to Aberfoyle and Callendar. The entrance/exit to the road at Braeval is arguably at the most dangerous point of the road and the increase in traffic at the point could cause accidents unless major roadworks were to be undertaken - something which is a matter for Stirling Council's roads Dept and in the current economic climate, unlikely to happen. I believe the site is too far from Aberfoyle to be of significant benefit to the businesses in that town. Indeed it is not in Aberfoyle - it would be in Port of Menteith. As it would not be within walking distance, and as the attractions of Aberfoyle are limited, I don't think persons in the site would be inclined to spend much time (or money) there, choosing instead to go touring and spending money elsewhere. There is no doubt that Aberfoyle is in desperate need of development - it is not a particularly attractive or interesting visitor destination but this development is not the answer. To compromise elements of the Port of Menteith area to serve the needs of a handful of businesses based in Aberfoyle cannot be right. If more accommodation is the answer to Aberfoyle’s problems then it should be within Aberfoyle itself (or at least within walking distance).

However, I do not believe that more accommodation is the answer at this time but instead would argue that the businesses within Aberfoyle should undertake joint marketing and improvements to their offerings in order to be successful, and if the authorities are able to fund developments to the centre to make it more attractive and create 'reasons to visit' then it should do that instead.
Various scheduled monuments are situated within the vicinity of the development, including SM 8106 Mondowie, cup and ring marked stones, which are not highlighted in the MIR, although it is unlikely to have significant impact on the setting of the scheduled monuments. Local archaeology is located within the site allocation. Application of national and appropriate local development plan policies should ensure any adverse impacts are mitigated.

What sites should be considered for development?

Aberfoyle - Delivering more affordable housing in this location should be a priority but the lack of feasible site options is noted. The land-owner’s intentions regarding the undeveloped allocated site at Old Kirk Loan remain uncertain. As the owner of the existing housing at Old Kirk Loan we, anyway, have some doubts about adding to the density of housing at this location.
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Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.2 Aberfoyle >> 5.2.1

Aberfoyle Question 1: Do you agree with the preferred option? Why?

Customer Reference: 00087
Customer Name: Adam Auckburally
Comment Reference: LDP01/MIR/CONS/00087/1/001
Organisation: (If applicable)
Comment Method: OLDP
Customer Type: Individual Resident

Verbatim Comment:
I do not agree at all with the proposed site for the development of 40-50 lodges in the Port of Menteith area you have highlighted - in fact I believe this to be a disgraceful suggestion. This is an area of outstanding natural beauty, much of which is designated as a SSSI due to the feeding streams that serve the Lake of Menteith. Additionally there is a small population of red squirrels and we have personally sighted pine martins and red deer within this area. This is not to mention all the other flora and fauna present in this area which would effectively be destroyed by 40-50 lodges being built here. I am somewhat surprised that this can even be proposed due to the SSSI designation of the whole area.

If the proposal is to increase the business within Aberfoyle, then please build the lodges in Aberfoyle. I do not see why the occupants of houses within the Port of Menteith area you have highlighted should be subjected to the disruption caused by building these lodges, or to the ongoing disruption caused by holidaymakers occupying these lodges. This proposal is beyond my comprehension in a protected area such as this. The residents of this area do their best to encourage the wildlife to flourish all of which will be in vain if this development proceeds. There are many more suitable sites within Aberfoyle - e.g. the yard you have suggested for industrial use on the outskirts of Aberfoyle (MIR 3).
### Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.2 Aberfoyle >> 5.2.1

**Aberfoyle Question 1: Do you agree with the preferred option? Why?**

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#### Verbatim Comment:

1. The Area marked for 45 - 50 holiday lodges is in Port of Menteith - NOT ABERFOYLE. Thanks to vigilance of friends locally we heard about this last week only.

2. The SSSI/SNH and indeed National Park policies assured us of a responsible future with regard to the National Heritage of the area and the Forestry Commission development plans seem to flout this trust under the guise of National Park principles.

3. Port of Menteith will NOT benefit from the proposed development at all, losing a forest buffer between the Menteith hills and the Main Road, with traffic, drainage pollution, light pollution, rare species we treasure, flora and fauna.

4. Threats to the remaining ruins of former settlements are obvious, already we have lost access to see many of these owing to private forest planning - we are forewarned of further landscape degredation.

5. This site is too far from Aberfoyle for a short walk to shops and services. 50 lodges equal MANY MORE than 50 cars and once in them holiday makers will drive away to other centres and Aberfoyle will miss out.

6. 50 lodges might well mean many more than 50 dogs - ruining the future safety of many species and upsetting the delicate balance so well worked towards by local conservation groups. What safeguards would the developers have to comply with SSSI statutes?

7. Waste Disposal - already unsatisfactory in the area. What chance of meeting a higher standard with rubbish all over the area.

8. Miles from the Menteith Hills, the view will be compromised. It will look like a housing estate on the slope with light pollution to match, or has the innovative developer worked out underground dwellings without this degradation.

I DO NOT SUPPORT THIS PROPOSAL FOR BRAEVAL.
One feels shocked at the upset of conservation measures hard won over many years. The sacrifice of nature is not justified. The local and international organisations will perhaps help common sense to beat the challenge of commercial gain. John Muir Trust etc.

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Aberfoyle Question 1: Do you agree with the preferred option? Why?

Verbatim Comment:
There is currently sufficient capacity at aberfoyle waste water treatment works to serve the H1 site for approximately 8 houses.
Valid demand - I am mystified as to where the perceived demand for extra accommodation has come from. The quoted survey by consultants would seem to be flawed. The current provision for self-catering accommodation in the area is ample. This has been backed up by discussions with local providers who find it difficult to fill the existing accommodation, this includes lodge type accommodation. It is also the view of Visit Scotland whose recent surveys indicate that the area of discussion has one of the lowest occupation rates in Scotland for self-catering accommodation. There are also existing approved planning applications for additional accommodation to be developed within Port Of Menteith and in nearby Gartmore. More self-catering accommodation is not needed.

Impact to local businesses - It’s all well and good that the National Park in promoting business development within the Park. But this current proposal will have limited impact on the businesses in Aberfoyle. This is due to the location being too far from Aberfoyle and of the type of visitor that will have limited spending power, and are more likely to eat etc in their accommodation, rather than visit Aberfoyle bars and restaurants.

The impact on existing self-catering businesses including those in Port Of Menteith should also be considered. As discussed above the current accommodation does not have high occupancy rates. The ones I spoke to, still have bookings available for the peak English school holiday weeks.

A development of this size would be able to afford much greater advertising space and professional websites, as the cost would be spread over a greater number of units. This would put existing accommodation at a further disadvantage. This could cause local businesses to close, in favour of one major player. Is that the aim of the Park? This proposal is not creating sustainable economical development for the existing businesses.

An alternative suggestion would be to allow limited expansion at existing lodge sites (such as Lochend Chalets or the Trossachs Holiday Park) or at existing family orientated accommodation sites (such as Forest Hills).

The Lake of Menteith Fisheries is a major attraction in Port Of Menteith. This fishery relies on the water courses from the proposed development area for their water supply to the Lake and more importantly to their breeding pools. If water is diverted away the breeding ponds will fail. If a single pollution incident occurs the breeding ponds will be affected. Loss of the fisheries will have a major impact on Port Of Menteith and the area. The fishery hosts national and international competitions, bringing...
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high spending visitors to the area. It also puts Port of Menteith and the Trossachs on the national and international map. I can’t over stress the importance of the fisheries to the local economy. The fisherman alone account for 14,000 visitors each year, additional family and friends are also brought into the area. The water supply is critical to the fishery and Port Of Menteith and must not be interfered with.

Infrastructure - The existing infrastructure is limited. This would significantly add to the costs for any development in this area. There’s no mains sewage. Mobile phone coverage is limited. Broadband provision is slow, if it is available at all. The power plant in this area is at its limit at the moment. I was going to install a ground source heat pump, but told by my power provider that I would have to finance power distribution upgrades. So a major investment in the power infrastructure would be required.

Environmental impact (noise, lighting, visual) - Visually there is no way of limiting the impact. Even if they are spread out in the forest, they will be visible. What’s more your wording for suitable sites demands an open outlook, so the lodges would be arranged to see the view and hence be seen. I was looking at the Port of Menteith website, in which one of the pictures on the homepage had a view of the lake with the forest in the background. This view would be ruined for the visitors to Inchmahome by this proposal. The lighting of the roads on the site and from the lodges would impact the dark nights that exists at the moment. The dark skies are important to night time wildlife and astronomers. I also have concerns that the noise created from the site would interfere with the tranquil essential nature of the forest at the moment. This would affect users of the forest including those walking on the Rob Roy Way and local residents.

Environmental impact (Flora and Fauna) - The watercourses within the forest are important to the lake of Menteith, so important that they are designated as SSSIs. The watercourses feed the lake of Menteith, where there’s a presence of a rare plant called slender naiad. Any pollution or change in the water quality will affect this plants ability to survive. The area of land identified for this proposal was not always a commercial plantation. In its history specimen trees have been planted. These should be protected. This includes some at the proposed entrance to the site. This will restrict the development of an entrance suitable for the volume of traffic that will need to access the site. The proposed area of development is also host to a number of protected species, some of which you are aware of and others that may come to light in an environment survey that would have to be produced. I’ve seen red squirrels, pine marten and bats in the vicinity. Also a respected entomologist who lived locally has identified a number of unusual butterflies in the area. There is an established adder colony within the proposed area of the development. These adders have a range over most of the site. This is shown by the discarded skins that can be found over a wide area of the site.

I’m a bit concerned regards the comments on your blog that ‘mitigation’ (defined as - the action of reducing the severity, seriousness, or painfulness of something) would be assessed at a later date. There is nothing that can mitigate for destroying protected wildlife. Reseating is still a loss to our environment and questionable whether the wildlife would thrive in an introduced area. To reduce the severity, seriousness and painfulness of this proposal would be not to do it.

Culture - There are several ruins within the area ear-marked for development. These sites should be properly investigated, recorded and preserved. They should also be kept in the proper context and not in the middle of a holiday park.

Access - The documentation also mentions that access for walkers and riders would need to be safeguarded for visitors and locals. The idea of walking or riding in or through a holiday park does not appeal. Any access to the footpaths should be maintained and necessarily at a substantial distance from any development, including the service roads, cars, manicured grounds, noise and sight of the lodges in order to preserve the forest atmosphere.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
Safety - With the presence of adders on the site there is a risk to any visitor, particularly where children are left unsupervised to play outside. The last death as a result of an adder bite in the UK was in the area (Callander). Adders also pose a threat to unsupervised dogs left to play outside. The use of barbeques in the forest at the proposed lodges will also increase the chance of forest fires, that will threaten life and property.
Non-compliance with the National Park’s aims - This proposal clearly is at odds with the National Park’s four statutory aims with regard to Port Of Menteith. To conserve and enhance the natural and cultural heritage, By disturbing, or to put it more strongly, killing protected wildlife and developing previously forested land. To promote the sustainable use of the natural resources of the area, By removing habitat for protected species and developing on non-developed land. Both of which is not reversible, not sustainable. To promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public, By destroying some of the special qualities of the park, including the tranquil nature and views. This shows a lack of understanding and is bound to reduce visitor enjoyment, as well as reducing enjoyment for locals. To promote sustainable social and economic development of the communities of the area. By putting small self catering businesses out-of-business, with the introduction of a major development.

Alternatives - The biggest issue is that the centre of Aberfoyle needs to be improved. This has been highlighted in every consultation or meeting regarding Aberfoyle, along with the flooding which has already had a detrimental effect on local businesses.

There tends to be a focus around the wool centre and little else. More walks starting and finishing in the Aberfoyle car park need to be created and promoted more strongly. Also improve the natural flow of visitors around more of the village. This would give more exposure to more businesses. Remove some of the low quality stalls and develop reasonable cost high quality outlets. Make outdoor activities more visible actually in Aberfoyle. Such as canoes/boats on the river or a zipped wire across the river.

What is needed is for there to be an attraction that will bring people to Aberfoyle. An attraction that will take up most of the day, so that they will stay overnight, if that is the aim of the Park’s development proposals. There are opportunities in the Aberfoyle area, such as a mountain biking trail. Such as an eco-friendly theme park on the lines of ‘Greenwood’ in North Wales (contact me if you want more details on this suggestion) or expansion of the Glendrick Roost animal rescue centre (this would also benefit the charity).

There were suggestions of promoting a craft area/village. There are many crafting folk locally shown by the shed at the back of the woollen mill, and the shop in Callander. This should be encouraged.
Encouraging more visitors to Aberfoyle should be the main aim of the plans for Aberfoyle (along with affordable housing and non-retail business property availability). The accommodation would grow to meet any increasing demands.

As discussed above an alternative suggestion, if more accommodation is required during the life time of the new local plan, would be to allow limited expansion at existing lodge sites (such as Lochend Chalets or the Trossachs Holiday Park) or at existing family orientated accommodation sites (such as Forest Hills).

More understanding of the visitors needs (not particularly those of certain vocal local businesses), would provide a more useful view as to what the visitor needs and is looking for when developing a strategy for increasing the number of visitors.

On another topic

Noise and danger from fast motorbikes, speeding or otherwise in the park is detracting from the natural tranquillity and general enjoyment of the park by the majority. The Park needs a universal speed restriction, with the exception of the few trunk roads through the park (such as the A82) similar to those in the Dartmoor National Park.

Final note

I feel aggrieved that I even have to raise this formal feedback as the desire was for development in Aberfoyle NOT in Port of Menteith. Indeed residents of Aberfoyle were notified via a flyer regarding the Aberfoyle charrette - we were not. There was no formal presentation of the plan or involvement of the local community council (Port Of Menteith CC). It was discussed with the Strathard community council despite this site and proposed development being not part of that council’s area. The residents of Port Of Menteith were lucky to find out at all, as the development was listed under Aberfoyle. Naturally residents looked for their local area and not necessarily adjacent areas.

It’s interesting to note that on your blog site there was no content before the Port Of Menteith development issues became apparent. It’s also interesting to see all the updates subsequently so hastily put in place on the website now list the development between Aberfoyle and Port Of Menteith. Previously there was no mention of Port Of Menteith. If there had been then local Port Of Menteith residents may have had the opportunity to be aware of this proposal and give feedback at an earlier stage of the process. It was suspicious at the local meeting how much emphasis was placed on convincing those present that correct consultation processes had been followed. I, along with many others, believe that this is not the case. My formal feedback is aimed at reducing the unnecessary work that would have to be done and cost to the Park, should this proposal be taken further before being rejected. I feel that at the moment the Park authority is going through the forward planning process ticking boxes and enduring the reactions rather than listening.

Time will tell.
Comments on the proposal for development of 40 to 50 family holiday houses at Port of Menteith.

1. The location is well outside the boundaries of Aberfoyle. It will be unlikely to attract visitors into Aberfoyle other than for a limited day type visit. It is not within walking distance and vehicle traffic is more likely to head to Stirling or Callander which have far better facilities.

2. Considerable infrastructure will have to be put in place for such a development. The installation of access roads water electricity and sewerage services will place a considerable impact on the environment and surrounding areas. Water run off from cleared areas given the terrain will need sizeable attenuation if erosion is to be controlled.

3. A development of this size will result in a reduction in numbers of visitors, ramblers who currently use the Forrest. It will mean a loss of the existing facility as they will not wish to walk through populated development.

4. The development would impact on the ecology of the area which has so far been protected by the National Park and Forrestry Commission. The Forrest currently has pine marten, red squirrel, water voles, Scottish wildcat, bats all of which will be lost.

5. The area includes water catchment for the SSI area which are protected. Having potentially up to 400 people in this area will give a serious risk of damage to the SSI itself and the flowers, butterflies, invertebrates which inhabit the area.

6. Any impact on the tributaries to Lake of Menteith will damage the fish stock causing considerable loss to income, loss of visitors to the Area and considerable adverse publicity to a fragile economy.

7. It is not clear that such a development has considered the impact on existing visitor holiday facilities including local hotels/ B&B's, motels and chalets. The studies so far carried out by the Park authority have been based on the proposal being in Aberfoyle and not in Port of Menteith.

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8. Alternative locations are available at Loch Ard, adjacent to David Marshall Lodge and at Callander which have far greater potential for attracting visitors. This type of development needs to be where there is best potential for use and not as a way of trying to attract visitors to an area that is best for day trip type visiting.

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Proposed build of 50 cabins between Braeval and Stonefield. My family have for 40 years own and run a self catering business in a wooded, waterside location approx 3 miles form the proposed site. Since the recession we have seen a decline in demand and have had to discount in order to achieve reasonable occupancy levels. A development of 45 lodges at the proposed site would have a damaging effect on existing self catering businesses in the local area.

I have read the report by Jura Consultants in which they suggest a development with 45 lodges catering for 360 holiday makers would be required for Aberfoyle to grow at 2.5% until 2020. I request to see the calculations for this report which you must supply under the freedom of information act. It will be interesting to see if writers of the report have looked at other future developments in the area. There is planning consent for 3 lodges very close to the proposed site and we at Lochend Chalets are planning to build 3 new 'best in class' lodges at the lake of Menteith. I understand that the old Covenanter's inn is at present being converted to self catering flats and I'm sure there will be more small scale development in the pipe line.

Stuart Mearns last year informed me that the park would support small, high quality self catering development and that a development on the scale of our present business (18 houses) would NOT be allowed. The Scottish government’s report of July last year states that self catering in Scotland is by and large well catered for.


The purpose of the proposed 'best in class' development is to attract more visitors to Aberfoyle but this is not going to make the park a better place to visit. Creating a 'best in class' Aberfoyle will make the park a better place. If MIR4 is developed, the location will NOT encourage its visitors to connect with Aberfoyle but travel to the better retail options in the east.

Why not develop several small scale developments in Aberfoyle. Here are my suggestions; - Flood proof houses - http://www.architecture.com/Files/RIBAPhysicalServices/CompetitionsOffice/Resultsbooklets/NorwichUnionFloodProofHouseoftheFuture.pdf Make the problem the solution! - Create a basin with house boats. - Small scale development near the Covenanter's, if the development is of a reasonable size then it should not overload the bridge. - Small scale development between the Village and the David Marshall Lodge. Having walked up there I can’t see why the topography is an issue. My real fear here is that MIR4 will not solve the problems of Aberfoyle. Attracting investment for MIR4 is the easy option. Attracting investment for the regeneration of Aberfoyle is what you should be tackling. What I see here is a new village which turns its back on Aberfoyle and is not fit for purpose.

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If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
I would like to object to the proposal to make the Braeval forest a possible site for 50 chalets in the Parks Strategic Plan. I am Fisheries Manager on the Lake of Menteith and was surprised to find that the Park were proposing a Development on top of the catchment area for the Malling Burn and its associated SSSI status. I am a supporter of the Park and through time I am sure the Park will help to develop the area as a Tourist Destination. With this in mind the development puts at risk the very attractions that it was created to promote and protect. The Lake is a world renowned trout fishery and hosts international fishing events as well as being home to the main national fishing events. We have 14000 angler visits annually. Living in the area and shopping in Aberfoyle for my fuel and groceries, I know how important tourism business is to Aberfoyle and I strongly feel that for this development to benefit local businesses in Aberfoyle (as per your planning strategy) it should be located closer to, and ideally within walking distance of the village.

As an aquaculturist and manager of the Lake of Menteith Fisheries ltd, my main concern relates to the potential adverse effect on the water quality of the Malling Burn which supplies our trout rearing facilities downstream of the proposal. Many trout fisheries have recently closed or have severely contracted (Gartmorn Dam, North Third, Loch Fad, Loch Leven) and the Lake has managed to buck this trend by providing quality fish (the main variable cost) in a beautiful setting within the Park. This development threatens the economic viability of the business (and its employment of six people) as it could bring to an end our successful restocking trout rearing system on the Malling Burn. Due to water constraints this production cannot be transferred elsewhere and would be lost. Importation of live fish is uneconomic as well as being biologically and ecologically unsound. My reasoning for this conclusion is now detailed:

1. Nutrient Status of the Lake, presumably sewage would be piped away, if not, the loading of nutrients into the Lake would significantly raise nutrient levels (and hence algae) as a consequence of the Lake's small water catchment. This slow flush rate increases the sensitivity of the Lake to nutrient input which could destroy; the flora and fauna, the angling, and the beauty of the Lake, hence the SSSI status of the burns in the proposed development area.

2. Increase in contaminates in water destined for fish for human consumption due to run off from tarmac, cars and gardens. Any reduction in the flow of water reduces the number of trout that can grown for restocking. If surface water is led away, our water supply would be grossly reduced and our capacity to raise fish and hence profitability would be affected if surface water is allowed to progress into the Malling Burn tributaries, SEPA's SUDS recommendations would be enforced. Following discussions with SEPA I am of the opinion that this would entail the building of a lagoon or small reservoir to treat the water. This functions by diluting any release of toxins before they

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reach the water courses and fish destined for human consumption. The water quality would be reduced as it would contain an increased number of pollutants associated with run off from tarmac, cars and gardens (e.g. heavy metals, oils, salt, pesticides).

3. Reduction in water quality (raised temperature). The SUDS pond system for reducing toxin concentration is by treatment in a body of water. This would change the nature of our water supply in summer (the limiting time of year in terms of stock carrying capacity) from cool 14°C spring fed to a supply of tepid pond water (>24°C) exposed to heat input. The amount of dissolved oxygen in water is directly proportional to water temperature. In a re-stocking growing pond, water temperature like this can quickly result in fish mortality from lack of oxygen. This factor would also reduce our ability to grow trout. The pond water would have higher levels of algae and be liable to support populations of the water snail (lymnaea) an intermediate host of eye fluke, a serious pathogen of rainbow trout.

4. Siltation during construction. We have experienced problems with siltation in the past - associated with minor constructions and road resurfacing. There is no practical method to eliminate siltation, which muddies the water and the fish cannot see the feed. This development is likely to see long periods of siltation with a consequential lack of growth in our fish for restocking.

5. Drainage on the site would increase speed of run off and reduce flow during drier spells - again reducing our trout carrying capacity. Evaporation from a SUDS pond would further reduce flows.

6. The Chalet Park is likely to be visible. A major part of the Lake's draw as a visitor attraction is that the views of human habitation are minimal. As a consequence of the above, this proposal would severely compromise one of the major visitor attractions within the National Park.
I attended the meeting at Port of Menteith hall where deadline was extended to 14/7/14. I wish to object to the proposed plan to build 50 holiday lodges for the following reasons.

1. The purpose is to aid Aberfoyle yet the development is well beyond the villages boundary. It is not within walking distance, there is no useable pathway and the road is busy, narrow and dangerous to pedestrians.

2. The removal of such a large area of woodland is undesirable.

3. There is a possibility of contamination of local streams which run directly into the lake. This would be a threat to the local fisheries company which relies on clean water. Last year this tourist attraction had 14,000 visitors.

4. If Aberfoyle needs assistance surely the lodges should be placed inside the boundaries of the village- sites are available and have been too lightly dismissed.

5. Too little consideration has been given to the detrimental effects of the scheme and the need to connect it more directly to its original purpose ie. economic improvement for Aberfoyle.
I wish to register my objection to the proposed development of 40 to 50 lodges in the forest at Braeval for the following reasons:

1. The purpose of the development is to improve the usage of shops, bars and restaurants in Aberfoyle. The location of the development will not achieve this as it is too far away from the centre of Aberfoyle. People will have to use their cars to go anywhere and are then likely to drive east along the A81 or south along the A81 from the A81/A821 roundabout as into Aberfoyle. For a development to succeed in creating significant additional trade in Aberfoyle, it must be located within walking distance of the centre.

2. There is no evidence of demand for such a development. You have presumed that there is a demand without apparently taking any steps to establish whether such a demand exists apart from making some basic calculations based on some very superficial assumptions. The evidence points to the contrary. The existing holiday lodges in the area which are of high quality are not fully occupied even in peak periods. To add such a large additional capacity would have a very serious effect on the existing providers. The result would be that income would drop so that the ongoing improvements to maintain the high quality of the existing facilities would cease. A spiral of decline would then start, ultimately leading to poor quality accommodation and a low grade visitor experience. This is the opposite of what the national park should be promoting.

3. The proposed location covers a significant amount of the Lake of Menteith SSSI. The burns running into the lake were included in the SSSI because of their importance to the water quality of the Lake. The Malling burn is one of the two main burns feeding the lake and any deterioration in its quality would have an immediate effect on the lake.

4. The water in the Malling burn is used by the Lake of Menteith fisheries for rearing fish for restocking the lake. This requires exceptionally clean water and the proposed development would have an adverse effect on the water quality and a reduction in the water quantity. In summer the volume of water is critical and any reduction could make the fish ponds unviable. This would jeopardise the whole fishing operation which is one of the top visitor attractions in the national park.

The main issues report sets out your vision for the park. For conservation it is for, ‘an internationally renowned landscape where the natural beauty, ecology and the
cultural heritage are positively managed and enhanced for future generations.' For rural development you state 'in the national park businesses and communities thrive and people live and work sustainably in a high quality environment'. The Braeval proposal clearly goes against both of those aspirations and therefore runs counter to your vision for the national park.

If there is a genuine demand for additional accommodation, and this needs to be established, it must be within walking distance from the centre of Aberfoyle. There is an alternative site to the east of Aberfoyle adjacent to the golf course and Dounan’s camp which would be suitable. It will not be possible to develop the site without affecting the water quality in the Malling burn which is one of the two major feeder burns into the lake and which is used for the rearing of fish for the lake.

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I refer to the proposal to develop 40 to 50 lodges within the forestry commission land at braeval in port of Menteith. I am writing to lodge an objection in the very strongest terms from the lake of Menteith fisheries ltd because of the potentially devastating effect that this development is likely to have on our business which provides one of the best high quality attractions for visitors and residents in the national park.

The Lake of Menteith is the premier trout fishery in Scotland. It attracts some 14,000 visitors per year and is host to both national and international competitions. Every year we host the national fly fishing (lochs) Championship final, the ladies' national championship and the Scottish club championships, one of the largest in the angling world. Last year we were the venue for the home international and will be again when it returns to Scotland in 2015 when we will also host the youth international.

Because of this it is one of the most important visitor attractions in the national park and is well known nationally and internationally for providing a facility of the highest quality. We are also an important employer in the area and currently have 6 people working for the company. The lake and its fishery are often referred to as a jewel in the crown of the national park.

Since the company was formed 50 years ago, we have protected the water quality and ecology of the lake and because of this it was designated as an SSSI. However, the lake is mesotrophic and the inflowing quantity of water from the catchment is very low in relation to its volume. It is therefore very sensitive to both the quality and quantity of the inflowing water. Virtually all of the water flowing into the lake comes from springs and surface run-off to the north of it where there are two main burns flowing into it. Both burns are used for rearing fish and these hatcheries form a vital part of the operation of the fishery.

When the SSSI was created 20 years ago it was recognised that the burns that feed the lake were crucial to maintaining the quality of water. All of the burns, streams and ditches that run into the lake were therefore included within the SSSI plus a strip of 30 metres on either side of them. The area of the proposed development covers much of the catchment of the Malling burn and a considerable part of this area is designated as an SSSI. Any development that could jeopardise the water quality or quantity will be strongly resisted by the company and we have already successfully halted a proposal to extend the area of forestry within the catchment.

Scottish Environment Protection Agency suggest, in their submission, that using suds will enable the water quality to be maintained. We dispute this. The rearing of fish...
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requires pristine water and although suds will remove some of the contaminants, they will not return the water to its pristine condition.

The Lake of Menteith and its opportunity for excellent fishing make it one of the most important high quality attractions for any tourists who visit this area and we obviously welcome developments that will bring more customers. However, we object very strongly to the proposal to site chalets within the catchment of the lake of Menteith in the forestry at Braeval as the location is totally unsuitable. The main purpose of the development appears to be to provide additional customers for the shops, pubs and restaurants in aberfoyle. If this is to be achieved, the development needs to be much closer to the village, and within walking distance of the centre. There is at least one site on the eastern edge of aberfoyle which meets this requirement.

Appendix F, page 87. Under ID No. 121 for the proposed development at Braeval, the comments state that 'the wider site is located close to the lake of Menteith SSSI'. Map 3 of appendix d of the draft environmental report shows how the SSSI covers much of the area that is proposed for development so the failure to recognise this is a fundamental error when considering the suitability of the site. (Note: Map3 Appendix D and Appendix F of Strategic Environmental Assessment Draft Environmental Report can be found within the downloads section of www.ourlivepark.com)
As a resident of the Trossachs NP, I have reviewed your development plan for the area and have some feedback for the housing development plans near Braeval, Port of Menteith and Aberfoyle. As well as a comment on your plans for 50 chalets in the forest, this is an observatory evaluation from the outside as to what direction the national park company is heading in. I understand when you are employed by a corporation you can be blindsided, so please take into account the feedback that you may get with an open mind.

One of your key strategies is to develop ‘node’ points in a sustainable fashion - to encourage local employment, boost local businesses and so on. This is good, but I feel the idea to build 50 chalets outside of the Aberfoyle ‘node’ point is stretching this strategy too far.

The destruction of a large area of the natural environment outside of the node point is obvious. It has to be nearly 2 miles out of the town and is probably nearer Port of Menteith. I can see it becoming the first stage of a string of developments between the two, similar to the approach to many towns, but, this is a National Park!

In addition to the basic development construction there are the inevitable consequences eg:-

- Just to gain access to such an unspoilt area will require major road improvements. I suspect the local authority will insist on traffic lights or more likely a roundabout off the existing road. The total housing area including, I suspect, the full run of the road from the Rob Roy Motel will need to be illuminated (to a set standard for safety reasons). Apart from being a huge cost this will industrialise this section, it would become the main focus of the area, the natural environment relegated to a secondary mostly hidden afterthought.

- Servicing the development would be necessary but adds another problem. The utilitarian nature of providing electricity, telephone, water supplies and rubbish disposal with their associated poles, overhead cables, manholes, cabinets, squadrons of bins and so on will add to this industrialisation and of course the cost.

- The necessary illumination will destroy the ‘dark sky’ strategy for this area. The strength of the lighting will inevitably mask the present starlight night skies which we all enjoy. Really all part of the same industrialisation as above.
- One of the strengths of sustainability is the means of access. Public transport from Glasgow is two buses/day. This paucity means everyone visiting Aberfoyle boosted by those using the chalets will have to use their own transport, inevitably cars. I realise that this fundamentally is another issue but this proposed development will exacerbate the present position.

- Self catering is famous for attracting holidaymakers who bring their own provisions and do their own cooking. Coupled with the location miles out of town, the boost to the businesses will be minimal. It would be nice to think of streams of visitors walking or cycling in to the centre for entertainment and shopping but I’m afraid it never happens, not in my experience anyway.

I agree with your reasons driving the strategy for the development of the node points. But the crucial part of this proposal is that it’s not in one of these ‘points’. There are always difficulties for development in towns but whatever the problems I believe the alternative to build on and destroy the natural beauty of our National Park has to be resisted or otherwise where will it end?

The change in the managerial level of the trossachs NP corp appears to have shifted the focus from community, education and conservation to manipulating the 'international renowned' beauty of this area for profit. Developing bigger roads, more shopping centres (like the 'tourist attraction' on the banks of loch lomond - its a shopping centre) and cheaply built housing/accommodation. It would be great if the focus could go back to maintaining what we have (road surfaces for example), improving the education you used to offer and actually protecting the environment (even if this means closing parts of the forest off and not ravaging it for money for a season!). I think with that model, children will grow up understanding and respecting the outdoors, tourism will thrive because of the lack of concrete and street lights in the wilderness and it will be a sustainable as the environment will flourish. You'll still make money that way too.
5 Placemaking - What sites should be considered for development? >> 5.2 Aberfoyle >> 5.2.1

Aberfoyle Question 1: Do you agree with the preferred option? Why?

Customer Reference: 00209
Customer Name: Scottish Campaign for National Parks
Comment Reference: LDP01/MIR/CONS/00209/1/005
Comment Method: EMAIL
Customer Type: Other Organisation

Verbatim Comment:
Scottish Campaign for National Parks generally supports Option 1 - Preferred.

Are we correct in assuming that site MIR4 is a development proposed by the Forestry Commission and would be implemented by them?
Aberfoyle Question 2: Do you have any other alternative Options for the future of Aberfoyle?

Verbatim Comment:
There has been zero consultation with the local community in Port of Menteith regarding building these lodges; in fact, very few of the locals know anything about it at all. At the very least - given the potential huge impact this will have on the community - I would suggest that a meeting is urgently tabled for one of your team to discuss this with the locals in the Port of Menteith village hall. Considering the relatively short time now available for us to express our views, this would have to be scheduled very soon.
5 Placemaking - What sites should be considered for development? >> 5.3 Ardentinny

"There is no mention, as far as I could see, of the beach at Ardentinny and its Forestry input in the beach area. The beach gives access to Loch Long, the river Clyde (and Glasgow, Scotland's largest city) and also the Atlantic. This is a resource which could be of great value to The Park and its accessibility to the rest of the world.

The NP would do well to consider how this natural resource could benefit the profile of the Park.

I also have the impression that the NP has its focus on the eastern areas of the Park as it does not seem to have any strategies for Cowal. The Trossachs and Loch Lomond seem to be the favourites - sorry, it is not sour grapes, just an impression on reading NP literature."
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.3 Ardentinny

Customer Reference: 00058
Organisation: Ardentinny Community Trust
Customer Name:
(If applicable) Limited
Comment Reference: LDP01/MIR/CONS/00058/1/002
Comment Method: LETTER
Customer Type: Local Public Body

Verbatim Comment:
3. In responding to the Report as it will have any effect on Ardentinny as a community we must first refer to the principal aims of the National Park:

a) To conserve and enhance the natural and cultural heritage of the area:
Recent decisions of the Authority, e.g. the approval of gold mining development at Tyndrum and the reported emphasis of the Park management to concentrate on business development, do not encourage us to believe that the Plan will prevent continue to hold to this aim in their future decisions which might relate to the Ardentinny area.

b) To promote sustainable use of the natural resources of the area:
In the case of Ardentinny the natural resources here are the land and the forestry and water sources and other development of that land by the Forestry Commission; the Park Authority does not appear to have participated in that development so that there has been no, or very little, consultation with the local communities.

c) To promote understanding and enjoyment.....recreational.....special qualities.....by the public:
1. As a revised Draft Local Plan this document would be better entitled as such and would be more accessible and user-friendly if it were to be issued as a series of development ideas with a foreword and a separate section which could be aimed directly at each local demographical area of the Park, as a smaller version for each locality: the full version being advertised as available as requested.

2. The provisions for providing views on the Report are restrictive, in that not all residents should be assumed to be online, or to use text, or able to visit Balloch and local community meetings cannot be assumed to be representative or attended by a majority. A much shortened version, for each locality as suggested above, would have been a help in gaining a bigger response from individuals and communities.

3. In responding to the Report as it will have any effect on Ardentinny as a community we must first refer to the principal aims of the National Park:

a) To conserve and enhance the natural and cultural heritage of the area:
Recent decisions of the Authority, e.g. the approval of gold mining development at Tyndrum and the reported emphasis of the Park management to concentrate on
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business development, do not encourage us to believe that the Plan will prevent continue to hold to this aim in their future decisions which might relate to the Ardentinny area.

b) To promote sustainable use of the natural resources of the area:
In the case of Ardentinny the natural resources here are the land and the forestry and water sources and other development of that land by the Forestry Commission; the Park Authority does not appear to have participated in that development so that there has been no, or very little, consultation with the local communities.

c) To promote understanding and enjoyment......recreational.....special qualities......by the public:
The Ardentinny section refers only to "...footpath and cycle path connections....."which omits the fact that we possess the only beach site on the whole of Loch Long and a recently restored walled garden which attracts a steady influx of visitors, as well as woodland trails, sites of historic interest, an Outdoor Centre and a village hall used for events which also attract many visitors.

d) To promote sustainable economic and social development of the area’s communities:
We applaud the Park’s attempts to encourage participation and cohesion by the community organisations in Ardentinny and regret that little progress is visible at present, but we hope that the period covered by this Plan will show increasing improvement. It is clear that economic improvement will be limited, without the necessary infrastructure and some change in the demographic make-up but the need for road improvement and capacity is noted thought in a deleteriously negative way.

The proposals in the previous Local Plan for housing development were the basis of strong opposition from this community and the clear reasons for deletion from the Plan still exist.

Small gap housing provision is acceptable but the tendency for vacant housing to become holiday lets and the sustained lack of social facilities and a poorly maintained approach road are issues which could be more vigorously tackled, preferably with the cooperation of the Argyll and Bute Council.

Footpath improvement, being largely on Forestry Commission land, is of minimal necessity except where access for disabled people is desirable and should not be undertaken when the Park’s first principle is at variance with improvement.

Street lighting has been an issue of contention with residents, who very largely value the benefits of clear night skies and a largely natural housing environment and should not be promoted without further surveys of opinion.

As suggested above, more and regular cooperation with the relevant departments of Argyll and Bute Council and the Forestry Commission on matters of road maintenance and improvement, transport, employment opportunities, social facilities including public toilers, tourism, renewable energy provision, road signage and other improvements which would help to give rise to increased tourist visiting and help to change the population imbalance.

Although shown on an accompanying map as a "main settlement" very little attention is given otherwise to the attractions and needs of Ardentinny; under Community and

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Partner Engagement we are not included as needing new tourism or visitor development and apparently incapable of "social enterprise aspirations".

Revealing as indicative of the sparse attention given to Ardentinny is the fact that the aerial photograph on p.77 only shows a small part of the village, much of the woodland but nothing of the northern half, comprising much of the longer-established housing, the church, the beach, caravan park, old estate grounds and all of Glen Finart - which comes within our boundary.

Whilst fully aware of the relative size and near-remoteness of this village, compared to much larger and more economically productive towns and areas of the Park, we find none or very little of the focus that we might expect to encourage and support in any possible ways and aspirations and social benefits which sitting within one of Scotland’s only two National Parks should be our due.
5 Placemaking - What sites should be considered for development? >> 5.3 Ardentinny

1. As a revised Draft Local Plan this document would be better entitled as such and would be more accessible and user-friendly if it were to be issued as a series of development ideas with a foreword and a separate section which could be aimed directly at each local demographical area of the Park, as a smaller version for each locality: the full version being advertised as available as requested.

2. The provisions for providing views on the Report are restrictive, in that not all residents should be assumed to be online, or to use text, or able to visit Balloch and local community meetings cannot be assumed to be representative or attended by a majority. A much shortened version, for each locality as suggested above, would have been a help in gaining a bigger response from individuals and communities.

3. In responding to the Report as it will have any effect on Ardentinny as a community we must first refer to the principal aims of the National Park:

   a) To conserve and enhance the natural and cultural heritage of the area:
      Recent decisions of the Authority, e.g. the approval of gold mining development at Tyndrum and the reported emphasis of the Park management to concentrate on business development, do not encourage us to believe that the Plan will prevent continue to hold to this aim in their future decisions which might relate to the Ardentinny area.

   b) To promote sustainable use of the natural resources of the area:
      In the case of Ardentinny the natural resources here are the land and the forestry and water sources and other development of that land by the Forestry Commission; the Park Authority does not appear to have participated in that development so that there has been no, or very little, consultation with the local communities.

   c) To promote understanding and enjoyment.....recreational.....special qualities.....by the public:
      The Ardentinny section refers only to "...footpath and cycle path connections....."which omits the fact that we possess the only beach site on the whole of Loch Long and a recently restored walled garden which attracts a steady influx of visitors, as well as woodland trails, sites of historic interest, an Outdoor Centre and a village hall used for events which also attract many visitors.
d) To promote sustainable economic and social development of the area’s communities:

We applaud the Park’s attempts to encourage participation and cohesion by the community organisations in Ardentinny and regret that little progress is visible at present, but we hope that the period covered by this Plan will show increasing improvement. It is clear that economic improvement will be limited, without the necessary infrastructure and some change in the demographic make-up but the need for road improvement and capacity is noted thought in a deleteriously negative way.

The proposals in the previous Local Plan for housing development were the basis of strong opposition from this community and the clear reasons for deletion from the Plan still exist.

Small gap housing provision is acceptable but the tendency for vacant housing to become holiday lets and the sustained lack of social facilities and a poorly maintained approach road are issues which could be more vigorously tackled, preferably with the cooperation of the Argyll and Bute Council.

Footpath improvement, being largely on Forestry Commission land, is of minimal necessity except where access for disabled people is desirable and should not be undertaken when the Park’s first principle is at variance with improvement.

Street lighting has been an issue of contention with residents, who very largely value the benefits of clear night skies and a largely natural housing environment and should not be promoted without further surveys of opinion.

As suggested above, more and regular cooperation with the relevant departments of Argyll and Bute Council and the Forestry Commission on matters of road maintenance and improvement, transport, employment opportunities, social facilities including public toilers, tourism, renewable energy provision, road signage and other improvements which would help to give rise to increased tourist visiting and help to change the population imbalance.

Although shown on an accompanying map as a "main settlement" very little attention is given otherwise to the attractions and needs of Ardentinny; under Community and Partner Engagement we are not included as needing new tourism or visitor development and apparently incapable of "social enterprise aspirations".

Revealing as indicative of the sparse attention given to Ardentinny is the fact that the aerial photograph on p.77 only shows a small part of the village, much of the woodland but nothing of the northern half, comprising much of the longer-established housing, the church, the beach, caravan park, old estate grounds and all of Glen Finart - which comes within our boundary.

Whilst fully aware of the relative size and near-remoteness of this village, compared to much larger and more economically productive towns and areas of the Park, we find none or very little of the focus that we might expect to encourage and support in any possible ways and aspirations and social benefits which sitting within one of Scotland’s only two National Parks should be our due.
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**Verbatim Comment:**
SCNP is happy with the preferred option but would like to see sensitive lighting schemes adopted to minimise the impact on dark skies.
Verbatim Comment:

1. As a revised Draft Local Plan this document would be better entitled as such and would be more accessible and user-friendly if it were to be issued as a series of development ideas with a foreword and a separate section which could be aimed directly at each local demographical area of the Park, as a smaller version for each locality: the full version being advertised as available as requested.

2. The provisions for providing views on the Report are restrictive, in that not all residents should be assumed to be online, or to use text, or able to visit Balloch and local community meetings cannot be assumed to be representative or attended by a majority. A much shortened version, for each locality as suggested above, would have been a help in gaining a bigger response from individuals and communities.
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Verbatim Comment:
Arrochar and Succoth: The MIR indicates that there has been no development on the sites identified in the current Plan. Site MIR105 (Succoth) has been identified as a potential site for 26 homes (current planning application). This site may have a potential impact on the A83(T) junction and any impact and potential mitigation measures will required to be discussed with Transport Scotland.

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Verbatim Comment:
Placemaking:
The discussions undertaken to date, in particular on the key sites, has been helpful in developing our understanding of the relevant issues for the strategic transport network. In considering the potential impact and mitigation required as a result of the placemaking and development changes, we would encourage use of the DPMTAG guidance to inform the Proposed Plan.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.4 Arrochar & Succoth

Customer Reference: 00145
Customer Name: (If applicable)
Organisation: Scottish Water
Comment Reference: LDP01/MIR/CONS/00145/1/003
Comment Method: EMAIL
Customer Type: Key Agency

Verbatim Comment:
Page 80; Arrochar/Succoth; Scottish Water will offer any guidance and support required for a Masterplan of the area and are to participate in a Masterplan process.

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.4 Arrochar & Succoth

Customer Reference: 00187
Customer Name: (If applicable)
Organisation: SEPA
Comment Reference: LDP01/MIR/CONS/00187/4/065
Comment Method: EMAIL
Customer Type: Key Agency

Verbatim Comment:
The Pier, Arrochar (local plan T1)

Within coastal flood extent but operational/locational reasons possible so recommended that cognisance is taken on 4.47mOD CFB level. This will need to define the areas at risk of flooding, the relative vulnerability of the proposed use and confirm design layout and levels.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
The Loin Water is located on the western boundary of the site with large parts of the site at risk of fluvial flooding. We would therefore require a FRA which assesses the risk of flooding to the site from this watercourse to ensure that built development is located outwith the functional floodplain and or adoption of appropriate flood management measures.
5 Placemaking - What sites should be considered for development? >> 5.4 Arrochar & Succoth

Customer Reference: 00187
Customer Name: Arrochar (local plan ST2/CU1)
Comment Reference: LDP01/MIR/CONS/00187/4/063
Organisation: SEPA
(If applicable)
Comment Method: EMAIL
Customer Type: Key Agency

Verbatim Comment:
A minor watercourse runs adjacent to the site and represents a potential risk of flooding. A basic FRA will be required either prior to, or in conjunction with any planning application. Adjacent to coastal flood extent so recommended that cognisance is taken on 4.47mOD CFB level. This will need to define the areas at risk of flooding, the relative vulnerability of the proposed use and confirm design layout and levels.

Water Environment comments: Unable to access site plans so can’t comment on extent of site in relation to waterbodies nearby. Loch Long to the north and burn to the east. Potential impact. Connect to ScW sewer; assess capacity of network and septic tank. ScW pumping station to the west of the site.
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**Verbatim Comment:**

Cobblers Rest (local plan site H2)

A minor watercourse culverted in sections runs through this site and is a potential risk of flooding. A basic FRA will be required either prior to, or in conjunction with any planning application. Adjacent to coastal flood extent so recommended that cognisance is taken on 4.47mOD CFB level. This will need to define the areas at risk of flooding, the relative vulnerability of the proposed use and confirm design layout and levels.

**Water Environment comments:** Unable to access site plans so can't comment on extent of site in relation to waterbodies nearby. Loch Long to the north and burn to the east. Potential impact. Connect to ScW sewer; assess capacity of network and septic tank. ScW pumping station to the west of the site.
5 Placemaking - What sites should be considered for development? >> 5.4 Arrochar & Succoth

Land at Church Road (MIR 7a)

A minor watercourse runs through this site, this poses a potential risk of flooding. A basic FRA will be required either prior to, or in conjunction with any planning application. This will need to define the areas at risk of flooding, the relative vulnerability of the proposed use and confirm design layout and levels. We would be likely to object to the development of this site unless appropriate additional information is submitted / the site plan is amended to remove the sections thought to be at risk.

Land at Church Road (part of site allocated ED1) (MIR 7b and same for MIR 7c)

A minor watercourse culverted in sections runs through this site and this represents a potential risk of flooding. A basic FRA will be required either prior to, or in conjunction with any planning application. This will need to define the areas at risk of flooding, the relative vulnerability of the proposed use and confirm design layout and levels.
I currently reside in Irvine but previously lived in Paisley and from there travelled frequently through the NP area on busines and leisure, and even more often travelled to the NP area with my wife and our dogs and in past years with our children. It is, and always was, an outstanding area of amenity and beauty, but I am sure that there is much that can be done to improve the amenities for residents and visitors alike without harming the natural beauty in any way.

I would recommend two things in particular.

Firstly a substantial redevelopment of Arrochar. A beautiful spot in a wonderful location but where travellers or visitors should wish to stop but by and large they don't because the town and its immediate area is rather depressing, insipid and uninspired. I think that the developments of the western side of the loch especially the torpedo factory area are an excellent idea and would no doubt quickly lead to businesses aimed at the tourist trade - shops, cafes, restaurant etc - growing around the head of the loch. A mini promenade around that area would also enhance the look and allow seats for some to sit and admire the view down the loch. Obviously appropriate car parking would be required (no gain without pain).

Finally could I add my voice, although I am not directly involved, to the need for a walking, and perhaps even cycling facility between Tarbet and Arrochar. That has always been a fast bit of road and I most certainly do not advocate any negative measures to slow traffic below the current speed limits. But a cycle and walkway is needed and should neither be difficult nor overly expensive to deliver. I would also become even more important if the above ferry connection was established increasing the likely traffic volume in the Tarbet / Arrochar area.

Could I add a last slightly critical observation. Anyone who has travelled and driven abroad, for example to Switzerland or the Italian lakes would wonder why we in Britain, or perhaps soon to be Scotland, do not have a road and tunnel going up from Tarbet, or perhaps Arrochar, through Ben Vorlich. to take commercial and through traffic, leaving the lochside road to be purely scenic and enjoyed by tourists. But then Switzerland is such a small country and Italy so poor that like scotland we could not possibly deal with such things by ourselves without the assistance of a bigger country to help us.......!
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**Verbatim Comment:**

Options are OK but what progress has been made on Ben Arthur resort and a long term objective of restoring the pier for use by Waverly etc?
5 Placemaking - What sites should be considered for development? >> 5.4 Arrochar & Succoth >> 5.4.1

Arrochar & Succoth Question 1: Do you agree with the Vision above? Why?

Q1. NP: Do you agree with The Vision?
CC: Partially.

Arrochar is a small rural village with very little open space at ground level. If all of the National Park's vision were to be put in place over the next twenty years Arrochar would lose its rural status which attracts people to live here. The infrastructure of the community requires families to settle here to sustain local primary school, churches, Dr Surgery etc. Tourism although needed does not support all of the village requirements.

The following CC response has been compiled through talking with members of our community.
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<td>Arrochar &amp; Succoth Question 1: Do you agree with the Vision above? Why?</td>
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### Luss Estates

**Customer Reference:** 00113  
**Comment Reference:** LDP01/MIR/CONS/00113/1/024  
**Comment Method:** OLDP  
**Organisation:** Luss Estates Company  
**Customer Type:** Private Business

**Verbatim Comment:**  
Luss Estates agrees with the vision for Arrochar & Succouth - the area has unrealised potential

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### Loch Lomond Steamship Company

**Customer Reference:** 00144  
**Comment Reference:** LDP01/MIR/CONS/00144/1/005  
**Comment Method:** EMAIL  
**Organisation:** Loch Lomond Steamship Company  
**Customer Type:** Private Business

**Verbatim Comment:**  
ARROCHAR AND SUCCOTH Q.1  
Agreed, but emphasize sea/water access.
## Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.4 Arrochar & Succoth >> 5.4.2

### Arrochar & Succoth Question 2: Do you agree with the above Preferred Option? Why?

**Verbatim Comment:**

Q2. NP: Do you agree with the preferred option?
   CC: Not all of it.

Option 1 Preferred.

Agree with the development of workshops at Tighness (ED1) now that the former Torpedo Range is being used for tourism, but with the 26 houses approved for Succoth (MIR105) we question as to wither the six homes shown at (MIR 7b) and designated social housing or private development by Luss Estate? If the houses were to be built the later would be the CC’s preferred option.

The planning for the 26 houses at Succoth with an improved access road leading to the A83 have now been approved (MIR105)

Placemaking priority (ST2/CU1). The community is now working independently to the Arrochar Hotel and have changed the Heritage Centre idea to a Visitor Attraction.

A feasibility study to extend the village hall to incorporate the VA has been completed. Funding is now been sought. The CC has already stated that in principle they support this venture.

The CC has no knowledge on the state of the Arrochar Hotel’s proposal to build houses on the site of the old football pitch. We do support (T1) improvements to water access. Also, the resurrection of the access from the A814 to the A83 which runs up the left hand side and along the top of the old football pitch allowing foot access from the pier to Wilson’s turn. This was the original corepath / right away between these two roads.

The CC has concerns that the upgrade of the A82 will result in more tourist traffic using the direct route to the North West rather than coming through Arrochar.

(ST1)The CC welcomed the approved development planned for the, now, Ben Arthur Resort.
**Arrochar & Succoth Question 2:** Do you agree with the above Preferred Option? Why?

**Verbatim Comment:**
Yes - it reflects Charette outcomes. Although there is a pavement along the trunk road from the Ben Arthur Resort to Succoth/Arrochar, this is not a pleasant route for walkers. We suggest that options are explored for a more enjoyable off road route into Succoth/Arrochar from this resort.

**Verbatim Comment:**
We agree with the preferred option.

Sites MIR7B & ED1 should extend north and east of church Road into the adjacent fields and woods, to allow for maximum flexibility when it comes to specific site constraints.
### 5 Placemaking - What sites should be considered for development? >> 5.4 Arrochar & Succoth >> 5.4.3

**Arrochar & Succoth Question 3: Do you think that in the future the land north of Succoth should be reviewed for development potential – when other land identified is developed?**

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#### Verbatim Comment:

Q3. NP: Do you think that the future of the land north of Succoth should be reviewed for development potential - when other land identified is developed?

  CC: No

Option 2 Longer term.

The CC has concerns over the Charrette Vision.

We have already stated that the land beyond the Succoth envelope should be left as green space in accordance with the National Park's Aims.

Feorlin Glen is the only agricultural ground / green belt left in Arrochar where locals and visitors can enjoy low level walks / recreation. Should a masterplan be designed for the Succoth area of Arrochar the Community Council would appreciate local involvement from the start. We understand the creation of the master plan would include the flood plain of ST3 and CU2.

The CC support a safe footpath / cycle path network linking with Tarbet if it follows the route shown in the Livepark document as following the old military road not the A83.
5 Placemaking - What sites should be considered for development? >> 5.5 Balloch

What B&HCC is most interested in is obviously our CC area of Balloch, however, we have been approached regarding transport aspects of the report which seem to leave out Loch Lomoncl and its pier's infrastructure. The report does state big ideas for the next 20 years. So why leave out the piers on Loch Lomoncl and the possibility that in the next 20 years a ship may sail to them. There is a nice picture of the Maid of the Loch, in the Balloch section but no mention in the report regarding her possible use as a key tourist attraction and method of transporting people around the loch. The CC has seen the response from the Steamship Company and do hope their comments are taken seriously and any update to the Main Issues Report reflects on those comments. We therefore think it should include the pier at Balloch and other piers on the loch which show nothing on the plan be similarly noted as possible transport links.
As mentioned, it is unfortunate to see working age and younger families are predicted to decline while the retired population increases. I hope to see schemes to encourage families to live in the park. Ensuring new build housing is encouraged for first time buyers such as myself and not simply small expensive schemes affordable to retired individuals. Working groups, panels or schemes to appreciate and build cohesion with the future of the park through younger working age people would be welcomed and encouraged. While a decreasing minority we would be the ones with the inspiration for the future, possibly willing to take on small business and would be the longer term population of the park if encouraged to stay.

Overall I am encouraged by the proposal, for some of the home building I only wish it was today and not a hope for the future but I am encouraged that the park is a place for residence for a long time to come.
Rebuild Balloch Castle and introduce a regular ferry service that runs every 30 mins enables people to island hop and explore the Park. Ferry service similar to that in Hamburg Germany.

"I would like to see a new slipway for fishing boats only, the main 2 slipways at Balloch are to busy large boats and jet ski's.

Lets have an Anglers boats only Slip way."
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.5 Balloch

Customer Reference: 00186
Customer Name: Historic Scotland
Comment Reference: LDP01/MIR/CONS/00186/1/003
Comment Method: EMAIL
Customer Type: Public Body

Verbatim Comment:
For the following site carried forward from the ALP, we recommend early engagement with HS on development proposals which may raise complex or significant issues for the assets listed below. This will be key to avoiding adverse impacts including respecting the site and setting and character of assets and optimising positive outcomes for the historic environment:

Balloch - ST4 Preferred existing site Balloch Castle

SM Balloch Castle, earthwork 3385 and A listed Balloch Castle HB no 123, Balloch Castle GDL
### Chapter Commented on:
5 Placemaking - What sites should be considered for development? >> 5.5 Balloch

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**Verbatim Comment:**
Loch Lomond Shores Balloch (local plan site T3)

Operational need.

Water Environment comments: This appears to be the project covered by CAR S 1103044 and 45 dredging and pontoon construction. The plan in the 'local plan' appears to be that site. If so no requirement for further comment as covered by licences. If not, please advise.
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.5 Balloch

Customer Reference: 00187
Customer Name: 
Organisation: SEPA
(If applicable)
Comment Reference: LDP01/MIR/CONS/00187/4/058
Comment Method: EMAIL
Customer Type: Key Agency

Verbatim Comment:
The Old Station (local plan ST7/T2)

The River Leven is located on the eastern boundary of the site with large parts of the site at risk of fluvial flooding. We would therefore require a FRA which assesses the risk of flooding to the site from the Leven to ensure that built development is located outwith the functional floodplain and or adoption of appropriate flood management measures.

water environment developer site requirements and comments: Buffer strip required. Restoration could contribute to reducing current morphology pressures.
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.5 Balloch

Customer Reference: 00187
Customer Name: 
Organisation: SEPA
(If applicable)
Comment Reference: LDP01/MIR/CONS/00187/4/052
Comment Method: EMAIL
Customer Type: Key Agency

Verbatim Comment:
Carrochan Road (local plan H3)

The River Leven is located on the western boundary of the site with parts of the site at risk of fluvial flooding. We would therefore require a FRA which assesses the risk of flooding to the site from the Leven to ensure that built development is located outwith the functional floodplain. Most of the site is developable.
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.5 Balloch

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<td>EMAIL</td>
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<tr>
<td>Customer Type:</td>
<td>Key Agency</td>
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Verbatim Comment:
St Kessogs, East Riverside and Moss O’Balloch (local plan site ST8)

The River Leven is located on the eastern boundary of the site with large parts of the site at risk of fluvial flooding. We would therefore require a FRA which assesses the risk of flooding to the site from the Leven to ensure that built development is located outwith the functional floodplain and or adoption of appropriate flood management measures.

water environment developer site requirements and comments: Possibly a small watercourse nearby so could this be unculverted. Buffer strip required. Restoration could contribute to reducing RBMP morphology pressure.
### 5 Placemaking - What sites should be considered for development? >> 5.5 Balloch

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<th>Chapter Commented on:</th>
<th>5 Placemaking - What sites should be considered for development? &gt;&gt; 5.5 Balloch</th>
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<td>Key Agency</td>
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**Verbatim Comment:**

Woodbank House (local plan STS)

A minor watercourse runs through this site and another one runs along the site boundary, these pose a potential risk of flooding. A basic FRA will be required either prior to, or in conjunction with any planning application. This will need to define the areas at risk of flooding, the relative vulnerability of the proposed use and confirm design layout and levels.

Water environment developer site requirements and comments: Small watercourse along site boundary so principle of no deterioration applies. Buffer strip required there may be restoration opportunities.
5 Placemaking - What sites should be considered for development? >> 5.5 Balloch

Customer Reference: 00187
Customer Name: 
Comment Reference: LDP01/MIR/CONS/00187/4/055
Organisation: SEPA
(If applicable)
Comment Method: EMAIL
Customer Type: Key Agency

Verbatim Comment:
Balloch Castle (local plan ST4)

No flood risk apparent.

Foul Drainage: Lack of detail on nature of tourism development. Connect to Scottish Water system for any wastewater discharge. May be issue with connection due to nearest sewer being several hundred metres to the south but this is preferred option.

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5 Placemaking - What sites should be considered for development? >> 5.5 Balloch

Customer Reference: 00187
Customer Name: 
Comment Reference: LDP01/MIR/CONS/00187/4/054
Organisation: SEPA
(If applicable)
Comment Method: EMAIL
Customer Type: Key Agency

Verbatim Comment:
Former site compound (local plan H6)

No flood risk apparent.

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If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.5 Balloch

Customer Reference: 00187
Customer Name: SEPA
Comment Reference: LDP01/MIR/CONS/00187/4/053
Comment Method: EMAIL
Customer Type: Key Agency

Verbatim Comment:
Land north of Craigmolmond Gardens (local plan H5)
No flood risk apparent.

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.5 Balloch

Customer Reference: 00214
Customer Name: Transport Scotland
Comment Reference: LDP01/MIR/CONS/00214/1/005
Comment Method: EMAIL
Customer Type: National Government

Verbatim Comment:
Balloch: Sites ST5 and ST19 are identified as Sustainable Tourism sites, with ST5 offering the potential to support opportunities to add to Loch Lomond Shores. No further information is provided on what this would entail, therefore, we request further information to allow input to the Proposed Plan. ST19 is indicated as remove housing site to change to tourism / commercial. Impact and potential mitigation measures will need to be discussed with Transport Scotland.
### Main Issues Report

**Our Live Park Comments Received**

#### Chapter Commented on:

**5 Placemaking - What sites should be considered for development?**

- **>> 5.5 Balloch**

#### Customer Reference:

- **00144**

#### Organisation:

- Loch Lomond Steamship

#### (If applicable) Company

#### Customer Name:

- 

#### Comment Reference:

- LDP01/MIR/CONS/00144/1/011

#### Comment Method:

- EMAIL

#### Customer Type:

- Private Business

#### Verbatim Comment:

Flooding: Closer cooperation with Scottish Water is required as their barrier at Balloch is a key factor in flooding and flood prevention.

### Chapter Commented on:

**5 Placemaking - What sites should be considered for development?**

- **>> 5.5 Balloch**

#### Customer Reference:

- **00145**

#### Organisation:

- Scottish Water

#### (If applicable) Company

#### Customer Name:

- 

#### Comment Reference:

- LDP01/MIR/CONS/00145/1/004

#### Comment Method:

- EMAIL

#### Customer Type:

- Key Agency

#### Verbatim Comment:

Page 85, Balloch, there is currently sufficient capacity at Ardoch waste water treatment works to serve the developments set out in the Main Issue Report, however, there are some localised regarding Scottish Water infrastructure and early engagement is recommended with any potential developer.

---

*If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com*
5 Placemaking - What sites should be considered for development? >> 5.5 Balloch

A number of sites included in the Placemaking section of the MIR concern us as they either contain or are adjacent to ancient woodland and others contain, or are in proximity to, other woodland/wooded sites. These are listed in the attached table with reasons for our concern.

We OBJECT to the following sites being identified for further development since this will lead to the loss of ancient woodland and damage to ancient woodland.

We consider that these site allocations should not be taken forward unless the protection of the adjacent woodland can be guaranteed and therefore request that where the allocations are taken forward, sufficient buffering between the proposed development and woodland should be identified in planning policy at the appropriate stage.

We recommend that if any protected species are present on the development site or adjacent to the development site that the appropriate survey work is carried out to determine the impacts that the development may have on the populations.

ST5 Within the ancient woodland. (Moss o' Balloch plantantion)

Please see Appendix 6 for further information
5 Placemaking - What sites should be considered for development? >> 5.5 Balloch

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We recommend that if any protected species are present on the development site or adjacent to the development site that the appropriate survey work is carried out to determine the impacts that the development may have on the populations.

ST8   Within the ancient woodland (Moss o’ Balloch Plantation)

Please see Appendix 6 for further information
5 Placemaking - What sites should be considered for development? >> 5.5 Balloch

A number of sites included in the Placemaking section of the MIR concern us as they either contain or are adjacent to ancient woodland and others contain, or are in proximity to, other woodland/wooded sites. These are listed in the attached table with reasons for our concern.

We OBJECT to the following sites being identified for further development since this will lead to the loss of ancient woodland and damage to ancient woodland.

We consider that these site allocations should not be taken forward unless the protection of the adjacent woodland can be guaranteed and therefore request that where the allocations are taken forward, sufficient buffering between the proposed development and woodland should be identified in planning policy at the appropriate stage.

We recommend that if any protected species are present on the development site or adjacent to the development site that the appropriate survey work is carried out to determine the impacts that the development may have on the populations.

ST6 - Within the ancient woodland. (Moss o’ Balloch plantation)

Please see Appendix 6 for further information

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
A number of sites included in the Placemaking section of the MIR concern us as they either contain or are adjacent to ancient woodland and others contain, or are in proximity to, other woodland/wooded sites. These are listed in the attached table with reasons for our concern.

We OBJECT to the following sites being identified for further development since this will lead to the loss of ancient woodland and damage to ancient woodland.

We consider that these site allocations should not be taken forward unless the protection of the adjacent woodland can be guaranteed and therefore request that where the allocations are taken forward, sufficient buffering between the proposed development and woodland should be identified in planning policy at the appropriate stage.

We recommend that if any protected species are present on the development site or adjacent to the development site that the appropriate survey work is carried out to determine the impacts that the development may have on the populations.

ST19  Adjacent woodland adjacent to the site.

Please see Appendix 6 for further information
A number of sites included in the Placemaking section of the MIR concern us as they either contain or are adjacent to ancient woodland and others contain, or are in proximity to, other woodland/wooded sites. These are listed in the attached table with reasons for our concern.

We OBJECT to the following sites being identified for further development since this will lead to the loss of ancient woodland and damage to ancient woodland.

We consider that these site allocations should not be taken forward unless the protection of the adjacent woodland can be guaranteed and therefore request that where the allocations are taken forward, sufficient buffering between the proposed development and woodland should be identified in planning policy at the appropriate stage.

We recommend that if any protected species are present on the development site or adjacent to the development site that the appropriate survey work is carried out to determine the impacts that the development may have on the populations.

ST4 Within the ancient woodland (Moss o’ Balloch plantantion)

Please see Appendix 6 for further information
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.5 Balloch

Customer Reference: 00187
Customer Name:
Organisation: SEPA
(If applicable)
Comment Reference: LDP01/MIR/CONS/00187/4/057
Comment Method: EMAIL
Customer Type: Key Agency

Verbatim Comment:
Loch Lomond Shores/West Riverside (local plan ST6)

The River Leven is located on the eastern boundary of the site with large parts of the site at risk of fluvial flooding. We would therefore require a FRA which assesses the risk of flooding to the site from the Leven to ensure that built development is located outwith the functional floodplain and or adoption of appropriate flood management measures.

There are small burns nearby which may be impacted by the development. This is a large site so potential for detrimental impact. Opportunities to make improvements but need specific detail on proposal. Buffer strip required. Restoration could contribute to reducing RBMP morphology pressure.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
The condition of Balloch Castle is deplorable and is the worst possible advertisement for the national park. The same applies to the North Lodge. This would appear to be brought about by different public ownerships and priorities. Steps should be taken to resolve the ownership issue, including the estate and restore and re-use the buildings as a matter of urgency.

Areas ST8 are not problematic as far the B&HCC is concerned, being 'reserved' for tourism and recreation but most of these areas are presently bereft of any development now and possibly into the distant future. The plan should reflect this in comment and perhaps outline what could go on these sites even if based on previous failed development plans.
5 Placemaking - What sites should be considered for development? >> 5.5 Balloch >> 5.5.1

Balloch Question 1: do you agree with the preferred option? Why?

Customer Reference: 00038
Customer Name: Balloch and Haldane Community Council
Comment Reference: LDP01/MIR/CONS/00038/1/007
Comment Method: LETTER
Customer Type: Local Public Body

Verbatim Comment:
Areas ST7 are not problematic as far the B&HCC is concerned, being 'reserved' for tourism and recreation but most of these areas are presently bereft of any development now and possibly into the distant future. The plan should reflect this in comment and perhaps outline what could go on these sites even if based on previous failed development plans.
5 Placemaking - What sites should be considered for development? >> 5.5 Balloch >> 5.5.1

**Balloch Question 1:** Do you agree with the preferred option? Why?

**Customer Reference:** 00038

**Organisation:** Balloch and Haldane Community Council

**Customer Name:**

**Comment Reference:** LDP01/MIR/CONS/00038/1/005

**Comment Method:** LETTER

**Customer Type:** Local Public Body

**Verbatim Comment:**
Areas STS are not problematic as far the B&HCC is concerned, being 'reserved' for tourism and recreation but most of these areas are presently bereft of any development now and possibly into the distant future. The plan should reflect this in comment and perhaps outline what could go on these sites even if based on previous failed development plans.

---

5 Placemaking - What sites should be considered for development? >> 5.5 Balloch >> 5.5.1

**Balloch Question 1:** Do you agree with the preferred option? Why?

**Customer Reference:** 00038

**Organisation:** Balloch and Haldane Community Council

**Customer Name:**

**Comment Reference:** LDP01/MIR/CONS/00038/1/004

**Comment Method:** LETTER

**Customer Type:** Local Public Body

**Verbatim Comment:**
ST4. Supporting development of Balloch Castle is all very well, but action to make it a Balloch attraction worth visiting should be a top priority for all concerned.
To get back to Balloch and area H3 in the report. The CC has lobbied for years for this area behind the NPHQ to be retained as it is at present (not the present policy) but that policy be changed to open space and tourist car/coach & overflow parking, whatever policy number that comes under. We have stated so olen that just because it is looked upon as a gap site that housing has to go on it.

Balloch as far as the Community Council is concerned regarding new housing in this National park area - is full - and H3 taken off the local plan.

Luss Estates supports the preferred option - Balloch and its visitor traffic onto the loch have a huge effect on the economy of the whole loch, and as such development here is a good thing for the communities and economies further up the loch.
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.5 Balloch >> 5.5.1

Balloch Question 1: do you agree with the preferred option? Why?

Customer Reference: 00186
Customer Name:

Comment Reference: LDP01/MIR/CONS/00186/1/011
Comment Method: EMAIL

Organisation: Historic Scotland
(Customer Type: Public Body)

Verbatim Comment:
For the following site carried forward from the ALP, we recommend early engagement with HS on development proposals which may raise complex or significant issues for the assets listed below. This will be key to avoiding adverse impacts including respecting the site and setting and character of assets and optimising positive outcomes for the historic environment:

Balloch - ST8 Preferred existing site St Kessogs East Riverside

SM Balloch Castle, earthwork 3385, A listed Balloch Castle HB no 123, and Balloch Castle GDL
For the following site carried forward from the ALP, we recommend early engagement with HS on development proposals which may raise complex or significant issues for the assets listed below. This will be key to avoiding adverse impacts including respecting the site and setting and character of assets and optimising positive outcomes for the historic environment:

Balloch - ST6 Preferred existing site Lomond Shores/West Riverside

A listed Drumkinnon Bay, Balloch pier, slipway and engine house (HB no 46721)
Balloch Question 1: do you agree with the preferred option? Why?

Customer Reference: 00186
Customer Name: (If applicable)
Comment Reference: LDP01/MIR/CONS/00186/1/009
Comment Method: EMAIL
Customer Type: Public Body

For the following site carried forward from the ALP, we recommend early engagement with HS on development proposals which may raise complex or significant issues for the assets listed below. This will be key to avoiding adverse impacts including respecting the site and setting and character of assets and optimising positive outcomes for the historic environment:

Balloch - ST5 Preferred existing site Woodbank House

This site contains Category A listed building Woodbank House (HB 1125). This building is at risk and in a critical condition. Sensitive reuse of this building should be welcomed, but must be carefully managed to ensure that the special interest of the house and its setting are maintained and its long term future is ensured. A development brief or guidance to provide principles may be a useful tool in ensuring that development proposals are appropriate and tied to the restoration of the building. Proposals should be supported by evidence to show that the importance of the building and its setting has been fully understood and those features which contribute to its special interest have been identified.
The surprising omission of any reference whatsoever not only to the "Maid of the Loch" but also to a vision and associated policies regarding the future of the principal piers on Loch Lomond and their role in the Loch's tourism and water transport strategy have been outlined previously. Furthermore however, we are disappointed to note that the opportunity which exists for the refurbishment and redevelopment of Balloch Pier to enhance and improve existing tourism development and leisure facilities as well as strengthening the connection of West Riverside to the loch has not been highlighted.

Accordingly it is requested that the "Main Issues" to be addressed and considered in the new Local Development Plan be revised appropriately to identify and support this development opportunity on the site of the former station at the pier as was discussed with, and favourably received by, the Park Authority in November 2013. It will be recalled that the development was based on plans showing a passenger transfer and visitor facility on the structure to facilitate the return of the "Maid of the Loch" to commercial sailing.

It is not clear from the Main Issues Report what criteria have to be met for a potential development site to be awarded the status of a "placemaking priority" it is further requested that consideration be given to Balloch Pier to be so designated in any new Development Plan.

While noting that the revised boundary of Policy ST6 does not affect the interests or assets of LLSC, the amendment to the siting of the policy boundary for T3 north of Drumkinnon Bay and the related indication of "New Infrastructure to Support Water Transport" do not appear to incorporate Balloch Pier itself. It is requested that the "Main Issues" to be addressed by the new plan be revised to include an appropriate amendment to rectify this.
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.6 Balmaha

Customer Reference: 00040
Customer Name: Joe Twaddle
Comment Reference: LDP01/MIR/CONS/00040/1/007
Comment Method: OLDP

Verbatim Comment:
As mentioned previously, we think that there has been a gradual erosion of resident accommodation and tourism is perhaps too prominent. This will spoil experiences for everyone.

Infrastructure needs to be addressed, water transport integrated—a Rowardennan/Balmaha link? Paths could be better linked and Local history/geology used to give a greater insight to this historic, unique settlement.

Small scale tourist facilities only with the development of outdoor activities. What about a high level cycle route between Balmaha and Rowardennan --That would be spectacular!
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<td>Customer Reference:</td>
<td>00098</td>
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<tr>
<td>Customer Name:</td>
<td>Lorna Holl</td>
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<td>LDP01/MIR/CONS/00098/1/001</td>
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<td>Comment Method:</td>
<td>OLDP</td>
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Verbatim Comment:
I strongly object to planning permission being granted for the building of ten affordable homes and 5 self build plots on the road into Balmaha. This forested area is visible from the main road and from the Conic Hill and would spoil the approach into the village. It would also double the population of Balmaha and I don't think that it is a good idea to do this in one fell swoop.
I would like to protest about the proposal to build ten affordable houses and five more houses on self build plots on a currently forested site on the approach into Balmaha. Balmaha is a small settlement in an area of outstanding natural beauty. This new development would not only practically double the current population in one go but would also severely mar the forested approach into the village. The piece of land in question as it stands has regenerating birch woodland, as well as several mature trees, and is clearly visible from the Conic Hill. The removal of this woodland and the construction of fifteen houses would be very visible from the Conic.

Destroying this woodland to build houses would be a very short sighted step to take. The ten affordable houses will revert to the open market after ten years, at which point they would almost certainly be converted into B&Bs or yet more holiday homes. Recent and current building projects in the village have turned out to be just that. If there really was such a need for affordable housing, why were these plans for holiday homes allowed to go ahead? There are two zones in Balmaha where affordable housing could be built; one of them is appropriately in the heart of the village and requires no trees to be felled. The government has clearly stated its intention to have more houses built, but some consideration must be given to their location. This is a National Park for a reason and if we do not preserve and protect it, why bother to give it National Park status? Once these houses have been built, the approach into Balmaha will have been spoiled forever.

Another serious concern is the discharge from these fifteen houses into the tiny stream which runs off the Conic Hill, down the side of our property and then crosses our garden further down. This has an inevitable impact on the pollution downstream. The houses on the north side of the road already discharge a somewhat smelly effluent into this stream. What impact will fifteen more have? I am concerned about the ability of this usually very small flow of water to cope adequately with the dilution of the added effluent. (At present, the stream is little more than a trickle), We were very excited to see water voles at the bottom of our propedy two years ago. What impact will this pollution have on them? The mouth of the Endrick Water is an SAC as well as an SSSI for a good reason. Surely it should be a National Park priority to safeguard this area or these designations are meaningless. They are not only water voles in the area, but osprey, river lamprey and otters as well. I regularly see osprey fishing successfully in the loch at the Endrick mouth, and I came home very late one night to find an otter crossing the road from our drive and disappearing into the stream over the road. I contacted SNH the next morning to let them know what I had seen and they confirmed that otters do sometimes forage upstream away from the loch and that this was not unusual behaviour. However, it is very unlikely that an otter would choose to wander into a housing estate. This will obviously have a negative impact on their freedom to range.
There is a red squirrel feeding station in the plantation at the foot of the Conic Hill and I often see red squirrels when I walk in that area as well as the remains of the pine cones which they eat. They come over the road to our property, so they are coming through the plot of land earmarked for development. Red squirrels are cherished and protected in other parts of the British Isles. Why isn't it a priority to safeguard them in our Park as well? I have on several occasions found slow worms curled up in a sunny spot right on the plot of land in question and have taken photos of them, There are also toads, frogs and newts in the area. These amphibians are protected; surely it is the Park's responsibility to be aware of their presence and to protect them.

There are bats, protected under Schedule 5, nesting in the area. Unfortunately, I am unable to say that they are nesting right on the site, which would put a stop to any building plans, but there are several mature trees growing there, so the possibility cannot be ruled out. An Environmental Impact Assessment would establish whether bats are nesting there or not. Bats as well as Tawny Owls are seen and heard every evening in Balmaha. There is a carpet of bluebells under the power lines on this site, which would be cleared if the project goes ahead. This is a very pretty sight through May and it would be a huge loss if it were to go, This glade under the power lines also attracts butterflies.

At the moment, this area is obviously seen by the Community Council, the National Park and the Forestry Commission to be nothing but a plot of scrub wasteland awaiting development. These must be people who have not actually made the effort to get to know this piece of land. I, however, live where I can see this woodland every day and see the regenerating and flourishing woodland as something live and valuable and very much worth preserving. This is where I live and I care very much about the flora and fauna in the area and will do my very best to protect and save them from disturbance and destruction. I would like to be able to say the same about the National Park.
5.6 Balmaha Forestry Commission Site, Opposite Ben Lomond Nursery, Balmaha (MIR 24)

A minor watercourse runs along the eastern edge of this site, this poses a potential risk of flooding. A basic FRA will be required either prior to, or in conjunction with any planning application. This will need to define the areas at risk of flooding, the relative vulnerability of the proposed use and confirm design layout and levels. We would be likely to object to the development of this site unless appropriate additional information is submitted / the site plan is amended to remove the sections thought to be at risk.
5 Placemaking - What sites should be considered for development? >> 5.6 Balmaha

1. PREFERRED OPTIONS:

"Housing": Support but with Residency Conditions applied ensuring fair application between local people

Improved infrastructure/Water transport"; Unsure what this means - could not find in Local Plan proposal

"Cycle path/footpath bwt Drymen/Balmaha"; Disagree (Where? How? Cost???)

"Masterplan preparation"; Sounds faintly sinister. Disagree - unless ALL local residents are consulted

2. ALTERNATIVE OPTIONS FOR BALMAHA?

With reference to the issues stated in the MIR - consider more carefully these already existing problems that need dealing with first; struggling roads/carparks/lack of toilets - Develop THESE before any other unnecessary follies.

LISTEN to the smaller voices of local residents (and boatowners & anglers who use the loch the most & spend locally but who are afforded the least consideration in the trample of attracting tourists) and not simply the loudest commercial clamour.

Balmaha is gathering a reputation for being over-developed (people already telling us they avoid visiting in pleasant weather) and is bemoaned as a once charming quiet sweet little village - now completely over-reaching itself into a holiday complex of transient tourists.

There should be NO MORE development in Balmaha with the exception of toilets and extra carparking.

More development would be overkill - Balmaha is at risk of killing the goose that lays the egg.
The proposals in the MIR for Balmaha/Drymen could essentially undermine the whole protected status of being in a national park. Reading through it appears to have been initiated from political environs to suit the governing administration. I once thought the National Park had been established to PROTECT the park for the future (this being the fundamental purpose of the NPA?) not potentially sacrifice scenic sites in an experimental easing of rules for local business agendas?

This is very worrying especially after personally experiencing NP Planning poor judgement and unhelpful professional services recently. This does not fill us with trust and great expectations for a future experimental approach to "relaxing" planning rules and decision making.

It is of concern that the MIR values 'development' above all else - including 'conservation' - always mentioned as an afterthought/a tiresome inconvenience.....I fear MIR will be an erosive effect on the standards used for protection in the National Park.

Balmaha bay and boatyard have mercifully remained free from crass overdevelopment - yet curiously appear to be one of the most frequently photographed locations within the national park; often used by all and sundry to promote their local businesses

It is with serious dismay that we see the very people put in place to protect the park appear willing to alter their precious charge beyond recognition purely in the pursuit of commercial objectives.

And it is of very serious concern to see Loch Lomond with such exploitative guardians circling overhead.

PROCEED WITH CAUTION.
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.6 Balmaha

Customer Reference: 00213
Customer Name: Stirling Council
Comment Reference: LDP01/MIR/CONS/00213/1/006
Comment Method: EMAIL
Customer Type: Local Government

Verbatim Comment:
Balmaha
While the concept of a footpath and cycle path between Balmaha and Drymen is supported, it is unlikely to provide a solution to the acute traffic problems that exist in this locality on a limited number of days each year.

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.6 Balmaha

Customer Reference: 00127
Customer Name: M And M Quality Homes
Comment Reference: LDP01/MIR/CONS/00127/1/002
Comment Method: EMAIL
Customer Type: Private Business

Verbatim Comment:
To demonstrate this support, the LDP should identify land behind Montrose House as a preferred site. The land has planning permission for 17 holiday apartments (97/00047/DET/S). Development commenced in August 2004.
Page 88. Balmaha; there is currently limited capacity at Scottish Waters Balmaha waste water treatment works. However, should there be insufficient capacity for development at our water or wastewater treatment works (part 4 assets), Scottish Water will provide additional capacity if the developer can meet the following criteria:-

1. The development is supported by the local plan and has full planning permission. If the capacity in the Scottish water system is the only reason preventing a development gaining full planning then outline planning would be accepted.

2. The developer can confirm land ownership or control through a solicitor’s letter.

3. The developer can confirm plans are in place to mitigate any network constraints that will be created by the development through a minute of agreement with us or alternatively a letter showing commitment to mitigate network impact through part 3 investment.

4. The developer confirms any time remaining on current planning permissions with the local council.

5. The developer can demonstrate reasonable proposals in terms of the development’s annual build rate.

As previously mentioned, Scottish Water are happy to participate in any masterplans for the area.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
A number of sites included in the Placemaking section of the MIR concern us as they either contain or are adjacent to ancient woodland and others contain, or are in proximity to, other woodland/wooded sites. These are listed in the attached table with reasons for our concern.

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We recommend that if any protected species are present on the development site or adjacent to the development site that the appropriate survey work is carried out to determine the impacts that the development may have on the populations.

**BALMAHA - Within the ancient woodland (Balmaha Plantation)**

**MIR24 - Within the ancient woodland (Balmaha Plantation)**

Please see Appendix 6 for further information
5 Placemaking - What sites should be considered for development? >> 5.6 Balmaha

Balmaha is a success. It does not need much alteration or improvement as it is already very popular with its huge car park, often filled, with the Loch, its' scenery and the "West Highland Way" attracting visitors and tourists all the year round.

What does need improvement is the infrastructure with the roads from Drymen a priority along with the forest and cycle paths which fall well below the standards set in the continent.

Support for those already living in the National Park.
Developments should only take place if they do not detract from the Capital Value of established property and land surrounding the development.

People living in the National Park rely on the National Park Organisation to look after their interests and that should never be forgotten.

Planners of the National Park have to be more aware of the long term implications of the plans they approve and this includes light and sound pollution.

We have been very badly affected by the development you have authorised:-

Loch Lomond Luxury chalets hold weddings and dances right on our perimeter fence with very loud music going on to midnight.

Lomond Bank on our West side has built a barn 2 feet from our boundary fence ostensibly for agricultural purposes but the grass is three feet high and little or no agricultural development has taken place. Now a large extension to the house is taking place without even consulting us as next door neighbours. We have no idea what lies afoot.

Should we not have been consulted?
Main Issues Report Our Live Park Comments Received

Your staff advised us to apply for the building to be taken down if it was not used according to the planning approval. Should we not do this?

Affordable Housing

There are plans to build affordable housing directly across the road from us. This development will alter the balance of the village.

It is odd that I first heard of this in the "Oak Tree News" where the plans were published. I thought the plans were the responsibility of the Park Authorities and not of individuals and to view it otherwise leads to a conflict of interest. It will also lead to :-

Destruction of Wild Life habitat

The plans envisage using forestry land opposite our house which will adversely affect the 61 different bird species that come to our garden. Same applies to the roe deer and red squirrels who also visit; in fact one has just come in as I write. See attached list.

There is spare land south of the Oak Tree premises, between the houses and the loch or at the back of the Former Highland Hotel. Ref 2011/0245D8T- former Highland Way Hotel Project-seems to have stalled and having written to you before and have heard no more.

What is happening here?

Summary

General
Balmaha gives the tourist a good experience as it is, and needs little change just completion of the Highland Way Hotel project or an acceptable alternative and investing in infrastructure projects.

Park Authorities
Must consider the financial and environmental implications of their actions and keep locals informed of what is happening.

Affordable Housing
Alternative sites should be investigated. (APPENDIX ATTACHED)

Please see Appendix 5 for further information

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
5 Placemaking - What sites should be considered for development? >> 5.6 Balmaha

Customer Reference: 00187
Customer Name: Organisation: SEPA
(If applicable)
Comment Reference: LDP01/MIR/CONS/00187/4/072
Comment Method: EMAIL
Customer Type: Key Agency

Verbatim Comment:
Water environment developer site requirements and comments: Buffer strip required, there may be restoration opportunities. Looks as if this an upgrade to existing infrastructure. Loch Lomond has morphological pressures and more structures will add to this. Seek to get the existing ones and new to reduce morphological impact. It is recognised this will be small scale. CAR engineering aspects to be considered.

5 Placemaking - What sites should be considered for development? >> 5.6 Balmaha

Customer Reference: 00209
Customer Name: Organisation: Scottish Campaign for National Parks
(If applicable)
Comment Reference: LDP01/MIR/CONS/00209/1/009
Comment Method: EMAIL
Customer Type: Other Organisation

Verbatim Comment:
Preferred option is generally acceptable and we support the proposal to prepare a masterplan framework. We are concerned that there is no justification given for MIR24 which because the area shown can only be regarded as a search area as it is far bigger than necessary for 10 houses.
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.6 Balmaha >> 5.6.1

Balmaha Question 1: Do you agree with the preferred option? Why?

Customer Reference: 00093
Customer Name: Scottish Natural Heritage
Organisation: (If applicable)
Comment Reference: LDP01/MIR/CONS/00093/1/015
Comment Method: OLDP
Customer Type: Public Body

Verbatim Comment:
The preferred option text on page 88 does include ‘support for improved footpath and cycle path connections to Drymen’ however this does not appear on the proposals map. We consider this to be a significant omission. A key element of the findings from the Balmaha/Drymen Charette was that a better off road link between Balmaha and Drymen was needed to the south of the B837. This ‘key initiative’ is set out on Page 65 of the Charette report for Balmaha and Drymen. It involves promoting use of existing path network south of the B837 and incorporating opportunities to experience the National Nature Reserves at Endrick Mouth. However, the only off road route on the Balmaha map is the West Highland Way. We would be happy to advise on the scope of a Masterplan framework for Drymen so opportunities to access and appreciate the natural heritage of the nearby NNRs can be made.

Balmaha Question 2:

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.6 Balmaha >> 5.6.1

Balmaha Question 1: Do you agree with the preferred option? Why?

Customer Reference: 00218
Customer Name: Rural Stirling Housing Association
Organisation: (If applicable)
Comment Reference: LDP01/MIR/CONS/00218/1/008
Comment Method: EMAIL
Customer Type: Other Organisation

Verbatim Comment:
We agree with the proposal to allocate the Forestry Commission-owned site for development by RSHA. However, as indicated above, this will only be viable if allowance is also made for also developing five private plots at this location.
Balmaha Question 1: Do you agree with the preferred option? Why?

Q.1
Tarbet pier appears to be excluded from any preferred site. We recommend the pier be included within the masterplan placemaking priorities as this is a key feature for water transport, and could link well with the option of increasing links to the train station.

Balmaha Question 2: Do you have any other alternative options for the future of Balmaha?

Verbatim Comment:
Enhanced village centre is laudable and should include an element of local history. Local history initiatives need co-ordination and support to realise the wonderful range of experiences within the Park boundaries.
The loss of the public toilets at the main car park in Balmaha is something that should be rectified when you consider the number of visitors and campers. There are areas of the woods which are now open air toilets.
<table>
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<tr>
<th>Customer Reference:</th>
<th>00127</th>
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<tr>
<td>Customer Name:</td>
<td>M And M Quality Homes</td>
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<tr>
<td>Comment Reference:</td>
<td>LDP01/MIR/CONS/00127/1/003</td>
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<td>Comment Method:</td>
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<td>Customer Type:</td>
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**Chapter Commented on:** 5 Placemaking - What sites should be considered for development? >> 5.6 Balmaha >> 5.6.2

**Customer Reference:** 00127  
**Customer Name:** M And M Quality Homes  
**Comment Reference:** LDP01/MIR/CONS/00127/1/003  
**Comment Method:** EMAIL  
**Customer Type:** Private Business

_Balmaha Question 2: Do you have any other alternative options for the future of Balmaha?_

If the Local Planning Authority no longer supports tourism development on the land behind Montrose House, then the land should be the preferred option for new housing, instead of MIR24. MIR 24 is woodland that makes a positive contribution to the landscape and setting of Balmaha. Object to MIR24 as a new housing site as it will involve the loss of mature woodland. Trees capture carbon making the loss of trees incompatible with the principle of sustainable development in Scottish Planning Policy (2014).
Mr George Cruickshank owns Gart Farm, which is situated on the eastern edge of Callander. It extends from the A84 to the River Teith, and is shown identified in red on the OS plan enclosed.

Most of the land forming Gart Farm is subject to ongoing gravel extraction by CEMEX, which is due to continue until c. 2023, other than the following two areas:

- A field that borders the adjoining Gart Caravan Park to the north west; and
- The six dwellings and farmyard, situated close to the River Teith, and lying immediately south of the category C listed Gart House.

Both of these areas are separately identified on the OS plan, in yellow and purple respectively. Access to the Farm is via a private access from the A84, the ownership of which is shared with the owners of Gart Lodge, which fronts the main road, and Gart House.

The farmyard area, which contains six existing dwellings and agricultural buildings, is easily definable on the grounds, and has immediate potential for development.

In the meantime, the remaining land forming Gart Farm is currently the subject of ongoing gravel extraction, which is creating a lake that, in places, will be 20 metres deep. This will mean that most of the remaining agricultural land associated with Gart Farm will become part of an extended waterbody, and there will be no reason to retain any agricultural buildings, which will be redundant, and can be demolished leaving the farmyard site vacant and available for redevelopment.

The entirety of Gart Farm is currently identified within the Local Plan as Opportunity LT1 as a possible long-term sustainable tourism development for a "Large-scale tourism resort including hotel/spa, self-catering/timeshare development" with "Recreational activity relating to low key walking/cycling and possible golf course or equestrian uses".

The only heritage designation shown on PastMap is Gart House, which is situated immediately north of the Gart Farm farmyard, but is largely hidden from view by a high
wall, earth embankment and trees.

The land comprising Gart Farm has no biodiversity designations shown on SiteLink, although the River Teith is a Special Area of Conservation Parts of the land, close to the River Teith, are included within the SEPA indicative floodplain, and as further identified in the Callander River Teith Optioneering and Benefit / Cost Appraisal (June 2013) produced for Stirling Council.

The Callander Landscape Capacity Study for Development (March 2013) shows Gart Farm as falling within two separate Local Landscape Character Areas. The northern part is within LCA zone 5 Gart Parkland, and the southern part within LCA zone 6 Cambusmore Quarries. This document concludes by suggesting that the landscape has high/medium sensitivity to change (LCA zone 5) and medium sensitivity (LCA zone 6), with the northern part of LCA zone 5 shown as having potential for housing and recreation, and the majority of zone 6 being suitable for recreation.

Main Issues Report (MIR)

The MIR identifies Gart Farm as forming part of a potential large scale tourism resort, which is supported by Mr Cruickshank. The only comment in that regard is that the boundaries of this area should be identified on the Proposed Plan Proposals Map, and should specifically include all of the land shown as belonging to Mr Cruickshank, and any other land owned by others that would be appropriate to include, i.e. the remaining land also subject to gravel extraction.

The MIR does not identify the Gart Farm farmyard area, as identified in purple on the OS plan, as suitable for housing, despite the fact that it already contains a number of dwellings, is a brownfield site, and has the potential to be redeveloped for perhaps upwards of 10 new dwellings, which would have a superb outlook over the new water bodies already existing/ and being created by ongoing gravel extraction.

As the farmyard is not subject to any constraints, and has a suitable access to the A84, it would be sensible, therefore, to include it as a housing allocation.

The last matter that warrants discussion, in relation to Gart Farm, is the future of what can be termed Callander east.

This area was considered as part of the recent Callander Charrette Report, and was also considered as part of the previous Local Plan examination, but the MIR includes little as to how this area should develop longer term, and instead concentrates on an alternative area for development to the south of the town centre. The only mention of Callander east being in terms of Option 3 – Longer term development strategy (2021+), which mentions that longer term growth in the preferred location, will be dependent on a new road from the A84, and a new bridge over the river. Two options for this new road are suggested, the first through an area identified in the MIR as ED3, to the north west of Gart Caravan Park, and the second through the caravan site itself, which is where the new road is shown in the Charrette Report.

If the second option for the new road is chosen, then this will lead to significant changes occurring in relation to east Callendar because it will throw into doubt the long term future of the caravan site, but at the same time will open up wider opportunities for new development.

In terms of the caravan site, it may be that this could continue to operate notwithstanding the loss of perhaps of quarter of it to a new road, but more likely it puts in
Main Issues Report Our Live Park Comments Received

longer term future in doubt, and what might be a better idea is for the remainder of this area to be considered for housing development instead.

There are two reasons for this alternative option of housing. Firstly, although the land for the road could be compulsorily purchased, it is far better, and easier, to come to a voluntary agreement with a landowner. It may well be the case that this will be easier with the remaining land having an enhanced value, as residential land, rather than simply being valued as a caravan site. Secondly, it is suggested that this new road and bridge will need to be funded by developer contributions. This is not uncommon these days, but given the significant cost involved, it is suggested that the limited extent of housing development currently being promoted in the MIR will not be able to fund this, and also the other abnormal costs of developing the actual sites identified. Even with all the MIR proposed development in Callander contributing, and the greater level of development proposed in the Callander Charrette Report being accepted and also subject to payments, it is still unlikely that this will be enough, and so allowing further housing development at Callander east represents an obvious source of additional funding.

Housing on the caravan site is not a new idea, and was indeed being promoted by the Park Authority in the Local Plan until the Plan was examined, and the reporter concluded that it would be premature to consider redeveloping this area for housing, when it was not obvious where a similar tourism facility could be relocated to. That issue can be addressed by the fact that part of Gart Farm offers the potential for a new caravan site, once gravel extraction has been completed, and can, therefore, help overcome what was clearly the main (possibly only) stumbling block to this area being released previously. Furthermore, the field that forms part of Gart Farm, and which lies immediately south west of the caravan site, as shown in yellow on the enclosed OS plan, offers an obvious extension of what could be a new housing allocation identified either side of a new road. Development opportunities for inclusion in the Proposed Plan Based upon the above, it is suggested that the following opportunities be included in the forthcoming Proposed Plan.

1. All of the land owned by Mr Cruickshank, and other land as appropriate, is identified as a major tourism resort.

2. The area shown in purple on the OS plan enclosed should be identified as an immediate/short term housing allocation.

3. The areas shown in purple and yellow on the OS plan enclosed should be identified for housing, as part of a Callander east housing-led expansion area. The remainder of the landowned by Mr Cruickshank can otherwise be identified as a major tourism resort, to include a possible replacement caravan site for the loss of the existing Gart Caravan Park. (LOCATION MAP ATTACHED)

Please see Appendix 9 for further information

If you feel any information in this report is incorrect please contact us by email at hello@ourlivelpark.com
Felsham is planning adviser to Mr and Mrs M Luti. We are instructed to make a submission to the consultation of the draft Local Development Plan in support of the continued allocation of land at Churchfields for housing.

Churchfields is allocated for up to 30 houses under policy HSG12 of the Local Plan. The allocation follows initial recognition that the site is suitable for development in the Stirling Local Plan First Alteration 2003. In addition, there is consent for up to 30 houses granted on 18th August 2010 2008/0376/FUL. Therefore, the site has been recently assessed in a number of forums and the conclusion has been that it is acceptable for the grant of planning permission which was subsequently confirmed by the grant of planning permission.

Mr and Mrs Luti wish to continue to promote the site within the development plan and we are instructed to make a submission under Section 1 of the consultation Key Issues in support of the continued allocation of land at Churchfields Callander.

There has been no change in circumstance since August 2010 that indicates that a different decision should be taken in respect of both the allocation of the site and the maintenance of its planning consent. The site to be suitable, available and viable because:

- Ownership: The site is in the ownership or control of a single party.
- Physical: The site is free from constraints relating to slope, aspect, flood risk, ground stability or vehicular access which would preclude its development.
- Contamination: The previous use has not resulted in contamination or, if it has, the contamination can be readily remediated without impacting on viability.
- Deficit Funding: no public funding is required to make the site economically viable.
- Marketability: The site can be developed in the period under consideration.
Main Issues Report Our Live Park Comments Received

- Infrastructure: The site is either free from infrastructure constraints or any required infrastructure commitments can be readily delivered without impacting on viability.

- Land Use: Housing is an acceptable use for the site in planning terms.

Principle of Development

The grant of consent for application 2008/0376/OUT establishes the principle of the suitability of the subject site for development, within the boundaries of the stamped approved plans.

The Committee Report dated 10th August 2010, notes at paragraph 7.11 that the alteration 1B of the Stirling Council Local Plan allocated the entire site for housing, and that this allocation had been proposed since 2001. Subsequently, the site was included as an effective housing site within the Housing Land Audit. The site was subject to a rigorous process of assessment following submission of the planning application reference 2008/0376/OUT in December 2008. A considerable number of objections were made, largely emanating from a small group that made repeated objections. These objections were considered in detail by the Planning Officers and the applicants were asked to respond to each point raised. That process took in excess of 18 months. At the end of the process, the Planning Officers were satisfied that the site was suitable for development and recommended that the Committee should grant consent. The Committee accepted that recommendation.

Reasons for Seeking LDP Allocation

In granting consent, the Committee accepted that this is an effective residential site that is suitable for the development proposed. Given that Scottish Planning Policy (SPP) requires the Development Plan to provide clarity in respect of the housing land supply, it is important that extant consents are reflected in the Local Development Plan list of suitable housing sites, and associated policy. The planning consent lasts for 3 years and it is the applicant’s intention to implement the consent. However, current economic circumstances mean that it is difficult to be certain about the precise timing for implementation. The process of considering the past planning application resulted in a thorough analysis and the conclusion reached by the Planning & Access Committee of the National Park Authority, following advice from their Officers, that the site was suitable for development. Given this past history, we see no reason why the Local Development Plan should not mirror the Local Plan and also specifically allocate the site.

Way Forward

Following our update meeting with Iain Nicholson and Stuart Mearns of your authority on 1st May 2014 we wish to confirm the following:

1. My clients welcome the Main Issues Report proposals for Callander.

2. My clients welcomed the identification of Churchfields as part of the housing land supply and the identification of Churchfields as site HSG12 in the Local Plan.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
Main Issues Report Our Live Park Comments Received

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<tr>
<td>1.</td>
<td>There has been no change of circumstance that this allocation should not be carried forward into the LDP.</td>
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<td>2.</td>
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<td>3.</td>
<td>My clients confirm their continued support for site HSG12 and their willingness to work with the Park Authority and other landowners to achieve the wider strategic aspirations for the area.</td>
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<td>4.</td>
<td>My clients welcome the reduction of the affordable housing requirement to a maximum of 25% and the use of commuted sums as an alternative to on-site provision.</td>
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<td>5.</td>
<td>My clients welcome the further development proposals to the south of the school.</td>
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<td>6.</td>
<td>My clients wish to see land within the wider development proposals to the south identified for school expansion.</td>
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<td>7.</td>
<td>Any future road bridge and footpath associated with this wider development area should provide connections to site HSG12, Churchfields.</td>
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A gateway town to the park with no toilet facilities after 6 pm is terrible. Callander attracts many elderly people who I meet in the evening distressed that they cannot find a toilet. They ask where is the comfort station signposted. Its only open Monday to Friday 9 - 5 closed weekends and HOLIDAYS.

£3 to park in car parks e.g. Ben A'an. Why when others e.g. Cairngorm charge £2, also forestry Commission run.

Callander Crags a popular viewpoint totally destroyed by ugly fencing. Fences going up in other mountain areas with no or unmaintained styles obstructing access to wild country.

The town is dying. No small business can afford the costs involved. Last a couple of years then fold.

Car parking cheaper in Glasgow city centre. Fort William and Fife do not charge in winter to attract visitors.

St Kessogs should be the heart of the town. Turn it in to a community hall like McLaren at Killin.

The church hall is too restrictive, not permitting bar facilities. We have no suitable place for functions, bringing in evening entertainment like Killin does.

I travel a lot in Scotland and see how much better communities do, e.g. Moray coast, Dumfries, Fife, catering for visitors. without a national park.

When are we getting our railway? Time to get real and deal with what matters to those of us who stay in the park. Being green is ok. However who is going to cycle in the rain, fit to cycle up our hilly roads or risk the dangerous A 84 Main Street.

We want free parking to attract visitors, certainly off season. We have an increasing elderly population in the town and immediate area, not disabled, but cannot walk far, who need parking to use the shops. At the moment they just drive to Stirling where they get free parking at the large supermarkets.
Main Issues Report Our Live Park Comments Received

We need good toilets 24 hours, and employment opportunities for our kids which can be provided by making it affordable for small businesses to be viable.

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.7 Callander

Customer Reference: 00107
Customer Name: Non Attributable
Comment Reference: LDP01/MIR/CONS/00107/1/005
Comment Method: ONLINE
Organisation: (If applicable)
Customer Type: Information not available

Verbatim Comment:
"McLaren Community Leisure Centre (MCLC) believe that it is important the priorities of the plan and the options to be progressed, help structure and support an overall view of the whole of Callander and its future development. Therefore we feel the preferred options should be amended to reflect more of an emphasis on the needs of the whole community as defined in the Charrette and subsequent action plans.

We refer to the need to identify visitor attractions and from the Charrette, the need for an outdoor hub in Callander. MCLC can contribute significantly to both of these objectives. As referred to in the Community Action Plan developed from the Charrette.

Priority 3 Health and Leisure - identifies the need for an enhanced offering at the MCLC.

Priority 4 - Outdoor hub and Events arena - identifies the need to develop the use of existing facilities for promoting the outdoors and proving facilities for Highland games and other events. The facilities already provided at the MCLC are important strategic assets and can contribute to delivering on these priorities. In addition the walking and cycling path access across Callander should be considered as one of the key priorities to ensure there is sufficient capacity for existing users. Community walking and cycling links should not be prioritised for only new development.

MCLC feel it is important that these priorities are reflected in the local plan.
5 Placemaking - What sites should be considered for development? >> 5.7 Callander

"I would agree with keeping the road access for MIR39 and ED3. I would not agree with siting a new road anywhere else. It would not be sustainable.

I do not agree with option 3.

I agree with ST9 continuing with the tourism allocation, but would suggest that since it is a brown field site, it should be suitable for housing as to build expensive tourism buildings it requires considerable finance for which developers require a source of finance such as housing to move forwards on. Why should MIR 37a and MIR 37b, which are green field sites and require considerable infrastructure expense to develop been allowed houses when a far more suitable site is not.

I agree with RA1 continuing with the designation as a Rural activity area, however part of this land would also be suitable for housing as this is also ex-quarry land and not pristine green field.

The entrance to the Gart, makes a long term tourism oppertunity at Gart Farm not possible as it would interfere with the protected trees at the entrance from the A84 and also affect the character of the entrance, narrow tree lined driveway and historic park land of the Gart Estate. It would also damage the terminal morraine on which the protected trees are growing. The long term tourism opportunity should remain as previously identified in Cambusmore quarry.

The other site marked out for long term development oppportunity on the Clash Farm land is also not sustainable with the need for the extensive increase in infrastructure which would be required. The Claish is also a site of Scottish national historic importance so it is surprising that this has been selected as a site for future development when there are other ex-quarried sites at the edge of Callander, which would not require such dramatic expensive infrastructure works to realise."
MIR37a New Preferred Option & MIR37b New Alternative Option, Claish Farm

As noted above we previously returned comments as part of a call for sites exercise and also a design concept consultation in 2013. This consultation was based on a larger development area, and in our response we raised concerns that should the site become a preferred allocation, it must be demonstrated that any activities undertaken within it would not have an impact on the following four scheduled monuments located within in the south-eastern part of the development area:

SM 6968 Claish Farm, palisaded enclosures and timber hall
SM 6966 The Clash, palisaded enclosure
SM 6967 The Clash, enclosure
SM 6972 Lots of Callander, palisaded enclosures

We also recommended that the four monuments be excluded entirely from the allocation in order to protect them and their setting.

We note the MIR indicates that a part of the NW area of this previously consulted on larger development area has been allocated as MIR37a, and the scheduled monuments are fully excluded entirely from this allocation, being located out with the allocation boundary to the S/SE and within approximately 250 - 500m of the development. Given the proximity of the monuments to the development there is potential for direct impacts during construction processes as well as impacts to setting. We would expect the development to be designed to avoid or mitigate adverse impacts on the site or setting of the monuments. In the event of this allocation being brought forward into the Proposed Plan, we would wish to be consulted in due course on any master plan and we would be happy to offer further advice and discuss mitigation options.

MIR37b

The Roman Camp GDL is also within the vicinity this allocation. In terms of potential setting impacts on the Roman Camp GDL the application of national and appropriate local development plan policies should ensure any adverse impacts are mitigated.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivelpark.com
Post flood survey undertaken in Callander after January 2005 and December 2006 floods. Aerial photographs included. Photos illustrate flooding in the fields around Claish Farm during both the 2005 and 2006 floods; it is unknown when the photographs were taken in relation to the peak.

We would require a FRA for the site to assess flood risk from the River Teith and the numerous small un-named watercourses within the site. We would highlight that large areas of the site may not be developable.

All Callander Sites: Foul Drainage comments
Callander sewage treatment works is hydraulically overloaded. The opportunity to remove surface water from the combined sewer should be taken. The applicant should discuss connection to the public sewer with Scottish Water.
5 Placemaking - What sites should be considered for development? >> 5.7 Callander

Lagrannoch Industrial Estate, Callander

Post flood survey undertaken in Callander after January 2005 and December 2006 floods. Includes aerial photographs. Flooding issues have been recorded at Gullipen View to the north-east of the site and related to flooding of the Mellis Burn (photographic evidence taken 2004). A piped watercourse is known to be located within the site.

Part of the site is within the IRCFM flood boundary. We are supportive of the proposal for the use of the site as a storage area. Should there be any change of use we would require a FRA to assess flood risk at the site from the River Teith. Consideration should be given to upstream/downstream culverts and structures which may exacerbate flood risk. Consideration should be given to PAN 69 which states that "buildings must not be constructed over an existing drain (including a field drain) that is to remain active".

All Callander Sites: Foul Drainage comments

Callander sewage treatment works is hydraulically overloaded. The opportunity to remove surface water from the combined sewer should be taken. The applicant should discuss connection to the public sewer with Scottish Water.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.7 Callander

Customer Reference: 00187
Customer Name:

Comment Reference: LDP01/MIR/CONS/00187/4/041
Comment Method: EMAIL

Organisation: SEPA
Customer Type: Key Agency

Verbatim Comment:
Land at Trean Farm, Callander FK17 8AS

Post flood survey undertaken in Callander after January 2005 and December 2006 floods. Includes aerial photographs.

We would require a FRA for the site to assess flooding from the small un-named watercourse and the River Teith. Consideration should be given to PAN 69 which states that "buildings must not be constructed over an existing drain (including a field drain) that is to remain active". Consideration should be given to upstream/downstream culverts and structures which may exacerbate flood risk.

All Callander Sites: Foul Drainage comments
Callander sewage treatment works is hydraulically overloaded. The opportunity to remove surface water from the combined sewer should be taken. The applicant should discuss connection to the public sewer with Scottish Water.
5 Placemaking - What sites should be considered for development? >> 5.7 Callander

Balgibbon Callander FK17 8LE (site M31)

Post flood survey undertaken in Callander after January 2005 and December 2006 floods. Includes aerial photographs. Mellis Burn causes flooding problems downstream. Insufficient capacity of the culvert on the upstream side of the cycle track could result in flooding of the site should blockage occur however capacity was doubled in 2004.

We require a FRA to assess the risk of flooding from the small un-named watercourse. Whilst we appreciate that the capacity of the culvert has been doubled, the risk of flooding as a result of blockage should be assessed.

North of Lagrannoch Drive Callander (Site 32)
Post flood survey undertaken in Callander after January 2005 and December 2006 floods. Includes aerial photographs.

The site is on a slope therefore there may be a risk of flooding from surface water runoff. We recommend that appropriate mitigation measures are implemented to reduce the risk of flooding from this source.

All Callander Sites: Foul Drainage comments
Callander sewage treatment works is hydraulically overloaded. The opportunity to remove surface water from the combined sewer should be taken. The applicant should discuss connection to the public sewer with Scottish Water.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivelpark.com
5 Placemaking - What sites should be considered for development? >> 5.7 Callander

Auchenlaich, Cambusmore Estate (Currently ST9 in Adopted Local Plan)

Photographs demonstrate ponding of flood water on the site during the flood event of January 2005.

We would require a FRA for the site in order to determine the flood risk from the small un-named watercourse which is located within the site. Consideration should be given to upstream/downstream culverts and structures which may exacerbate flood risk. Development will be constricted at this site.

Site ref. 59 Auchenlaich, Cambusmore Estate The foul sewage from this site should be connected to public sewer (200m away) this could link in with foul sewage from Callander East site (RA1) and also allow existing developments at Keltie Bridge (14 houses) and Keltie Bridge caravan site to be connected to the foul sewer. Private sewage discharges are likely to exacerbate existing phosphorus pressure on River Teith SAC.

Water Environment: There is a ditch which flows through the site which is visible on 1:25 K map. There is the opportunity to make this ditch more natural in morphology.
## 5 Placemaking - What sites should be considered for development? >> 5.7 Callander

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**Verbatim Comment:**
South Church Street Callander FK17 8BN

We would require a FRA for the site to assess the risk of flooding from the River Teith. The proposal may involve the change of use from commercial to residential and as such we would highlight that a FRA may only demonstrate that the site is not suitable for residential development.

All Callander Sites: Foul Drainage comments
Callander sewage treatment works is hydraulically overloaded. The opportunity to remove surface water from the combined sewer should be taken. The applicant should discuss connection to the public sewer with Scottish Water.
In August 2004, surface water from the crags and the golf course overwhelmed the drainage through Callander resulting in flooding of Bracklinn Road. In May 2009, flooding of Bracklinn Rd occurred at the railway culvert due to incapacity.

We would require a FRA to assess flood risk at this site. A small watercourse appears to be culverted to the north-east of the site however the route of the culvert is unknown. This should be investigated as part of the FRA and consideration should be given to PAN 69 which states that "buildings must not be constructed over an existing drain (including a field drain) that is to remain active". We recommend that appropriate mitigation measures are considered within the FRA to reduce the risk of surface water flooding.

All Callander Sites: Foul Drainage comments
Callander sewage treatment works is hydraulically overloaded. The opportunity to remove surface water from the combined sewer should be taken. The applicant should discuss connection to the public sewer with Scottish Water.
Claish Farm Mollands Road Callander Perthshire FK17 8JJ (Mir 37b)

We would require a FRA for the site to assess flood risk from the River Teith and the numerous small un-named watercourses within the site. We would highlight that large areas of the site may not be developable.

All Callander Sites: Foul Drainage comments
Callander sewage treatment works is hydraulically overloaded. The opportunity to remove surface water from the combined sewer should be taken. The applicant should discuss connection to the public sewer with Scottish Water.

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5 Placemaking - What sites should be considered for development? >> 5.7 Callander

Post flood survey undertaken in Callander after January 2005 and December 2006 floods. Includes aerial photographs. The culvert at Station Road car park has historically affected infrastructure and buildings in the vicinity. Stirling Council storm damage report 18 August 2004 reported that several houses on Tullipan Crescent and the roads were flooded as a result of water flowing from the crags and blocked culverts. 1 house was severely water damaged.

We would require a FRA for the site to assess flooding from the small un-named watercourse. Consideration should be given to upstream/downstream culverts and structures which may exacerbate flood risk. Mitigation options for surface water flooding should also be considered. Consideration should be given to PAN 69 which states that "buildings must not be constructed over an existing drain (including a field drain) that is to remain active".

All Callander Sites: Foul Drainage comments
Callander sewage treatment works is hydraulically overloaded. The opportunity to remove surface water from the combined sewer should be taken. The applicant should discuss connection to the public sewer with Scottish Water.
### 5 Placemaking - What sites should be considered for development? >> 5.7 Callander

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| (If applicable)      |       |
| Comment Reference:   | LDP01/MIR/CONS/00187/4/042 |
| Comment Method:      | EMAIL |
| Customer Type:       | Key Agency |

**Verbatim Comment:**

Churchfields Callander (site currently allocated in Local Plan as H12

Post flood survey undertaken in Callander after January 2005 and December 2006 floods. Includes aerial photographs.

A FRA has been undertaken for this site and developable areas have been agreed with SEPA. We would highlight that the full site will not be available for development.

All Callander Sites: Foul Drainage comments

Callander sewage treatment works is hydraulically overloaded. The opportunity to remove surface water from the combined sewer should be taken. The applicant should discuss connection to the public sewer with Scottish Water.
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.7 Callander

Customer Reference: 00187
Customer Name: Lagannoch, currently ED3 in (Adopted Local Plan)
Comment Reference: LDP01/MIR/CONS/00187/4/039
Comment Method: EMAIL
Customer Type: Key Agency
Organisation: SEPA

Post flood survey undertaken in Callander after January 2005 and December 2006 floods. Includes aerial photographs. Flooding issues have been recorded at Gullipen View to the north-east of the site and related to flooding of the Mellis Burn (photographic evidence taken 2004). A piped watercourse is known to be located within the site.

A small watercourse appears to be culverted adjacent to the existing council yard and the Mellis Burn also routes on the boundary of the site of the fire station. Part of the site is within the IRCFM flood boundary. We require a FRA to assess flood risk at the site from the small watercourse, the Mellis Burn and the River Teith. Consideration should be given to upstream/downstream culverts and structures which may exacerbate flood risk. Consideration should be given to PAN 69 which states that "buildings must not be constructed over an existing drain (including a field drain) that is to remain active". We would highlight that the provision of a FRA may only support that the site is not suitable for residential development.

All Callander Sites: Foul Drainage comments
Callander sewage treatment works is hydraulically overloaded. The opportunity to remove surface water from the combined sewer should be taken. The applicant should discuss connection to the public sewer with Scottish Water.

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**Verbatim Comment:**
Gart Caravan Park Stirling Road Callander FK17 8LE


The River Teith is located on the western boundary of the site with parts of the site at risk of fluvial flooding. As the proposal is for a change of use from a caravan park to residential, we require a FRA which assesses the risk of flooding to the site from the River Teith to ensure that built development is located outwith the functional floodplain. Most of the site is developable.

All Callander Sites: Foul Drainage comments
Callander sewage treatment works is hydraulically overloaded. The opportunity to remove surface water from the combined sewer should be taken. The applicant should discuss connection to the public sewer with Scottish Water.
Callander: It is noted that the MIR indicates that there are previously identified sites which remain undeveloped, however, there is a need to ensure there is a sufficient future supply of development land. The MIR identifies the A81/ A84 trunk road junction as having restricted capacity. The on-going discussions regarding the scope and content of the transport study to inform the Proposed LDP are welcomed and we look forward to continued dialog on this matter.

Callander's aspirations are stated to be the "outdoor capital of the National Park". This was discussed some time ago in Community Council and it was agreed that this is not the main aspiration of the Town. The aspiration should be described as "the primary settlement and destination of the National Park".
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.7 Callander

Customer Reference: 00088
Customer Name: Callander Community Council
Comment Reference: LDP01/MIR/CONS/00088/2/001
Verbatim Comment:
Yes, in Callander the support should be for small scale businesses including industrial and trades. Businesses need storage space, workshops and offices and there needs to be support for apprentices from the local area.

Organisation: Callander Community Council
Comment Method: OLDP
Customer Type: Local Public Body

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.7 Callander

Customer Reference: 00145
Customer Name: Scottish Water
Comment Reference: LDP01/MIR/CONS/00145/1/006
Verbatim Comment:
Page 94, Callander; there is currently limited capacity at our waste water treatment works (WWTW) and as outlined above, under ministerial direction, on receipt of the 5 growth criteria being met, Scottish Water will provide the additional capacity required at our WWTW. Again, as per previous comment, Scottish Water will be happy to participate or comment on any Masterplan framework.

Organisation: Scottish Water
Comment Method: EMAIL
Customer Type: Key Agency

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We were all in agreement with the following issues:

1. Growth to the South of the Town marked area (H37) for mixed use and Option 1.

We all concurred that Callander needs to grow. The school has expanded in the last 4 years with Nursery places full and classes increased from nine to ten, with overcrowding in many of the small classrooms, and for the need to keep Callander’s retail center vibrant from increased use by local residents. From all the areas that land owners are prepared to sell we agreed with the Parks proposal that the land to the south was the most favoured area for housing and mixed use, but that the infrastructure required to support this, roads and a bridge across the River Teith for access from the north to the south should be in place first or at the same time. There needs to be a cohesive plan for vehicle and pedestrian movement in and around Callander to enable development and growth.

We queried why development costs alone should fund this and believed there should be government input to make this happen if the required number of houses a year to sustain growth were to be met. The Park anticipates that Callander needs 75 homes a year. The primary school is already at capacity and recent growth in the primary school role has put the premises under pressure. Current pupil level is 230, although the Council has set capacity at 290, which no one involved in the primary school believes is practical. The high school is different, the school role at between 600-650 has not changed much in recent years (dropped if anything) but the remodelling and extension carried out in the PPP contract, only about 6 years ago, have given the buildings a capacity for over 900 pupils. However for many years the school has been considerably short of its statutory requirement for open playing fields and this need could well support the case for more nearby open space for a showground, etc.
5 Placemaking - What sites should be considered for development? >> 5.7 Callander

St Kessogs future needs to be decided. If there is no developer prepared to take on the building, a plan and funds need to be agreed between the community, National Park and Stirling Council to secure and develop the building for community use and to implement a theme for St Kessogs to act as an attraction for visitors.

The new development to the south should not provide facilities that are already provided or could be supplied in the High Street. This location would give the closest access to the town's facilities, and schools, in addition to the development of the indicated infill areas within the town in Option 1. However we do not agree with building on the Station Road car park for the reasons given below.

2. Station Road and Meadows Car Parks

Currently Callander has two main attractions for visitors within the town, the Meadows with the river and children's play area and the retail experience in the High Street. As well as improving the High Street we feel the Meadows is currently underused because of water logging, flooding of the playground, the untidy state of the back of the shops facing onto the river and most of the Meadows are a car park. Our vision as per the Charrette would be to change its use, by reverting the majority of it back to Meadows, creating an improved natural environment, with increased use for visitors and locals with a car free zone (disabled apart), an improved play park for children, an outdoor multi gym, a skate park and cafes which extend into the Meadows from the back of the High Street shops etc. to entice locals and tourists to stay longer rather than passing through. "We go to Callander because we all love the Meadows and the shops." Incentives should be introduced to encourage retailers to open in the vacant shops in Callander. The high rateable value of shops, pubs, restaurants should be addressed and reset to a realistic level. The streetscape was to be improved under the Charrette more effort is needed to improve the visual appearance of the town.

In order to achieve this car parking would have to be in the Station Road car park, the only current space that is big enough and near enough to the Meadows and the shops to be practical and take the volume of traffic. Although many say this is currently underused, it is probably because they do not have to use it with the Meadows being so better signposted and too big. The Station Road car park is also the only space big enough for Coaches which Callander relies on for its tourist trade and for lorry parking. Stirling Council, a few years back, reviewed the parking requirements within Callander, as part of a plan to redevelop the Station Road car park, there were concerns re traffic flow from the south getting to the Station Road car park and their work should be reviewed to extract traffic flow and signage ideas for good traffic management. Increased use of the Station Road car park should include better facilities for walkers and bikers extending the toilet facilities to provide showers and secure...
lock ups for bikes, biker helmets and walkers backpacks. Signage to the car park, within the car park and from the car park needs improvement and standardisation. The National Park Authority should use Callander as the template for signage throughout the National Park. This needs to cover signage for parking, signage throughout the town and to access all the walks and countryside around Callander. Many walks are still blocked e.g. the Crags walks and for the signage to be effective these need to be opened up.

We would therefore not agree with any development on the Station Road car park site except for an improvement in its current use and would like to see the car park in the Meadows taken away for leisure use and improved water logging and flood protection.

Although the Park statistics show the Park has an aging population Callander has seen families moving to the area with the current nursery facility being full and having to limit date of uptake. This would indicate the need for a mixed use of homes, of differing value. The board are aware that the rural housing has a long list for those requiring affordable housing in the area. Provision of new smaller houses to allow older residents to down size will also free up their existing larger homes. It was queried whether the area with planning permission for a supermarket should revert back to housing or it could be given a joint designation for both. This may encourage the supermarket development to progress, however as the land was previously designated for a large number of years for housing this may not have any effect. To support the growth in housing nursery and primary school capacity and facilities need to be addressed. To meet the housing targets developers need to be encouraged by incentives in the National Park and Stirling Council to take on the provision of the diverse housing mix Callander requires.
Provision of a new hotel has long been planned to the east of the town and this would suit a spa, conference or golf (perhaps incorporating the golf course) style hotel. A hotel to the south of town should not be to the detriment of the Leisure Centre facilities, so if a hotel is to be planned, it should be themed to support the outdoor activity aspirations of Callander. A hotel to cater for the needs of families, who are bikers, walkers, kyakers, etc. and to offer leadership and team building events with suitable facilities, such as drying rooms and secure lock ups for bikes. The National Park and Stirling Council need to implement a scheme to encourage hotel developers for both sites, there has been little or no effort so far to market a new hotel in the Callander area. Are both sites still designated for a hotel?
For the following sites that are carried forward from the ALP, we recommend early engagement with HS on development proposals which may raise complex or significant issues for the assets listed below. This will be key to avoiding adverse impacts including respecting the site and setting and character of assets and optimising positive outcomes for the historic environment:

Callander - H12 Preferred existing site (The Roman Camp GDL)

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Environment developer site requirements and comments: Keltie Water forms S boundary of site and large pond is within N area of site. Buffer strips needed for these areas of water. Public sewer is 500m from site - consider requiring a foul sewer connection here. - see comments on Auchenlaich.
5 Placemaking - What sites should be considered for development? >> 5.7 Callander

Customer Reference: 00189
Customer Name: [Redacted]
Comment Reference: LDP01/MIR/CONS/00189/1/001
Comment Method: EMAIL
Customer Type: Private Business

Verbatim Comment:
CWP Property & Investment supports the proposed change for site H10 from residential use identified in the current local plan to retail use. This proposal is identified in both the preferred option 1 and also alternative option 2.

CWP Property & Investment submitted a planning application in 2011 for the development of a supermarket on this site which planning committee was minded to approve on 2nd April 2012 subject to the signing of a S75 agreement. Although the S75 has not yet been completed it is at an advanced stage and is anticipated to be completed shortly. CWP confirm that they have every intention of implementing this proposal once planning permission has been granted.

The development of a supermarket on this site will provide a significant enhancement of retail facilities within Callander and will reduce the need to travel to Stirling and other towns for grocery and related shopping requirements. It will also provide important local employment opportunities within Callander and the National Park.
Callander is an important gateway and tourism centre to the park and as such the town centre must be sustained. Efforts are needed to ensure that new housing is not allowed merely to generate more commuting to the central belt but preferably linked to new economic activity. Expansion must only be permitted if environmental impacts can be managed satisfactorily bearing in mind flood risks etc.
In relation to Callander, the MIR preferred and alternative proposals are somewhat confusing which makes it difficult to comment on their relative merits. For example, the alternative site River Teith MIR37b, if it is to be considered for the short term (2016-2021), should give an indication of the amount of potential development that could come forward here. Reference is made on page 90 of the MIR to the outcome of the Charrette and an aspiration for development in phases south of the river, and then MIR37b is put forward as an alternative (addition) to MIR37a but no explanation is provided in the MIR as to why development on this scale is required for Callander over the period to 2021. Of concern also is the longer term development (housing?) opportunity south of MIR37a, and the overall impact major development in Callander may have on high school capacity etc.

Callander Question 1: Do you agree with the preferred options, or would you support the alternative? Why?

We agree with the option 1 which is generally what has being the plan since the charrette. Option 3 should also be added as the longer term strategy.
### Callander Question 1: Do you agree with the preferred options, or would you support the alternative? Why?

**Customer Reference:** 00093  
**Customer Name:**  
**Comment Reference:** LDP01/MIR/CONS/00093/1/016  
**Comment Method:** OLDP  
**Customer Type:** Public Body  
**Organisation:** Scottish Natural Heritage

**Verbatim Comment:**
Yes, we agree with the preferred option.

The alternative allocation at 37b would not be in line with the findings of the Calendar Charette. The Masterplan on page 41 of the Callander Charette Report proposes a ‘key pedestrian path’ (footbridge) in the vicinity of where the new road bridge is proposed in 37b and a ‘riverside park’ where 37b suggests a road adjacent to the south bank of the river should be. Development in 37b would therefore compromise the vision for Callander as a growing settlement, but one that retains and maximises the benefits and opportunities from greenspace around the river.

For some reason, there is no narrative in the Environmental Report (Appendix 7) against this site. It would be helpful to explain the ‘scores’ against the different SEA objectives as a context for any further decisions/debates regarding this alternative. (Note: Assume comment relates to incorrect Appendix 7. Appendix E and F of Strategic Environmental Assessment Draft Environmental Report can be found within the downloads section of www.ourlivepark.com)
Customer Reference: 00174
Customer Name: Rob Latimer
Comment Reference: LDP01/MIR/CONS/00174/1/011
Comment Method: OLDP
Customer Type: Individual Resident

Callander Question 1: Do you agree with the preferred options, or would you support the alternative? Why?

A change of use for Station Road car park would require serious consideration in terms of the continued provision of parking. This could be particularly important if Callander is to achieve its potential as a visitor and outdoor hub.

I would support long term options to the south but that may be beyond the timescale of this revision and so for now generally support the preferred option.

Land immediately south of the Teith should not be developed, should rather be retained as open space, potentially park land and with improved non motorised access. In order to engage with the river side setting we need an eastern bridge and improved path network. A vehicle bridge can wait until the later stage of southern development as noted above.
5 Placemaking - What sites should be considered for development? >> 5.7 Callander >> 5.7.1

Callander Question 1: Do you agree with the preferred options, or would you support the alternative? Why?

Customer Reference: 00175
Customer Name: Mr And Mrs Gray
Comment Reference: LDP01/MIR/CONS/00175/1/002
Comment Method: EMAIL
Customer Type: Individual Resident

Verbatim Comment:
MIR 37b - Claish East
MIR 37b provides an opportunity for the masterplanned longer term expansion of Callander. The long term expansion of Callander to the south is in accord with the outcome of the Callander Charrette, which identified this area as a sustainable location for growth. This is in accord with SPP (paragraph 50), and Policy RD13 of the National Park Partnership Plan 2012-2017.

As part of the landowner’s ongoing promotion of their landholdings, there is further developer and house builder interest in this site.

The site is being looked at by agencies within Scottish Government in respect of its tourism potential. Scottish Development International (SDI) has visited the site. The proposal includes the provision of a family hotel, strengthening the tourism accommodation in Callander. The proposal includes an opportunity to expand playing field provision at the McLaren High School to meet future needs. The provision of riverside park is also an important part of the proposal, providing an opportunity to enhance the river edge as a natural asset and improve the biodiversity of the site. This also allows great public access to the riverside. There needs to be ongoing flexibility about the future disposition of land uses within MIR 37b but the land uses proposed for inclusion in the LDP are acceptable.

The Landscape Capacity Assessment confirms that there is capacity to accommodate this site (MIR 37b). The proposal for MIR 37b takes account of the requirements of the Landscape Capacity Assessment by avoiding a continuous built edge, providing open space throughout, and providing a substantive greenspace edge to the River Teith.

The Landscape Capacity Assessment confirms that the existing arrival into Callander from the south is weak. The allocation of sites MIR 37a and MIR 37b provides an opportunity to provide an enhanced gateway to Callander.

Proposed Overall Allocation
The landowner is committed to a masterplanned approach to the development of sites MIR 37a and MIR 37b, working in a partnership approach with the NPA. This approach will ensure that appropriate mitigation measures are identified and adopted with a development programme ensuring the timely delivery of infrastructure.

SPP requires that ... local development plans should allocate appropriate sites to support the creation of sustainable mixed communities and successful places and help to ensure the continued delivery of new housing (paragraph 122).

Together, sites MIR 37a and MIR 37b deliver homes, support tourism development and provide jobs in the long term. This is in accord with SPP (paragraph 122).
Main Issues Report Our Live Park Comments Received

The proposal promotes the cohesive, sustainable, long term economic growth of Callander, in accord with SPP, (paragraph 15), and Policies RD1, RD2, RD3, RD7 of the National Park Partnership Plan 2012-2017.
There will be no built development within any identified flood risk areas.
There is developer interest in developing this site. The proposal is effective in accord with the tests set out in PAN2/2010 (see table below).

PAN 2/2010 Test Compliance
Ownership - Site is owned by a party willing to release for development. Developer interest in the site.
Physical - Site free from physical constraints - no development to take place in flood risk area. Contamination - Previous use of land unlikely to have resulted in any contamination.
Deficit Funding - No public funding necessary for development to proceed
Marketability - The site is marketable, strong demand for new homes in Callander. Already, circa 70 homes are identified to be developed within Plan period. Other uses will follow in due course.
Infrastructure - No significant infrastructure requirements for first phase. Development of later phases can deliver education and transport infrastructure as required following more detailed impact assessments.
Land Use - Housing and tourism development are the key components of the proposed development.

Recommendation
The NPA's Preferred Option for Callander is not supported. For the reasons set out above, Option 1b provides the optimum solution for the necessary identification of additional housing land, tourism destination, and the planned delivery of infrastructure. Option 1b is in accord with SPP and policies within the National Park Partnership Plan 2012-2017
The site boundary of MIR 37a (Claish West) should be amended to increase the allocation by a further 2.1 hectares to reflect the developer interest in delivering an effective site as shown in Dwg.12027-ST-P008.
The proposed allocations (Claish East and West) will deliver the key infrastructure required for the long term growth of Callander. It is logical that the long term strategy continues to focus on the area south of MIR 37a and MIR 37b, supporting NPA’s Preferred Long Term strategy. This is also in accord with SPP.
5 Placemaking - What sites should be considered for development? >> 5.7 Callander >> 5.7.1

Callander Question 1: Do you agree with the preferred options, or would you support the alternative? Why?

Customer Reference: 00186
Customer Name: Historic Scotland
Comment Reference: LDP01/MIR/CONS/00186/1/008
Comment Method: EMAIL
Customer Type: Public Body

Verbatim Comment:
Option 3 Longer term strategy

We note that this option for a longer term development to the south of Callander being proposed is dependent on a new road bridge. The development area is part of a previous call for sites and design concept consultation we responded to in 2013. We note that the option is centred on a number of scheduled monuments located within this site and we consider that it should not be proposed as a development area in the future. If this longer term strategy were to be taken in to the Proposed Plan we would be likely to raise this as an unresolved issue.
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<td>Verbatim Comment:</td>
<td>SPP requires the LDP to give an indication of the possible scale and location of housing land up to year 20, but it is not clear how these major proposals for Callander relate to the targets for affordable and market housing put forward in the MIR. For example, there is no table setting out the total level of housing to be apportioned to each settlement once the effect of the proposed alternatives (higher levels of growth) set out in the MIR itself are included. Tables 8 and 9 of the Population and Housing Background Report only deal with the Preferred Approach (75 units per annum) and lower levels of growth.</td>
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<td>Comment Reference:</td>
<td>LDP01/MIR/CONS/00213/1/015</td>
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<td>Verbatim Comment:</td>
<td>Development to the south of the River Teith will in the first instance be determined by the capacity of the A84 / A81 junction. Significant development to the south of the river is likely to require a solution such as an additional road bridge. Hence if significant development is a realistic aspiration, and an additional road river crossing is required to enable it, then an alignment for such may need to be protected. It may also be worth considering whether the permeability of the town for pedestrians and cyclists (and hence the distances that need to be travelled to access local services, which in turn affects the choice of mode for such) may be improved by an additional footbridge.</td>
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5 Placemaking - What sites should be considered for development? >> 5.7 Callander >> 5.7.1

Callander Question 1: Do you agree with the preferred options, or would you support the alternative? Why?

Verbatim Comment:
We note that the Old Post Office site is progressing through the planning process. Future development at Churchfields and Pearl Street remains uncertain however. Callander should be the focus of larger scale development and we agree with the proposed MIR 37a site on the south side for up to 60 homes, and for a longer term strategy of further growth beyond this site.
5 Placemaking - What sites should be considered for development? >> 5.7 Callander >> 5.7.1

**Callander Question 1:** Do you agree with the preferred options, or would you support the alternative? Why?

In 2010 we had put forward representations to the finalised local plan for the Stirling Road site, currently identified as H10 within the plan, as being suitable site for convenience retail use. We were therefore pleased to see that planning permission was subsequently granted by the National Park Planning for retail use on that site. We therefore support the preferred option of changing H10 to retail use.
5 Placemaking - What sites should be considered for development? >> 5.7 Callander >> 5.7.1

Callander Question 1: Do you agree with the preferred options, or would you support the alternative? Why?

Customer Reference: 00186
Customer Name: Historic Scotland
Comment Reference: LDP01/MIR/CONS/00186/1/007
Comment Method: EMAIL
Customer Type: Public Body

Verbatim Comment:

MIR37a New Preferred Option & MIR37b New Alternative Option, Claish Farm

As noted above we previously returned comments as part of a call for sites exercise and also a design concept consultation in 2013. This consultation was based on a larger development area, and in our response we raised concerns that should the site become a preferred allocation, it must be demonstrated that any activities undertaken within it would not have an impact on the following four scheduled monuments located within in the south-eastern part of the development area:

SM 6968 Claish Farm, palisaded enclosures and timber hall
SM 6966 The Clash, palisaded enclosure
SM 6967 The Clash, enclosure
SM 6972 Lots of Callander, palisaded enclosures

We also recommended that the four monuments be excluded entirely from the allocation in order to protect them and their setting.

MIR37b

The Roman Camp GDL is also within the vicinity this allocation. In terms of potential setting impacts on the Roman Camp GDL the application of national and appropriate local development plan policies should ensure any adverse impacts are mitigated.
Callander Question 1: Do you agree with the preferred options, or would you support the alternative? Why?

Verbatim Comment:
For the following sites that are carried forward from the ALP, we recommend early engagement with HS on development proposals which may raise complex or significant issues for the assets listed below. This will be key to avoiding adverse impacts including respecting the site and setting and character of assets and optimising positive outcomes for the historic environment:

MIR 39/ (ED3) Alternative existing site (The Roman Camp GDL)

Callander Question 1: Do you agree with the preferred options, or would you support the alternative? Why?

Verbatim Comment:
With reference to considering the development of station car park. As the MIR states, development could only be brought forward if a car parking review concluded how much car and coach parking needs to be provided at this site, and if it is not to be provided at this site, where it might be provided. Hence subject to the scale of development desired at the station car park, the LDP may need to consider locations for alternative parking elsewhere in Callander.
A Master plan is mentioned in the report's other comments. We think it is essential to progress this as soon as possible because there are many developments planned for the area south of the river and we need to get their possible locations discussed and decided.

The Master Plan should include all of the land south of the river as far as the road junction to Cock Hill and Doune and also land on the north side where links are to be made e.g. a new bridge and access to the A84.

There is mention of a new hotel in this area, a site for this should be decided as well as the type of hotel and the benefits to Callander. This will enable us to approach hotel chains for possible interest.
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<th>5 Placemaking - What sites should be considered for development? &gt;&gt; 5.7 Callander &gt;&gt; 5.7.2</th>
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<tr>
<td>Callander Question 2:</td>
<td>Are there other options you think should be supported? Why?</td>
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<td>Customer Reference:</td>
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<td>Comment Method:</td>
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<td>Customer Type:</td>
<td>Public Body</td>
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Verbatim Comment:
It is not clear to us why there are no potential options for a road crossing further south of the current settlement as envisaged in the Masterplan of Callander on page 41 of the Callander Charette Report.
We do not support the proposed reduction of site MIR39 and ED3 to follow the boundary of the existing developed area as suggested in Option 1 and Option 2. This site is currently being promoted as industrial land (ED3 - Lagrannoch within the Local Plan). However it is evident that the historical take up of Class 4/5 land within the town is so low that this large site is likely to remain vacant and undeveloped for many years to come.

As part of a more proactive approach we consider that site MIR39 & ED3 should be redefined as part of an area of mixed use (housing, business and community use). As part of the mix of uses, an area for housing could be retained adjacent to the existing housing in order to compensate (at least in part) for the proposed change on the H10 site from residential to retail use. In addition Drummond Estates continue to be aware of the high demand for allotments within the town which could also be accommodated on part of the site and possibly form a green buffer between the housing and any remaining economic development parts of the site.

An allocation such as a Mixed Use Opportunity Site would be more appropriate and allow the opportunity for further consultation to be undertaken on the nature and extent of preferred land uses (housing/business/community use). In particular we also note from the Infrastructure and Services Chapter of the MIR that mixed use developments can help subsidise investment in lower value land uses. Given the sites location within Callander and its proximity to existing services such as the medical centre and open space as well as being within walking distance of the proposed supermarket site, a mix of land uses would offer greater benefit as a whole and meet with general principles of sustainable development as set out in Scottish Planning Policy.

We also oppose the longer term option 3 of safeguarding a potential access route through site MIR 39 & ED3 with the provision of a new road bridge over the River Teit.
Callander Question 2: Are there other options you think should be supported? Why?

We support the "Preferred Option" for Callander, specifically MIR 36 for Station Road Development Site.

In line with the current Local Plan an opportunity exists to develop Station Road Car Park for retail (including convenience retail), food and drink, tourism, housing and associated uses whilst improving car parking provision. It is the only large area of land in central Callander that could accommodate new retail/tourism development and at the same time reposition and improve the role of the town centre including existing local facilities and quality of retail offer to increase dwell time and expenditure from visitors. It has the potential to attract retailers not already represented in the town and also provide space for existing businesses to expand and free up other units in the town centre for new companies. Overall it would encourage a wide pedestrian flow and strengthen the retail core.

The site is currently used as a public car park with public conveniences. It has the potential however, in conjunction with the nearby Meadows car park, to be used more efficiently. By drawing pedestrians and interest to Station Road, this would extend and integrate this part of Callander into the core area ensuring the car parks are not considered remote as is happening at present. It is understood maintaining current parking capacity is important as is traffic management and re-provision of the public conveniences. The development opportunity at Station Road opens up the possibility of linking the car parking provision with the Meadows car park through traffic management initiatives.

Development of this situe will bring economic benefits which will support the current economy and community. It will bring both short and long term employment opportunities to Callander, helping to retain and grow the working population in the town as well as bringing additional expenditure to existing town centre businesses.

The following comment relates to the Site Assessment Summary within the above report:-

We support the officer recommendation in relation to Station Road Car Park for reasons stated in the Main Issues Report comments page above.
Main Issues Report Our Live Park Comments Received

Customer Reference: 00142
Customer Name: R MacKellar
Comment Reference: LDP01/MIR/CONS/00142/1/001
Comment Method: EMAIL

Verbatim Comment:
Please find attached representations to the Main Issues Report consultation on behalf of our client in relation to land at Callander (Sites MIR 31 and 32).

Please see Appendix 1 for further information

Customer Reference: 00088
Customer Name: Callander Community Council
Comment Reference: LDP01/MIR/CONS/00088/5/004
Comment Method: OLDL

Verbatim Comment:
We would like to see the inclusion of a new major attraction in the Town, this was discussed and agreed at the charrette. We propose including a site for an information centre with restaurant on top of Callander Crags with a racked railway from the car park at the top of North Church Street, through the gap sites and through the woods to the top of the Crags.
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.7 Callander >> 5.7.3

Callander Question 3: Any additional comments or options?

Verbatim Comment:
Whilst we agree with MIR 37a as a preferred site, it does pose particular landscape sensitivities and will require careful master planning as a key gateway to the settlement from the south. We believe this should be reflected in any development brief irrespective of any longer term development opportunities to the south of MIR37a.

Customer Reference: 00093
Customer Name: Scottish Natural Heritage
Comment Reference: LDP01/MIR/CONS/00093/1/018
Verbatim Comment:

Verbatim Comment:
Currently I am aware of work by McLaren Leisure Centre and the Callander Mountain Bike Trails project which seeks to enhance the path network around Callander, build on the aims of the Charette and working with the Community Sport Hub initiative benefit both visitors and residents. Callander can become the outdoor capital and a far better gateway to the Park with the support of LLTPN.

Customer Reference: 00174
Customer Name: Rob Latimer
Comment Reference: LDP01/MIR/CONS/00174/1/012
Verbatim Comment:

If you feel any information in this report is incorrect please contact us by email at hello@ourlivelpark.com
Given the (housing and tourism) aspirations for Callander, the Council repeats the statements it made in relation to the National Park Local Plan, i.e. that it is requested that the National Park Authority, Transport Scotland and Stirling Council identify package of transport measures to address the travel demands of development on the town and the A84 trunk road. Where this package of measures can help address the travel demands contributed to by the development, developer contributions could be sought.
A number of sites included in the Placemaking section of the MIR concern us as they either contain or are adjacent to ancient woodland and others contain, or are in proximity to, other woodland/wooded sites. These are listed in the attached table with reasons for our concern.

We OBJECT to the following sites being identified for further development since this will lead to the loss of ancient woodland and damage to ancient woodland.

We consider that these site allocations should not be taken forward unless the protection of the adjacent woodland can be guaranteed and therefore request that where the allocations are taken forward, sufficient buffering between the proposed development and woodland should be identified in planning policy at the appropriate stage.

We recommend that if any protected species are present on the development site or adjacent to the development site that the appropriate survey work is carried out to determine the impacts that the development may have on the populations.

ST9  Ancient woodland (Drum Dhu Wood) adjacent to site.

Please see Appendix 6 for further information
A number of sites included in the Placemaking section of the MIR concern us as they either contain or are adjacent to ancient woodland and others contain, or are in proximity to, other woodland/wooded sites. These are listed in the attached table with reasons for our concern.

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We recommend that if any protected species are present on the development site or adjacent to the development site that the appropriate survey work is carried out to determine the impacts that the development may have on the populations.

H12 Ancient woodland adjacent to site.

Please see Appendix 6 for further information
A number of sites included in the Placemaking section of the MIR concern us as they either contain or are adjacent to ancient woodland and others contain, or are in proximity to, other woodland/wooded sites. These are listed in the attached table with reasons for our concern.

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We recommend that if any protected species are present on the development site or adjacent to the development site that the appropriate survey work is carried out to determine the impacts that the development may have on the populations.

RA1 - Ancient woodland (Drum Dhu Wood) adjacent to site.

Please see Appendix 6 for further information.
5 Placemaking - What sites should be considered for development? >> 5.8 Carrick Castle

Customer Reference: 00209
Customer Name: [Redacted]
Comment Reference: LDP01/MIR/CONS/00209/1/011
Organisation: Scottish Campaign for National Parks
Comment Method: EMAIL
Customer Type: Other

Verbatim Comment:
Preferred Option is satisfactory.
A number of sites included in the Placemaking section of the MIR concern us as they either contain or are adjacent to ancient woodland and others contain, or are in proximity to, other woodland/wooded sites. These are listed in the attached table with reasons for our concern.

We OBJECT to the following sites being identified for further development since this will lead to the loss of ancient woodland and damage to ancient woodland.

We consider that these site allocations should not be taken forward unless the protection of the adjacent woodland can be guaranteed and therefore request that where the allocations are taken forward, sufficient buffering between the proposed development and woodland should be identified in planning policy at the appropriate stage.

We recommend that if any protected species are present on the development site or adjacent to the development site that the appropriate survey work is carried out to determine the impacts that the development may have on the populations.

H14 Carrick Castle - Ancient woodland adjacent to the site.

Please see Appendix 6 for further information.
Customer Reference: 00187
Customer Name: Willowbrae Crianlarich FK20 8RR (M52)

Comment Reference: LDP01/MIR/CONS/00187/4/037
Comment Method: EMAIL
Organisation: SEPA
Customer Type: Key Agency

Verbatim Comment:
Willowbrae Crianlarich FK20 8RR (M52)

We require a FRA to assess the risk of flooding from the small un-named watercourse. Consideration should be given to upstream/downstream culverts and structures which may exacerbate flood risk.
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<td>Key Agency</td>
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Verbatim Comment:
Lower Station Road / Meadow Grove Crianlarich FK20 8EU

Frequent flooding reported to impact on the nearby Village Hall.

We would require a FRA for the site in order to assess the risk of flooding from the River Fillan and the Station Burn. Consideration should be given to upstream/downstream culverts and structures which may exacerbate flood risk. We would highlight that the provision of a FRA may only support that this site is not suitable for further development.

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<td>Verbatim Comment:</td>
<td>It is recommended that guidance be sought from the Stirling and Tayside Timber Transfer group as to whether land for a timber transfer facility be protected in Crianlarich</td>
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</table>
5 Placemaking - What sites should be considered for development? >> 5.9 Crianlarich

Verbatim Comment:
The MIR indicates an aspiration to identify further development land to be made available resulting from the Crianlarich by-pass. It should be made clear in the Plan that developments in the area will require to take access from the local roads and we should be included in early consultations regarding the scope of assessments.

Crianlarich Question 1: Do you agree with the preferred option? Why?

Verbatim Comment:
We agree with the proposed site at Willowbrae for 6 homes.
We suggest that there are opportunities to create off road links to the economic development site from the settlement.

ST11 is not in the village so basically creates a new village?? As we lack basic served like buses, decent pavements, no amenities or shops, sewage systems and served by poor broadband from Drymen exchange. expansion doesn't make sense outside the village boundaries.
Preferred site make sense especially H15 as there is a road already in place from Buchanan Crescent and it is in the heart of the village.

As there are an existing House next to Catter Burn next H15 area which has not suffered from flooding issue 2 is not a problem??
Main Issues Report Our Live Park Comments Received

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<th>Chapter Commented on:</th>
<th>5 Placemaking - What sites should be considered for development? &gt;&gt; 5.10 Croftamie</th>
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Verbatim Comment:
Q2 Why is it just these areas, the field across from the Nursery school is as good an option as LHR 2 or the opposite side of the road of H15?

If you feel any information in this report is incorrect please contact us by email at hello@ourlivempark.com
We note that page 100 of the current Main Issues Report (Croftamie: issues) states that "no main sewer - may constrain additional development" and we feel that further contextual clarification surrounding this statement is required. Scottish Water does not consider the current lack of public sewerage infrastructure or limited treatment capacity at the receiving treatment works to be a matter which precludes further development being promoted within a local development plan. Indeed, the inclusion of such sites in areas which may require investment is an essential requirement for us being able to initiate an investment programme and allocate growth funding.

As such insufficient capacity should not be seen as a barrier to development.

With specific regards to the lack of public sewerage network, the site H5 is situated on top of the local sewer network which drains to Croftamie wwtw and directly adjacent to the works itself. It would be essential therefore that measures be taken by any developer to ensure the sewer network was protected during such ground works.

Site H12 is directly adjacent to the start of the existing sewer network and if an extension to this network was required to allow any development to be delivered, this would be at the developers own cost, with Scottish Water making a financial contribution to this via the reasonable cost contribution (rcc) funding mechanism.

Site ST11 is at some distance from the settlement itself and therefore it is assumed that an extension to the adjacent public sewer in Croftamie would be problematic, insofar as ensuring legal agreement for the routing of any new sewer pipework through adjacent landowners property. Similarly the cost of providing such an extension may prove to be prohibitive. Therefore consideration of a private treatment solution for any leisure and or housing accommodation would be the most practicable solution.

Moreover, given the size of development proposed, it may be required that further investigation is needed and water and/or drainage impact assessments will need to be completed to assess the local infrastructure and ensure no detrimental impact to existing Scottish Water customers.
5 Placemaking - What sites should be considered for development? >> 5.10 Croftamie

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**Verbatim Comment:**
Pirniehall Croftamie Glasgow (local plan site ST11)

A minor watercourse runs along the edge of this site, this poses a potential risk of flooding. A basic FRA will be required either prior to, or in conjunction with any planning application. This will need to define the areas at risk of flooding, the relative vulnerability of the proposed use and confirm design layout and levels. We would be likely to object to the development of this site unless appropriate additional information is submitted / the site plan is amended to remove the sections thought to be at risk.
5 Placemaking - What sites should be considered for development? >> 5.10 Croftamie

Customer Reference: 00187
Customer Name: Organisation: SEPA
(If applicable)
Comment Reference: LDP01/MIR/CONS/00187/4/035 Comment Method: EMAIL
Comment Method: EMAIL
Customer Type: Key Agency

Verbatim Comment:
Main Street (local plan site LH2)

We would require a FRA for the site in order to assess the risk of flooding from the Catter Burn and potential developable area.

Foul Drainage: The Scottish Water septic tank has no spare capacity. This is therefore a constrained site. We would not want a private system so request discussions between developer and Scottish Water. Potential for impact on the Catter Burn due to location of development: morphology and point source impacts.

SCNP is not supportive of additional housing in what has become potential commuter country. Similarly, the concept of enabling residential development on site ST11 has not been justified and is open abuse which would be extremely difficult if not impossible to control.
In considering the MIR, the Stirling Council Planning Service has focussed on the settlements in close proximity to the planning authority boundary which are most likely to have impacts on the area. In terms of settlement specific proposals for Aberfoyle, Croftamie, Drymen and Killin we have no particular concerns, provided infrastructure constraints required for development are addressed.

We feel that further consideration should continue to be given to providing more affordable housing here and are in the process of exploring local housing needs and possible site opportunities.
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.10 Croftamie

Customer Reference: 00187
Customer Name:
Comment Reference: LDP01/MIR/CONS/00187/4/034
Comment Method: EMAIL
Organisation: SEPA
Customer Type: Key Agency

Verbatim Comment:
Buchanan Crescent (local plan site H15)

We would require a FRA for the site in order to assess the risk of flooding from the Catter Burn and potential developable area.

Foul Drainage: The Scottish Water septic tank has no spare capacity. This is therefore a constrained site. We would not want a private system so request discussions between developer and Scottish Water. Potential for impact on the Catter Burn due to location of development: morphology and point source impacts.

Water Environment: Buffer strip required, there may be restoration opportunities.
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.10 Croftamie >> 5.10.1

Croftamie Question 1: Do you agree with the preferred option above? Why?

Customer Reference: 00218
Customer Name: (If applicable) Rural Stirling Housing Association
Comment Reference: LDP01/MIR/CONS/00218/1/012
Comment Method: EMAIL
Customer Type: Individual Resident

Verbatim Comment:
We agree with the proposals to retain the existing site and to provide for a further site.
5 Placemaking - What sites should be considered for development? >> 5.11 Drymen

Customer Reference: 00079
Customer Name: Stuart Philpot
Comment Reference: LDP01/MIR/CONS/00079/1/001
Comment Method: EMAIL
Customer Type: Individual Resident

Verbatim Comment:
I am against this proposed development of 16 houses (MIR62) in Drymen for the following reasons:

The Stirling Road site still has planning permission for another 3 years - so Drymen could end up with 2 major new developments.

Local resources such as doctors and schools will be overstretched.

More housing means more people which means more cars adding to the traffic in and out of the village.

The green entrance to the village is very important to the locals and the many thousands of visitors to the National Park - building on the proposed site would lead to an urban view of a modern housing development.

A highly populated development on the proposed site is inappropriate.
In reference to the proposed development plans within Drymen please find comments herein:

Firstly the below issues are acknowledged in the main issues report:

1. Potential limitations in capacity of primary school due to new housing in the school’s wider catchment
2. Limited car parking at peak tourist season
3. Need for improved traffic/on street car parking management
4. Safeguard village character and improve public realm

There are several factors which are of grave concern with respect not only to the village of Drymen as a whole but more specifically the plans (MIR62) affecting the south main street of the village. The plans seem highly emphatic on fulfilling housing quotas, building housing to the detriment of the many factors important to the residents and visiting tourists, focusing on quantity not quality. This seems contrary to the “National parks underpinning principles to conserve and enhance the natural and cultural heritage of the area”. Drymen is regarded as an important gateway to east Loch Lomond, the historical, characterful and environmental qualities are what make this a desirable and pleasant location to not only live but to visit as a tourist.

Heritage and Village Character

The village has many listed buildings, steeped in history, nestling sympathetically within the landscape with access to an extensive vista towards both mountains, the loch and the nearby agricultural landscape. It has been noted in the previous report* "...open sites to the village fringes are identified as being more important to the wider setting, particularly to lower east, where new housing should be constrained if the local character and village identity is to be safeguarded" . The surrounding green spaces are an essential ingredient to the identity and pleasantness of the village. Current suggestions such as MIR62 have a strong focus on high density housing with very little consideration for the impact on current amenities such as roads, parking, sporting, leisure and park facilities and more importantly those which are already at capacity or undergoing a reduced service such as the Health centre amenity, Drymen Primary school and neighbouring private and council run nursery provision. Serious consideration
Main Issues Report Our Live Park Comments Received

to alternatives which consider delivering improved amenities rather than placing further pressure through extra housing should be considered (some suggestions are listed below). With respect specifically to MIR62, where 16 housing units have been proposed on a gap site. The consultants from the 2009 report suggest* "The south entrance of the village is of heritage significance" being low density, predominantly detached homes set within attractively set plots with natural surroundings. The historically listed buildings such as the church and stone old factors house fringe this site, imparting an important architectural contribution to the main thoroughfare to the village. Any significant development would not be in-keeping with the density and character of this portion of the village, adversely affecting the setting of these listed buildings and appearance of the conservation area. This proposal will have an adverse effect on the residential amenity of neighbours, by reason of adding significantly to the noise, disturbance, overlooking, loss of privacy and overshadowing.

The proposal pursues a particularly high density of housing, aggressively overdeveloping a sensitive portion of the village especially as it involves loss of the open aspect of the neighbourhood. The south entry to Drymen is a major thoroughfare for walkers, cyclists and tourists. The development’s visual impact to this green space and the effect on the view towards the Endrick and the hillscales of the Kilpatrick Hills and the Campsie Fells will be highly detrimental.

The proposed development seems to be over-bearing, out-of-scale and out of character compared with existing development in the vicinity, with the proposal of 16 -18 houses in this relatively small field this is more than all the combined houses south of the Buchanan arms hotel.

Parking/traffic.

It is very apparent living in Drymen that during the summer and at weekends the village struggles with the volume of traffic passing along the main street. This is highlighted on fine weekends and church gatherings. In these instances the southern entrance to the village can be full of roadside parked cars all the way from the church, along the road side opposite the Buchanan arms up to the crossroads and village square.

Walking from one end of the village to the other when large coaches and high volume traffic is trying to pass, coupled with the roadside parking makes for an intimidating and unpleasant passage for anybody but especially very young and elderly where it is potentially dangerous. The need to rectify the traffic and the parking has been identified in several reports and yet it seems very little is being considered to ameliorate this. The current proposals to add 16 + 36 house will give rise to even more road and parking pressure.

The Recent Community Action Plan- is presumably carried out to take heed of the need and desire of the local community. The community’s top ten priorities from the 2012 to 2017 report are listed as:-priorities as voted for at the community event

1. Better public transport
2. Develop garage and Salmon Leap sites
3. Increased and better managed parking
4. Play parks and recreation areas
5. More events in Village Square

If you feel any information in this report is incorrect please contact us by email at hello@ourlivelpark.com
Main Issues Report Our Live Park Comments Received

6. Public Toilets
7. Sports Facilities
8. Childcare/out of school care
9. Keep Drymen Clean and Tidy
10. Village square re-development

New housing does not feature in what the majority of the local community have stated they want or need.

*Background Report: DRYMEN AND GARTOCHRARN LANDSCAPE CAPACITY ASSESSMENT Feb 2010
(Note: Assessment can be found within the downloads section of www.ourlivelpark.com)
Suggestions for Improved Amenities:

There are obviously very many tourists who pass through on the way to the east side of the loch and the west highland way. Drymen however, does not encapsulate a must visit destination that other national park centres achieve such as Aviemore in the cairngorm, Bets-y-coed in snowdonia or Ambleside in the lake district.

- The part time pedestrianisation of the village green/centre for food markets, open cafes could be a pleasant addition enriching and utilising the attractive central green of main street.

- For visiting and local families alike, a visible, attractive and accessible play park coupled with easy parking could be visually appealing but importantly provide a further draw for visiting families to Drymen, much as Balloch country park is.

- Parking in its own right, on the site MIR62, could be sympathetic to the natural environment, low profile but a useful addition to the village’s needs.

- Accessible good quality tourist information could add to Drymen’s importance and visibility (a building may not be necessary a small booth/smartboard may be helpful).

- Typically access to facilities or clubs involves travel to Balfron or Glasgow. Utilising any free areas to promote healthy living and for improved access to sporting facilities will benefit the community.

- Other things which could encourage tourism and yet be sympathetic to the wildlife would be encouraging the MIR62 field to use as a paddock for grazing animals, instead of allowing developers to lock land away and allow the appearance to degrade.

- Finally it is acknowledged that appropriate housing in the right context can be beneficial to a community. With this in mind further serious consideration to other opportunities where there seems a good will for development should be followed up rather than overdeveloping any one site. This was documented in June 14 DCC.
meeting, where development of the main square garage, and the salmon leap seemed popular alternatives.

- Finally with respect to securing council accommodation to fulfil the numbers, required by the council, there have been several opportunities to purchase ex-council houses within the village. There are also other smaller villages which struggle to fulfil a vibrant self-sustaining population and as such should possibly be earmarked for expansion as opposed to a larger village such as Drymen where many amenities are at or under capacity.

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.11 Drymen

Customer Reference: 00107
Customer Name: Non Attributable
Comment Reference: LDP01/MIR/CONS/00107/1/072
Comment Method: ONLINE
Customer Type: Information not available

Verbatim Comment:
New Housing Development in Drymen

1. It's bad enough trying to come up the road past the church when there are weddings, funerals plus Sunday Service for the cars parked on the road. Someone will be killed before long. The field would be better by far used for a car park.

2. If Drymen got any bigger we would need a full time doctor back.

Drymen is busy summer and winter with all its visitors we do not need any more people clutter it up. 16 houses, 30 odd cars, what are the planning people thinking. It's supposed to be a village not a town. We don't need townies. Villages are small friendly places. Keep the village green and keep its architectural sole and don't crowd out the lively buildings on either side. Use the Stirling Road plan for houses and give us a better parking space. The Church would benefit, so would the hotel. Keep Drymen as it is and maybe just make it a one way system, cause someone will get killed. A village person. Plus you have not given people enough time. We have had no meetings about this. You just can't take this over. We are the Drymen village who care about it's Consultation of National Park development plan for Drymen.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
We believe an opportunity to allow a controlled amount of low cost housing in Drymen.

Concerned by the assumption that because Drymen already has a mix of housing, it should be expanded ahead of other local villages. Expansion should be equal and proportionate across the whole of the National Park. Care should be taken to preserve the charm and nature of the village, for residents and visitors alike. Additional housing in the village should be balanced, both in overall numbers and type of developments permitted i.e. not exclusively affordable housing.
5 Placemaking - What sites should be considered for development? >> 5.11 Drymen

Customer Reference: 00107
Customer Name: Non Attributable
Organisation: (If applicable)
Comment Reference: LDP01/MIR/CONS/00107/1/070
Comment Method: ONLINE
Customer Type: Information not available

Verbatim Comment:
I attended the Charettes in Drymen as a resident of Buchanan Castle Estate and was amazed to discover that the planners, while intent on providing a more cycling/walking/riding-friendly way of getting between Drymen and Balmaha via Buchanan Estate, were planning to drive a path through the presently privately-owned and heavily wooded area to the south of the estate, unaware that there already exists a well-defined path to the north of the estate which runs parallel, and close to the existing road. This would be a much cheaper option to develop and would cause much less disruption to the existing woodland in addition to being much more accessible from the village itself.

I hope that you note that I mention riding (on horses) as well as cycling and walking. As a horse owner who has lived in the area for over 60 years, I have enjoyed the opportunity to ride on the many forest paths and estate roads, but I do feel that the Park is missing the great potential to develop the riding facilities in the Park area. There are many areas throughout Scotland, England and Wales where local tourism has been greatly enhanced by the provision of connecting bridleways and accompanying livery and rider accommodation offering holiday opportunities for the riding community. So much of what is needed already exists in the park thanks to the Forestry Commission. Local farmers have shown willingness to diversify in many different ways and would surely welcome the opportunity to convert some of their buildings into stabling for trekkers, while also offering B&B for the riders and additional facilities in the way of jumping tracks or dressage areas at very little extra cost. My dream would be to be able to ride the whole West Highland Way. I believe that people would come from all over Europe to be able to do that. The British Horse Society have a particular interest in developing safe bridleways throughout Britain and would be willing participants in any schemes you might wish to explore.”
5 Placemaking - What sites should be considered for development? >> 5.11 Drymen

I would like to find out when the next community consultation of the Main Issues Report is in Drymen as there are a number of people that can not make the Drymen show and everyone I have spoken to does not know about it.

Customer Reference: 00107
Customer Name: Non Attributable
Comment Reference: LDP01/MIR/CONS/00107/1/068
Comment Method: ONLINE
Customer Type: Information not available

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
What a pity it was that you permitted the building of a modern red-roofed bungalow across the road from Drymen Church. For a few months after the building of the Drymen Bypass we were treated to a magnificent view of Drymen Church as we travelled South on the bypass. Standing alone against a backdrop of beautiful trees, it was the kind of view to grace a calendar, but the building of the bungalow greatly diminished the impact.

Should you grant permission for building in the field next to the church you can say goodbye to all charm. As stated at the last community meeting, there already is existing planning permission for more than twice the amount of housing proposed for the site adjacent to the church. If there is such a pressing need for more housing, why has this much more acceptable development not gone ahead? Even the old Salmon Leap site has not proved sufficiently attractive to developers, or like the Church site too steep to be easily developed.

Drymen is a gem of a village and as planners it is your responsibility to develop it as sensitively as possible. You are the guardians of our heritage and while developers are only in it for profit, you are in it for posterity.
If you allow this development surely you will be breaking your own rules regarding expansion having to fit in with the existing surroundings. This site is opposite several detached houses with adjacent gardens and the erection of 16 homes being a mix of semi-detached and apartments certainly does not seem to merge in with the existing dwellings.

The possibility of additional motor vehicles entering Main Street just above the bend at the Church seems to be a road hazard that does not need to be created.

Has a nature study been done to ascertain who or what lives on the site at the moment. If there is, I would like to see it please.
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.11 Drymen

Customer Reference: 00107
Customer Name: Non Attributable
Comment Reference: LDP01/MIR/CONS/00107/1/016
Comment Method: ONLINE
Customer Type: Information not available

Verbatim Comment:
Can anyone explain to me what the proposal MIR62 is? It appears to propose 16 houses at the entrance to Drymen on a steep, V shaped boggy site - meanwhile the decade old proposal for H16 fails for lack of funds/no commercial viability.

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.11 Drymen

Customer Reference: 00107
Customer Name: Non Attributable
Comment Reference: LDP01/MIR/CONS/00107/1/011
Comment Method: ONLINE
Customer Type: Information not available

Verbatim Comment:
"Horrified by the idea of MIR 62 housing development - feel so powerless, planners don't seem to be listening"
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<th>5 Placemaking - What sites should be considered for development? &gt;&gt; 5.11 Drymen</th>
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Verbatim Comment:
I would like to offer the following comments on the Plan for Drymen.

1. Tourism is the major 'industry' for Drymen. And I believe that to keep tourists coming to our village, it is absolutely vital to retain it's unique character. Consequently, I think the planned development MIR62 would be a disaster. Aesthetically, it would spoil this approach to our village. The site is totally unsuitable for this sort of high density housing. The road would not cope with the additional traffic and there would be pressure on local services.

In addition, I feel the planned development RA2 is also inappropriate. Tourists do not want to be welcomed to our lovely village by a field full of industry / business. The road at this point twists and turns - I can't imagine additional traffic turning off the main road would be desirable or particularly safe.
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.11 Drymen

Customer Reference: 00107
Customer Name: Non Attributable
Comment Reference: LDP01/MIR/CONS/00107/1/006
Organisation: (If applicable)
Comment Method: ONLINE
Customer Type: Information not available

Verbatim Comment:
"I agree with all the identified main issues. I can agree with most of Option 2, and am pleased to see the village square included as a priority - the lack of a footpath is a death trap on the west side, walking children to school. However I cannot agree with the proposed development of land north of the cemetery for 16 houses - completely out of character in a conservation area. I will go into more detail.

This is a rather sudden change to the National Park Plan and there has been a short time for consultation and reaction. The village were very involved in consultation on the plans up until now, and the 2013-2018 Community Action Plan made village priorities very clear. This site and the number of houses is all new, and presented with a short time for further consultation.

The substantial problem with this proposal is the high density nature of the development. This is not a suitable development site for 16 homes.

My substantive problems with the proposal are as follows:

PROCESS:
This is a dramatic change to all previous plans, developed through consultation with the community through the Community Council and the Drymen Community Development Enterprise Trust. The idea of building a few houses on the site next to the churchyard was mentioned briefly towards the end of last year’s charette meetings, but it doesn’t reflect opinion in the village. At the time the suggestion was for less than a handful of houses. Now it is for 16.

PRIORITIES:
This is out of sync with village priorities. We all put a lot of effort into the Community Action Plan 2013-2018 developed through democratic process by the Community with the National Park. It appears to have been in vain, because apart from the importance of the development of the Square, everything else has been ignored. The relevant parts come in Theme 4:
"Housing Development and Local Economy.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivelpark.com
Priority 1  Develop vacant sites
- Look at options for community ownership of ‘garage site on square.
- Encourage and promote redevelopment of Salmon Leap site

Priority 2  Affordable housing
- Work with NPA and others to ensure any new housing development includes provision for affordable housing."

POLICY:
Developing the field next to the cemetery is contrary to the National Parks own policy: your Landscape Capacity Report 2009 says "Given the particular sensitivity of the area, the local plan’s housing allocations in Drymen. must be appropriately located and positively contribute to the character and creative development of these settlements" and: "The southern approach to Drymen is of heritage significance"

CONSERVATION:
The conservation appraisal sensitivity report for the area says: ""Views out to the surrounding countryside make a key contribution to the character of the conservation area, particularly along the open side of Main Street at the southern end".  This site is at the entrance to the village most used by visitors, coming from Glasgow and heading to Loch Lomond.  Building on this field would change the open aspect of the view of fields and the church, leading to a much more urban view of a modern housing development at the entrance to the village, which is completely out of character for the area.  The terrain of the site, dipping steeply, makes it expensive to develop - a particularly odd choice for sustainable development.

ARCHITECTURE:
The southern entrance to Drymen is within the Conservation area.  The Church and the house at the other side of the site are both listed.  The conservation area status is supposed to make sure that any new building preserves and enhances the character and appearance of the area.  As the Park’s own planners have stated on previous occasions, the area is made up of houses set in substantial gardens.  The space between buildings is regarded as an important element of the character of the Conservation area and this would be eroded by this development.

Development on the edges of villages is supposed to be on gap sites, not ribbon development.  A gap site is a site between two houses, not a house and a churchyard.  It will make the entrance to Drymen - the main way most villagers and visitors come into the village - feel suburban.

ROAD SAFETY:
16-18 houses means about thirty extra cars pulling out of the steep site at right angles to Main Street.

NATIONAL PARK PRIORITIES
The National Parks Act 2000 sets out four statutory aims for National Park.  The first is to conserve and enhance the natural and cultural heritage of the area.  The fourth is to support economic and social development of the areas communities.  The Act says if it appears that there is a conflict between the first aim and any of the others then
Main Issues Report Our Live Park Comments Received

we must give greater weight to the first. (this is known as the Sanford Principle).

Policy NP1 Development in the National Park states: Only development proposals which contribute towards the collective achievement of the National Parks four statutory aims will be supported and planning decisions will be based on an assessment of the impact of the development on the areas special qualities. Where development proposals are likely to create conflict between the first and any of the other three statutory National Park aims the Sandford Principle will apply and greater weight will be given to the conservation and enhancement of the natural and cultural heritage of the area. Where the impacts of a proposed development on the special qualities of the Park are uncertain but there is sound evidence for believing that significant irreversible damage could occur the Precautionary Principle will be applied and such developments will be resisted

OTHER SITES:
The community action plan - and every other consultation there’s been including the National Park’s Charette - have public opinion strongly in favour of developing the Salmon Leap site - but it would seem that the planners have made no attempt to engage the owner of the site in a conversation about the possibilities of development. Stirling Council should consider the option of buying existing housing stock as it comes onto the market in the last two years five homes have sold in Drymen within the council budget for social housing.

The main reason it is not an appropriate development in the conservation area is primarily because it is high density - the number of houses. If the suggestion was for two or three houses with gardens, in keeping with the surrounding conservation area, then it would make sense. But as it stands, for 16 homes, I oppose it - as indeed do the National Park's own policies".

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
I agree that the site identified may be suitable for development. However, I strongly believe that 16 units are far too many. Half of that would be more than enough. This site has been identified as a conservation site with listed buildings to the north and south. Should we just ignore this previous assessment? Surely any development MUST take this into account and be sensitively addressed. In addition the infrastructure of schools and public transport would need to be seriously addressed as there is already great pressure on the school roll, traffic in the village extremely congested and the entrance to the site would sit at the narrowest part of the main road. I therefore feel I must object to this proposal.

It would be nice if the wishes of the village would be taken into consideration for once.
Apologies for not making reference to specific parts of the MIR but I am just back from holiday and need to get this form to you without taking the time to study the MIR again. I have two main points to make. I feel that there is quite enough ground zoned for building in Drymen already without zoning the field next to the church for a further 16 flats a development that would be completely out of keeping with the rest of the village and to the detriment of the charm and attraction of one of Scotland’s most visited tourist villages. Green spaces are essential to the beauty of Drymen although I have no objection to the present zoning and there are I suspect other more suitable sites for discreet development.

What I do think that you should be doing is building on the present facilities for exploring the countryside, especially the west highland way, the cycling routes and the existing network of forestry tracks to develop an equestrian trekking route similar to the west highland way, which would attract riders from all over the world. This would provide employment for many in the countryside and bring business to the hotels, and other tourist accommodation along the way with the additional need for liveries which would be a welcome earner for local farmers and landowners. Trekking is a world-wide industry and one that the park would do well to encourage and develop. There are plenty of experts around who can advise on how it is done elsewhere in England, Wales and the rest of the world. This kind of activity is exactly the kind of development that is in keeping with the first stated aim of the park.
I write now simply to register the support of Montrose Estates (1993) Ltd, would be dependent on receiving rather more information on what the Drymen-Balmaha concept might entail.

It is essential that the Estate addresses a number of matters and these are currently being assessed. A positive attitude towards economic, tourism, agricultural, housing and golfing matters will be essential on the part of the Estate, but equally as important, the local Planning Authority’s approach to any such proposals must also be supportive.

The current approach being presented by the staff of LL&TTNPA certainly appears to be appreciative of the challenges facing landowners, and the Duke and Lord Graham are encouraged by this.

It is anticipated that the expectation for renovation or new development will be tempered by scale and design considerations and the Estate will seek to work with the National Park towards achieving appropriate forms of development as and when the opportunities arise.
However I feel that to retain the character and charm of Drymen there should be balance on the level of total redevelopment within the village.
For the following sites that are carried forward from the ALP, we recommend early engagement with HS on development proposals which may raise complex or significant issues for the assets listed below. This will be key to avoiding adverse impacts including respecting the site and setting and character of assets and optimising positive outcomes for the historic environment:

Drymen

ST12/MIR66 Preferred existing site Drumbeg Quarry

The allocation includes parts of the SM7037 Drumquhassle, Roman Fort and Annex 300m NNW of Easter Drumquhassle. Any development would need to be designed to ensure that there is no adverse impact on the setting of the monument and any works within the area would require Scheduled Monument Consent.
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.11 Drymen

Customer Reference: 00187
Customer Name: 

Verbatim Comment:
Site north of graveyard

A minor watercourse runs along northern boundary of this site. This poses a potential risk of flooding. We would be likely to object to the development of this site unless appropriate additional information is submitted / the site plan is amended to remove the sections thought to be at risk. A basic FRA will be required either prior to, or in conjunction with any planning application. This will need to define the areas at risk of flooding, the relative vulnerability of the proposed use and appropriate detailed design layout and levels.

water environment developer site requirements and comments: Buffer strip required, there may be restoration opportunities
Drumbeg, near Drymen (local plan site ST12)

Permanent waterbodies also present on site could represent a potential flood risk in the event of overtopping.

Minor watercourse flows through site along with a number of permanent waterbodies/ponds. A basic FRA will be required either prior to, or in conjunction with any planning application. This will need to define the areas at risk of flooding, the relative vulnerability of the proposed use and confirm design layout and levels. We would be likely to object to the development of this site unless appropriate additional information is submitted / the site plan is amended to remove the sections thought to be at risk.

Foul Drainage Comments: No public sewer nearby. Would require private treatment but limited capacity in water environment. Constrained site therefore.

Water Environment comments: Buffer strip required, there may be restoration opportunities.
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.11 Drymen

Customer Reference: 00187
Customer Name: 
Comment Reference: LDP01/MIR/CONS/00187/4/030
Organisation: SEPA
(If applicable)
Comment Method: EMAIL
Customer Type: Key Agency

Verbatim Comment:
Drymen South Rural Activity Area (local plan site RA2)

No flood risk apparent.

Foul Drainage Comments: Site is adjacent to Buchanan Castle STW. Issues with capacity in network and STW. This would need checked with ScWater. May need developer contribution to upgrade. Would not want specific treatment plant for this development.
**Chapter Commented on:** 5 Placemaking - What sites should be considered for development? >> 5.11 Drymen

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Former salmon leap site (local plan H17)

A minor culverted watercourse potentially flows through the site. This should be investigated as part of the FRA. Consideration should be given to PAN 69 which states that "buildings must not be constructed over an existing drain (including a field drain) that is to remain active". We would be likely to object to the development of this site unless appropriate additional information is submitted / the site plan is amended to remove the sections thought to be at risk. A basic FRA will be required either prior to, or in conjunction with any planning application. This will need to define the areas at risk of flooding, the relative vulnerability of the proposed use and appropriate detailed design layout and levels.
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.11 Drymen

Customer Reference: 00187
Customer Name:
Comment Reference: LDP01/MIR/CONS/00187/4/028
Comment Method: EMAIL
Organisation: SEPA
Comment Type: Key Agency

Verbatim Comment:
Gartness Road (local plan site H16/T7)
No flood risk apparent.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
Customer Reference: 00187
Customer Name: (If applicable)
Organisation: SEPA
Comment Reference: LDP01/MIR/CONS/00187/4/027
Comment Method: EMAIL
Customer Type: Key Agency

Verbatim Comment:
Old Gartmore Road Drymen G63 0AA

We would have no objection to the allocation of this site on flood risk grounds.

Old Gartmore Road Drymen G63 0DY

A minor watercourse runs through this site, this poses a potential risk of flooding. A basic FRA will be required either prior to, or in conjunction with any planning application. This will need to define the areas at risk of flooding, the relative vulnerability of the proposed use and confirm design layout and levels. We would be likely to object to the development of this site unless appropriate additional information is submitted / the site plan is amended to remove the sections thought to be at risk.
5 Placemaking - What sites should be considered for development? >> 5.11 Drymen

A minor watercourse runs through this site, this poses a potential risk of flooding. A basic FRA will be required either prior to, or in conjunction with any planning application. This will need to define the areas at risk of flooding, the relative vulnerability of the proposed use and confirm design layout and levels. We would be likely to object to the development of this site unless appropriate additional information is submitted / the site plan is amended to remove the sections thought to be at risk.

Customer Reference: 00187
Customer Name: SEPA
Comment Reference: LDP01/MIR/CONS/00187/4/026
Comment Method: EMAIL
Customer Type: Key Agency

Verbatim Comment:
Land between B858 Stirling Road and A811 Drymen Bypass

We would have no objection to the allocation of this site on flood risk grounds.

Customer Reference: 00187
Customer Name: SEPA
Comment Reference: LDP01/MIR/CONS/00187/4/025
Comment Method: EMAIL
Customer Type: Key Agency

Verbatim Comment:
Balmaha Road Drymen G63 0DY (site T6)

We would have no objection to the allocation of this site on flood risk grounds.
There are existing consents for residential development in Drymen which have not progressed. It is understood that the proposal for 16 houses (Site MIR62) is for affordable homes to be filled from Stirling’s housing waiting list. This may contribute nothing to local needs housing. MIR62, if progressed is likely to be filled with families with children and is located at some distance from the Primary school on a busy, narrow road. If the need can be justified, a location closer to the school and the village centre could be preferable.

We support the need to progress improvements to the village square.
## 5 Placemaking - What sites should be considered for development? >> 5.11 Drymen

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**Verbatim Comment:**

The preferred option seeks to support improving non-vehicle access with Balmaha. While this principle is supported in its own right, it is suggested that this may have limited impact on the traffic problems which occur only a handful of times in the year, and is therefore not a solution to such.

Any major tourism / recreation development to the south of the A811 (ST12), must ensure safe pedestrian and cycle linkages to the town, in particular in terms of crossing the A811.

The Council support the principle of public realm improvements to Drymen Square in conjunction with the provision of public parking at Winnoch Court and Stirling Road sites.
5 Placemaking - What sites should be considered for development? >> 5.11 Drymen

I am against this proposed development of 16 houses (MIR62) in Drymen for the following reasons:
- No guarantee the locals will get these houses.
- Local resources such as doctors, Drymen school & Croftamie Nursery will be overstretched.
- Drymen has a real sense of community - this would mean too many people and nowadays 16 houses can mean nearly 32 cars adding to the traffic on Drymen Main Street.
- The church opposite the proposed site is a listed building. This is a conservation area. A highly populated development is inappropriate.
I am writing about the proposed building of 16 houses in the field beside the church and graveyard, in Drymen. I am writing to express my concern about building in this area.

The reasons for this are as follows:

I am very anxious that the existing infrastructure in the village will struggle to accommodate 16 more families, especially if these are young families who want to send their children to Drymen primary school or Croftamie nursery. Both are already overstretched with the need for composite classes. I am also worried about access to the road, especially if each house hold has at least one car. I am concerned that extra traffic, coming from the field onto the main road is going to cause more problems with parking/driving up and down the road, which has not been fit for purpose for a long time. I am also concerned, given that there is current planning permission to build on the field on the Stirling Road site, that Drymen, instead of having one development, will have two.

I absolutely feel that there should be more affordable housing in Drymen. I think it's a shame that locals are unable to stay in the village because it is too expensive, but I understand that whilst the proposal is for affordable housing in the main street field, most of this will be sold to Stirling Council, who have stated that they could not differentiate between people who come from Drymen and have some connection with it, and those needing housing on Stirling council’s housing list, with no connection to Drymen. Whilst I agree that it would be helpful to have some sort of landscaping in the field on Main Street (and the one on Stirling Road) I wonder whether it is appropriate to have 16 houses squashed onto a site which is not flat. It worries me that the aesthetics of Drymen as a rural village might be spoilt if the approaching views are of a number of houses, clearly built more recently.
I am writing this short e-mail to ask you consider my view on the future developments in Drymen and in particular the plan to decide the future of plan MIR62.

The need for new housing in the local area of Drymen is clearly a requirement for not only Drymen but also Scotland as a whole.

My main issue is the choice of land that will be developed on. Brown field sites are costly in the short-term but choosing the "easy" option of greenfield sites is a very short-sighted approach.

The local authorities need to identify already spoilt and unused brown field sites. Only when they are converted from derelict land to land that is being used for a positive purpose should green field sites be looked at as possible areas to start the irreversible process of removing more food producing, natural land from our country.

If you need examples of areas that should be at the top of your list then feel free to contact me, I will take you on a local tour of your area of responsibility to show you the areas that are currently unusable and have the potential to provide the area with more housing and less pollution.

We have spent the last 500 years slowly reducing the efficiency of our land by our development. Whilst ignorance could have been an excuse 100 years ago, today the only excuse that can be offered is taking the quick and easy option with zero benefits to the future of our planet.
I am writing about the proposed development of the field next to Drymen church by building 16 houses. I feel most strongly that I must object to this proposal for the following reasons.

1. The siting of the development at the entrance, which at the moment is one of the most attractive areas of the village, will destroy the whole rural look of the village and ruin the first impression for thousands of visitors. Drymen depends on the tourist trade to support the local businesses and to provide work for the local people; surely anything which detracts from the appeal of the village must be bad for the area. People don't come to Drymen to be greeted by a modern urban housing development.

2. Access to the village is already problematic, with the number of cars parked along the road, the Main Street is reduced to a single lane road most of the time so that entering and leaving the village can be a bit of a nightmare. If you add to this the considerable number of cars that will be accessing this development the congestion is likely to be horrendous.

3. There is already planning permission for a major development at Stirling Road, if this second proposal also goes ahead it will greatly increase the population of the village. Not only will this seriously detract from the sense of community that currently exists but such a sudden increase will put a considerable strain on local resources. There will be a large influx of children at the school and access to the school on Gartmore Road is already difficult, more traffic will make it even more dangerous than it is at the moment. Also, the health centre may also find it difficult to cope with the increased number of patients especially as it is about to lose its only doctor.

I hope you will take notice of these comments.
"I despair.

Is it the deliberate intention of various levels of government to deliberately destroy all that is good about Drymen. Our medical centre's excellent service to the community is now sadly depleted.

To impose 16 "council houses" with the additional traffic onto an already dangerous road, thanks to muddled thinking be the roads department, is simply daft. This will detract from the impressive entry to the village and gateway to Loch Lomond. Such a development will radically change for the worse the open aspect of this area.

This proposition plus the outstanding development between Gartness Road and Stirling Road will put an intolerable strain on all services: schools, medical center etc.

I strongly object to this proposal."
### 5.11 Drymen

"I wish to raise my concerns regarding the proposed development of 16 houses next to the church.

1. Drymen has a unique role as a tourist hub for the national park. Tourism is the life blood of many businesses in the village and we need to retain that unique small village character.

2. The Main Street can become easily congested and additional traffic would be a problem.

3. Additional numbers would put pressure on existing services. (health/schools etc)

4. The site is unsuitable for a project like this and would be detrimental to the ambience of the village."
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.11 Drymen

Customer Reference: 00107
Customer Name: Non Attributable
Comment Reference: LDP01/MIR/CONS/00107/1/064
Organisation: (If applicable)
Comment Method: ONLINE
Customer Type: Information not available

Verbatim Comment:
"Why should Drymen be expected to have a further 16 modern houses built on this site between two listed properties. Drymen is a village and I think the planning authorities who decide that we should have these houses probably do not live in the area and therefore do not have the knowledge that we suffer from lack of buses and the primary school could not cope. Maybe those who decide what should happen to us are jealous that we live in a quiet desirable village and wish us to cater for maybe less desirable people that nobody else wants.

Why spoil a village that gets many visitors from far afield with houses that are not in keeping with the present architecture. The Main Street in Drymen is at the moment waiting for an accident to happen. Cars are parked within White designated lines and cars travelling North outside Buchanan Arms are suddenly faced with a blind spot going into a single lane.

Please let our village stay as a welcoming village for tourists without spoiling it."
Proposed 16 house development on the site between Drymen church and Drymen old manse it not suitable due to steepness of site and entry on to an already busy road. Suggest the other side of the village past the Ardmore Gardens on the right hand side as more suitable there is a huge field there privately owned but I am sure it could be purchased.

With regards the proposed development of 16 houses on the field next to the cemetary in Drymen - this is a highly unacceptable proposal. The site in question is within a conservation area and this high density development will change the aspect of this area of the village forever. This development will bring with it the introduction of around 30 more cars, exiting the site onto a busy road. There is already a parking issue around the church on a Sunday, and within the village as a whole. Drymen draws tourists and visitors through it’s close proximity to the West Highland Way and it’s attractive outlook - if this is changed to it’s detriment, it cannot be undone.
A large proportion of Drymen is a conservation village and the first of the four aims of the National Park (Scotland) 2000 Act of "To conserve and enhance the natural and cultural heritage" should be the over riding aim of every planning decision made in the Conservation Village/Park. Therefore I am concerned that if the area beside Drymen Church is classified as "zoned" for 16 flats/houses that it will breach the first aim. If feel that it could be zoned for maybe 3 or 4 houses of a sizeable nature and large gardens so as to compliment the houses in adjacent area. I hope you will consider my opinion.
I would like to register my concern about the proposed development adjacent to the church at the southern end of Drymen (MIR62).

This is an inappropriate site due to the road restrictions and the historic / architecturally significant nature of the existing buildings. If development is required, it would be far more appropriate to encourage development on the Stirling Road site within the heart of the village where local services can be more readily accessed.
As a resident of the village of Drymen I would like to object strongly to the plans for the field next to the Church. I believe it to be completely unsuitable for a high density housing development of 16-18 units. It would completely alter the character of that area of the village, not only for the villagers, but also for the many thousands of visitors on their way to Loch Lomond. This field also provides a very important buffer area between the village and the by-pass.

Further, I am concerned at the extra traffic this would generate with possibly 35-40+ cars entering and existing and most importantly, where are they and their visitors going to park? Does this mean long lines of cars parked here at the side of the road and will they just spill into the church car park? (surely private property).

Together with the other 36 homes already granted planning permission on the Stirling Road site, 56 homes would put a huge strain on village resources - school, doctor, post office, shops etc.

I firmly believe that small green areas such as this are really important in a small village like Drymen for identity individuality and to preserve and conserve that which is valuable and important.

Surely the Stirling Road site (which I have no doubt will be developed and built) is enough. I see no way in which conserving and enhancing will be achieved by this plan. I hope you will consider and listen to the view of the villagers on this subject.
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.11 Drymen

Customer Reference: 00129
Customer Name: Ian Todd
Comment Reference: LDP01/MIR/CONS/00129/1/001
Comment Method: LETTER
Organisation: (If applicable)
Customer Type: Individual Resident

Verbatim Comment:
The Development Plan for Drymen MIR62
I wish to object to proposed development.

1. Owing to shape of ground I presume the houses would be built near the road side. This would not enhance the view approaching the village.

2. More cars entering a busy road - On Sundays and on days of weddings and funerals the road is very congested.

3. Drymen is a small village - Local resources would be stretched to breaking point. No decisions should be taken until the Gartness - Stirling Road site is resolved.

There is no guarantee that local people would get them.
I am somewhat concerned at the rather sudden change to the National Park Plan and the short time for consultation and reaction.

The Drymen Community Trust has been very involved in consulting with the village on the plans up until now, and the 2013-2018 Community Action Plan made village priorities very clear. This site and the number of houses is new, and there's little time for further consultation.

The substantial problem with this proposal is the high density nature of the development, and the real danger is that the National Park is re-zoning this site as a suitable development site for 16 homes.

The substantive problems with the proposal are as follows:

PROCESS:
This is a significant change to all previous plans, developed through consultation with the community through the Community Council and the Drymen Community Trust. The idea of building on the site next to the churchyard was mentioned briefly towards the end of last year's meetings, but it doesn't reflect opinion in the village.

PRIORITES:
This is out of sync with village priorities. We all put a lot of effort into the Community Action Plan 2013-2018 - developed through democratic process by the Community with the National Park. It now appears to have been in vain, because apart from the importance of the development of the Square, everything else has been ignored. The relevant parts come in Theme 4: Housing Development and Local Economy Priority 1 Develop vacant sites look at options for community ownership of 'garage site on square. Encourage and promote redevelopment of Salmon Leap site

Priority 2 Affordable housing

Work with NPA and others to ensure any new housing development includes provision for affordable housing.
Main Issues Report Our Live Park Comments Received

POLICY:
Developing the field next to the cemetery is contrary to the National Parks own policy: their Landscape Capacity Report 2009 says "Given the particular sensitivity of the area, the local plan's housing allocations in Drymen... Must be appropriately located and positively contribute to the character and creative development of these settlements." and: "The southern approach to Drymen is of heritage significance"

CONSERVATION:
The conservation appraisal sensitivity report for the area says: "Views out to the surrounding countryside make a key contribution to the character of the conservation area, particularly along the open side of Main Street at the southern end." This site is at the entrance to the village most used by visitors, coming from Glasgow and heading to Loch Lomond. Building on this field would change the open aspect of the view of fields and the church, leading to a much more urban view of a modern housing development at the entrance to the village, which is completely out of character for the area. The terrain of the site, dipping steeply, makes it expensive to develop - a particularly odd choice for sustainable development.

ARCHITECTURE:
The southern entrance to Drymen is within the Conservation area. The Church and the house at the other side of the site are both listed. The conservation area status is supposed to make sure that any new building "preserves and enhances" the character and appearance of the area. The area is made up of houses set in substantial gardens. The space between buildings is regarded as an important element of the character of the Conservation area and this would be eroded by this development.

Development on the edges of villages is supposed to be on gap sites, not ribbon development. A gap site is a site between two houses, not a house and a churchyard.

ROAD SAFETY:
16-18 houses means about thirty extra cars pulling out of the steep site at right angles to Main Street.

NATIONAL PARK PRIORITIES
The National Parks Act 2000 sets out four statutory aims for National Park. The first is to conserve and enhance the natural and cultural heritage of the area. The fourth is to support economic and social development of the areas communities. The Act says if it appears that there is a conflict between the first aim and any of the others then we must give greater weight to the first. (this is known as the Sanford Principle).

Policy NP1 Development in the National Park states: 'Only development proposals which contribute towards the collective achievement of the National Parks four statutory aims will be supported and planning decisions will be based on an assessment of the impact of the development on the areas special qualities. Where development proposals are likely to create conflict between the first and any of the other three statutory National Park aims the Sandford Principle will apply and greater weight will be given to the conservation and enhancement of the natural and cultural heritage of the area. Where the impacts of a proposed development on the special qualities of the Park are uncertain but there is sound evidence for believing that significant irreversible damage could occur the Precautionary Principle will be applied and such developments will be resisted"
OTHER SITES:
The community action plan - and every other consultation there's been including the National Park's, have public opinion strongly in favour of developing the Salmon Leap site - but the planners have made no attempt to engage the owner of the site in a conversation about the possibilities of development. I understand that the planner at the meeting indicated that he didn't know who owned the site - though it took a colleague about 10 minutes to find out. Stirling Council also does not seem to have considered the option of buying existing housing stock as it comes onto the market -in the last two years five homes have been sold in Drymen within the council budget for social housing.

ACTION:
Once the site is in the Plan and zoned for 1-6 houses, then it's already been decided and that it is suitable for 1-6 houses. It will then be very hard to block.

In A Guide to the Planning System in Scotland it says In all cases the council must make decisions in line with the development plan unless 'material considerations' justifying going against the plan..... Because the council need to consider all the relevant matters there is no guarantee that development plan policies will be the deciding factor in every case. But councils will usually approve applications for development which are in line with the development plan.

The reason it's not appropriate in the conservation area is primarily because it is high density - the number of houses - it is not the design or use of them, and that point needs to be made now. If the planners were arguing for two or three houses with gardens, in keeping with the surrounding conservation area, then it would make sense to let it go through and wait to see the detail of the developers plans. But as it stands, for 16 homes, I wish to formally oppose this change.
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.11 Drymen

Customer Reference: 00139  
Customer Name: Walter Hemfrey  
Comment Reference: LDP01/MIR/CONS/00139/1/001  
Organisation:  
Comment Method: EMAIL  
Customer Type: Individual Resident

Verbatim Comment:
Document supported, but recommend the following amendments-

(P.103) MIR62- identify new site for low density housing

(P.104) MIR 62 Opportunities- option 1 preferred MIR 62 Identify additional housing site on land north of cemetery for low density housing.

Questions- Drymen Q1- Agree preferred options 1 and 2, with recommended amendment- 16 houses replaced by low density housing.

Reasons for amendment-

1. The site of MIR62 lies within a distinctive, low density part of the village, close to the southern entrance/exit. This part of main street consists predominantly of detached houses with spacious landscaped settings.

2. The site is an important part of the Drymen conservation area, and is bound to the north by "The Laurels", 27 main Street, and beyond the cemetery to the south by Drymen church, both listed buildings. The church, recently restored and extended is probably the most significant building in the village. The Planning Authority has a duty to safeguard and enhance the character and appearance of the conservation area and the settings of listed buildings.

3. The site is steeply sloping and exposed to the bypass to the east, and therefore unlikely to be developed to the density proposed without impacting adversely on the conservation area.

4. Pedestrian movements in this part of the village are difficult if not dangerous by either a lack of roadside footway for much of the main street on the west side, from opposite the top end of the site MIR62 to the southern entrance to the village. On the east side most of the footway is narrow (single file).

If you feel any information in this report is incorrect please contact us by email at hello@ourlivelpark.com
For all of the above reasons, it would be totally inappropriate and damaging for the site to be developed to a density of 16 units with all the associated vehicles/pedestrain traffic movements.

Appendix E
Drymen- pages 69 and 70
Object to additional site for 16 houses (69) Summary (70).
Addition of a housing site of 16 units. It is not accepted that a development of 16 units stands to have significant environmental improvements. However, a much lower density development would.

Appendix F
P91 Drymen M62
(..
) Site was identified during the charrette process it is inappropriate to state that it had community sanction as such. The people who attended the charrette seemed to be in favour of the site being developed for housing but the density figure of 16 units was not disagreed/agreed.

It is not acceptable that a development of the density proposed will (..) generally positive environmental impacts- quite the reverse.

(Note: Appendix E and Appendix F of Strategic Environmental Assessment Draft Environmental Report can be found within the downloads section of www.ourlivepark.com)

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Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.11 Drymen

Customer Reference: 00145
Organisation: Scottish Water
Customer Name: (If applicable)
Comment Reference: LDP01/MIR/CONS/00145/1/008
Comment Method: EMAIL
Customer Type: Key Agency

Verbatim Comment:
Page 104, Drymen, there is limited capacity at Scottish Water’s waste water treatment works and early engagement is recommended should development come forward.
A number of sites included in the Placemaking section of the MIR concern us as they either contain or are adjacent to ancient woodland and others contain, or are in proximity to, other woodland/wooded sites. These are listed in the attached table with reasons for our concern.

We OBJECT to the following sites being identified for further development since this will lead to the loss of ancient woodland and damage to ancient woodland.

We consider that these site allocations should not be taken forward unless the protection of the adjacent woodland can be guaranteed and therefore request that where the allocations are taken forward, sufficient buffering between the proposed development and woodland should be identified in planning policy at the appropriate stage.

We recommend that if any protected species are present on the development site or adjacent to the development site that the appropriate survey work is carried out to determine the impacts that the development may have on the populations.

Linkage between Drymen and Balmaha - Within the ancient woodland (Ballyconachy Wood).

Please see Appendix 6 for further information
5 Placemaking - What sites should be considered for development? >> 5.11 Drymen

Customer Reference: 00160
Customer Name: Morag White
Comment Reference: LDP01/MIR/CONS/00160/1/001

Verbatim Comment:
MIR62 - I strongly feel that this site is totally wrong for 16 high density housing units for a number of reasons:

a) it will ruin the picturesque Main Street access to the village and consequently will not enhance Drymen's tourist credentials;

b) additional traffic will cause congestion on the already crowded Main Street;

c) the site is small and has quite a slope and is not suitable for this sort of development; and

d) along with the other housing developments(H16 & 17) in the plan, it would grossly upset the balance of our small community and put too much pressure on existing services. There is just too much housing on this plan, especially when compared with other villages within the park.
I am fully in support of improvements to the village square, to continue to identify Drumbeg Quarry to support its regeneration, redevelopment of the Salmon Leap site for affordable housing and non-vehicle access to Balmaha would add to the tranquility of the area and make it a safer place to cycle/walk with children.

I believe that the redevelopment of the Salmon Leap site H16, the garage in the square and the site with planning permission H17 should continue to be pursued as a priority whilst the Drymen Development Trust and the Community Council concentrate on their priorities to develop local amenities alongside these developments to cater for new people coming to live and work in Drymen.

I love the conservation area in which we live and moved here recently because of the 'green' spaces surrounding Drymen. I am strongly adverse to additional housing north of the cemetery MIR 62 for the following reasons;

It is contrary to the Statutory National Park Aims;
To conserve and enhance the natural and cultural heritage of the area.

It is contrary to the Landscape Capacity Report;
Where is states "open sites to the fringes are identified as being more important in the wider setting, particularly lower east, west and southern sides where new housing should be constrained, if the local character and village identity are to be safeguarded".

It is contrary to the Community Action Plan 2013-2018;
There is a clear consensus amongst Drymen residents to develop the garage and the Salmon Leap site ranked as 2nd priority with a focus on recreational, sports facilities and after school care to name but a few, comments were also made such as "preserving and enhancing the appearance of the village" with no mention of identifying other 'green' sites in Drymen to build affordable housing.

It is contrary to the Wildlife 2020 Plan;
Main Issues Report Our Live Park Comments Received

This is focussed on creating a sustainable future for the National Park's wildlife and the tourism that it brings. "We have built a picture of what success looks like and we use this vision to keep us focussed and recognise the benefits of our collective efforts for the long-term benefit of the park".

It is contrary to the Drymen Conservation Area Appraisal;
This states that "views out to the surrounding countryside make a key contribution to the character of the conservation area, particularly along the open side of Main Street at the southern (Buchanan Arms Hotel and Church) end."

This also states that "future management priorities are to encourage high quality design within the conservation area" to achieve this "the park authority will seek to achieve the highest design quality within the conservation area. New development should:
Fit within and complement the distribution and massing characteristics of the area". This would certainly not be the case with 18 houses on plot MIR62.

"Retain and reinforce the standard plot widths and respect important views in and out of the conservation area". This cannot be achieved with the high density being suggested.

In summary, I am in support of maintaining the aforementioned sites in paragraph 1 and 2 as a priority, but not that of MIR62. With reference to option 2 for the long term, whilst I do not agree that any houses should be built on green fields in Drymen, I understand there is a need for affordable housing. I feel the plot suggested in option 2, as a long term plan is better placed for houses than MIR62 because it does not sit within the conservation area, it would have less impact on the character and heritage of the village, houses could be more densely populated and it looks to be a flatter and less boggy site to develop.

From an amenity perspective I would like to see an emphasis on the development of new play provisions for children within Drymen, currently the play park is in need of an upgrade and is very waterlogged and due to its location, being surrounded by houses and not being visible from the road, it is underused. If vacant sites cannot be used for housing could they be considered for the development of a short woodland walk with play park stations around the walk with additional parking? Not only would it encourage families to be active and appreciative the outdoors, it would give tourists another reason to visit Drymen and bring in valuable additional trade for the local businesses.

A programme of other events like guided nature walks/talks for children around local woods, Forest School programmes run by the national park and partners or guided walks for retired people linking with Active Stirling walks officer meeting in the square. These would all be welcomed and not only bring people to the area but help educate children about the importance of their local environment and its habitat.

As an active member of the community, I would be happy to support the National Park on designated projects to enhance Drymen as a tourist destination and also for those that live here.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
In December 2013, ROCK DCM submitted a response to the Loch Lomond and Trossachs National Park Local Development Plan Call for sites consultation, making the case that a development proposal in Drymen should be allocated for housing development in the new Local Development Plan.

The Main Issues Report (MIR) has now been published, and we are disappointed to find that the site has not been identified as a preferred site. This document presents a case that in moving on from the Main Issues to the Proposed Plan, the site should be allocated for housing development.

Our case is based on the following aspects:

1. A development on the site will relate well to the village: all houses would be within easy walking distance of the village shops, services and facilities. It represents an infill or linkage between the two parts of the village: the traditional village and the Castle Gardens estate.

2. The development would be very inconspicuous from the village, from the surrounding area, and from main roads. This is due to its position behind a ridge to the west of Main Street, and to its setting within extensive tree belts and woodland. Indeed, unlike other sites identified in the MIR, its development would almost be invisible from the village and surrounding area.

3. We consider that the alternative sites identified in the MIR are, in comparison, far more prominent and would effectively change the character of Drymen. The site allocated for housing in the adopted local plan (Gartness Road / Stirling Road) will be prominently visible from the village centre, and is located in a dark depression. The opportunity site identified in the MIR would extend the village well into open, flat countryside. We argue here that it would disrupt the setting and character of Drymen when viewed from the A811 main road.

4. The Gartness Road / Stirling Road site has been allocated for housing development for nearly fifteen years and has not been progressed with. This must question whether the site is an effective part of the housing land supply, and we advocate that the new Local Development Plan should identify alternatives.

5. The site is free from technical constraints on its development, and we contend that it offers the best opportunity for an increased population in the village, a proportion...
Main Issues Report Our Live Park Comments Received

of which would be affordable. We have already had discussions with Stirling Rural Housing Association on their potential involvement. We explain in this document why additional population will re-invigorate the village: increase the trade for local shops and services and use of the local bus services. (APPENDIX ATTACHED)

Please see appendix 12 for further information

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.11 Drymen

Customer Reference: 00212 Organisation: Stirling Council
Customer Name: (If applicable)
Comment Reference: LDP01/MIR/CONS/00212/1/017 Comment Method: EMAIL
Customer Type: Local Government

Verbatim Comment:
In considering the MIR, the Stirling Council Planning Service has focussed on the settlements in close proximity to the planning authority boundary which are most likely to have impacts on the area. In terms of settlement specific proposals for Aberfoyle, Croftamie, Drymen and Killin we have no particular concerns, provided infrastructure constraints required for development are addressed.
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.11 Drymen >> 5.11.1

Drymen Question 1: Do you agree with the preferred Options 1 and 2? Why

Customer Reference: 00089
Customer Name: Fiona Lees
Comment Reference: LDP01/MIR/CONS/00089/1/001

Verbatim Comment:

The only objections I have are relating to the proposed development MIR62, the building of 16 houses in this area.

1. There are traffic problems in that area already at various times not least on Sundays and at funerals and weddings. I feel it would be dangerous to add significantly to this problem.

2. The entry to the village from the south is currently very beautiful and a tourist asset with the lovely trees, church and hotel and also discreet spaced out housing on the other side of the road. It would completely spoil the ambience of the whole access to the village.
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<th>5 Placemaking - What sites should be considered for development? &gt;&gt; 5.11 Drymen &gt;&gt; 5.11.1</th>
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**Drymen Question 1: Do you agree with the preferred Options 1 and 2? Why**

**Verbatim Comment:**
Yes we support improving non-vehicle access with Balmaha. The Balmaha settlement plan needs to reflect the outcome of the Charrette which recommended better links between Balmaha and Drymen to the South of the B837.
I strongly disagree with the plan to identify additional housing site on the church field site at the Southern entrance of Drymen (MIR 62) for 16 homes.

In your plan the main issues you identify for Drymen are:

- Potential limitations in capacity of primary school due to new housing in the school’s wider catchment
- Limited car parking at peak tourist season
- Need for improved traffic/on street car parking management
- Safeguard village character and improve public realm

All four of these issues will be made worse by the MIR 62 development if it goes ahead. The pressure on the school will increase, the car parking will get worse, the traffic implications of 16 new homes which (since public transport here is poor) could mean around 30 cars pulling onto Main Street. But most of all this development threatens to do significant irreversible damage to the village character.

MIR 62 is in a conservation area. It’s one of only seven conservation areas in the National Park. Of course this doesn’t mean building isn’t allowed, but it does mean development is supposed to "preserve and enhance" what is there. The conservation area guidelines say this would apply to the spaces between buildings as well as the buildings themselves. This area of the village is characterized by good size houses in good size gardens. Sixteen homes on this site is an entirely inappropriate density for the area. Precedent also argues against it. A recent proposal to build eleven houses on the site on edge of the village on the Balmaha Road was turned down because it was the wrong density for the conservation area, but this proposal would be just as dense.

MIR 62 sits at the centre of the green entrance to Drymen. It is many visitors way into the National Park. This area has been consistently described by the National Parks own documents as important and significant: "Elsewhere open sites to the village fringes are identified as being more important to wider setting, particularly to lower east, west and southern sides, where new housing and southern sides, where new housing should be constrained if local character and village identity are to be safeguarded"
Capacity Assessment for Drymen. David Tyldesley and Associates, 2009)"The southern approach to Drymen is of heritage significance, with the listed stone arched Drymen Bridge over Endrick Water, the Motte and the other buildings at Catter house at the junction of the A811 and the A809 and the listed church." (Landscape Capacity Assessment for Drymen. 2009). The conservation appraisal sensitivity report for the area says: "Views out to the surrounding countryside make a key contribution to the character of the conservation area, particularly along the open side of Main Street at the southern (Buchanan Arms Hotel and church) end." If it goes ahead this development will cause significant and irreversible damage to this special area. The conflict between development, and preservation of what is unique and special about an area is an issue planners must struggle with all the time. Indeed in setting up the National Park these conflicts were foreseen. The National Parks act 2000 sets out four statutory aims for National Park. The first is to conserve and enhance the natural and cultural heritage of the area. The fourth is to support economic and social development of the areas communities. The Act says if it appears that there is a conflict between the first aim and any of the others then we must give greater weight to the first. (this is known as the Sanford Principle). POLICY NP1 Development in the National Park states: "Only development proposals which contribute towards the collective achievement of the National Parks four statutory aims will be supported and planning decisions will be based on an assessment of the impact of the development on the areas special qualities. Where development proposals are likely to create conflict between the first and any of the other three statutory National Park aims the Sandford Principle will apply and greater weight will be given to the conservation and enhancement of the natural and cultural heritage of the area. Where the impacts of a proposed development on the special qualities of the Park are uncertain but there is sound evidence for believing that significant irreversible damage could occur the Precautionary Principle will be applied and such developments will be resisted" . There is sound evidence for believing significant irreversible damage could be done here by this development so I believe the Sandford Principle should apply and the designation of this field as suitable for development should be stopped. I believe the MIR 62 proposal stems from an understandable but unfortunate misreading of the communities wishes at the Drymen Charette. There is a huge desire in Drymen to see development on the Salmon Leap site and the derelict garage in the square. Both these brown field sites are in the centre of the village and they are an eyesore. When people were asked about what they wanted and they said they wanted development within the village boundaries it was these sites we were thinking of. We knew MIR 62 had previously had planning permission for three houses, so it seemed likely that this would go through again, and no one had too much of a problem with that, but there was no proposal for 16 homes on the site. If there had been, the community would have been horrified.

5 Placemaking - What sites should be considered for development? - 5.11 Drymen - Paragraph 5.11.2

There are other options for increasing the stock of council housing in Drymen. The council could buy existing houses as they come on the market (in the last year three houses have been sold inside the village for less than £102,000). The planners could be more pro-active about finding a solution for the Salmon Leap site (I phoned the owner, Colin Smith and he said he’d be interested in developing it, I do understand these things are tricky but if something could be done this would be a solution that would suit everyone). Or there is a site to the East of the village on the other side of the football field which the owner Campbell Graham had offered to the National Park for development. Although it’s not within the village boundaries in all other respects it’s a much better site. It’s flat, south facing, and it would mean there were houses on both sides of the football field which would make it more central to the community.
### Customer Reference: 00101

### Customer Name: Anita Dick

### Comment Reference: LDP01/MIR/CONS/00101/1/001

### Comment Method: OLDP

### Customer Type: Individual Resident

#### Customer Comment:

Regarding the proposed plan for housing of 16 units as per plan MIR62 I must strongly object. The area in itself has been designated as Conservation area. Listed buildings north and south of the site too. Do you just go and ignore this now? Whilst I could accept some housing half of the proposed would be more than enough. The infrastructure of the village cannot cope with more. 16 houses equals 32 cars as there is not enough public transport for residence to either Glasgow or Stirling to not have to have a car. The entrance to the site would be just about at the narrowest part of Main Street, which is already very congested.

Could the school cope? I doubt it if there were even just one child per household.
5 Placemaking - What sites should be considered for development? >> 5.11 Drymen >> 5.11.1

**Drymen Question 1: Do you agree with the preferred Options 1 and 2? Why**

**Customer Reference:** 00110  
**Customer Name:** Isobel Martin  
**Comment Reference:** LDP01/MIR/CONS/00110/1/001  
**Comment Method:** OLDP  
**Customer Type:** Individual Resident

**Verbatim Comment:**
MIR62 should not be used for housing this is not a suitable view for a visitor experience of the national park entrance to drymen. It remains to be proved that the number of houses in the project are necessary. 3 +years down the line from the granting of permission in Gartness Road nothing has happened.
I do not agree with the proposed housing development plans for Drymen, specifically the proposal listed at MIR 62 (field next to Drymen church). Villages, by definition, are small, limited settlements which retain traditional or historic features that promote the character of the village and create the attraction which brings both visitors and new residents to the village. In my opinion, the siting of new housing at the proposed location will potentially lead to the following:

a) Detrimentally change the character, size, nature and attraction of the village at that location.

b) Overwhelm the already busy and narrow Main Street, leading to potential traffic congestion with the increased likelihood of accidents occurring.

c) Increases in population naturally lead to increases in activity, which naturally lead to increases in noise and disruption across a wider portion of the 24 hour day. This will have a detrimental effect on the quality of life currently enjoyed by residents already living in that area.

d) The limited number of local employment opportunities will be overwhelmed by the increase in village population. As most of the proposed housing will be council housing, human nature must be considered. Therefore, a rise in local unemployment has the potential to lead to a rise in local crime rates.

e) Any increase in council tenants and the subsequent deterioration of the village may lead to the relocation to other traditional villages, of residents and businesses which bring financial support and employment opportunities to Drymen.

f) New housing developments do not have the layout, design, architectural features, character nor sense of community which is built into traditional housing. Any new housing development with be inherently unattractive and unable to maintain the community support which ensures that they are maintained to the high standards of traditional housing within Drymen. In other words; they will be the eyesores of the future.

g) Visitors visit the National Park to experience life in the countryside and all it has to offer, i.e. open views across stunning landscapes, peace and tranquillity, quiet roads, traditional small villages etc. People will not travel many miles to see bland and new built homes which are no different from any that
they can see within their home towns and cities. Drymen relies heavily on tourism and the local economy will be permanently disadvantaged by new build council housing schemes.

h) Increases in housing stock will detrimentally effect the inherent value of the existing housing stock, making the traditional housing stock less attractive as investment options and ultimately devaluing the area.

i) I moved to Drymen because it is a traditional village with history, character and set within a wonderful, rural location. I will have no hesitation in moving from the village should the character, nature or size of the village significantly change. I appreciate the time that you will spend looking at my concerns and trust that you will afford them appropriate consideration.

I don’t agree with option 1, in particular the site identified for 16 new houses (MIR 62) which represents a substantial addition to the existing plans for development. Drymen’s particular character owes much to it being a small rural village, with plenty of green space within the village boundary. Land that has now been uncultivated for a number of years at the lower end of the village has improved biodiversity, with more unusual plants starting to establish themselves, including butterfly orchids. The return of red squirrels and pine martens to the area is a fantastic development that has wider possibilities in terms of bringing more eco and wildlife tourism to the area, and this would be threatened by building new homes and industrial areas.

Increasing the village population would also affect the primary school, which is already at capacity, and cause problems on the roads, particularly the narrow section of Main Street just above the church. This is supposed to be a National Park, not a place where developers can make a quick profit by building new houses for rich commuters!
I disagree with. Extra houses with exit onto road in this area would cause severe congestion on a Sunday especially as cars park here for church service and also funerals during week. The church is going to require to increase space for Cemetery, maybe not this year but in near future, it also could do with increased parking area as existing carpark is too small. Extra cars with this development will cause problems exiting onto main byepass road. If extra houses to be built here, a roundabout should be built at junction. Traffic coming from Stirling direction, is fairly fast, and cars from Glasgow direction is not exactly slow either. The Village does not require these extra houses as we have the Stirling Road site available for housing (NOT STARTED) and also area of ex Salmon Leap. This also a change of main plan for area.
**Drymen Question 1: Do you agree with the preferred Options 1 and 2? Why**

Customer Reference: 00181  
Customer Name: Maja McTavish  
Comment Reference: LDP01/MIR/CONS/00181/1/001  
Comment Method: OLDP  
Customer Type: Individual Resident  
Verbatim Comment: Preferred option 1. I agree with support to improvements to the village square. The square is the centre of the village for residents and visitors.

**Drymen Question 1: Do you agree with the preferred Options 1 and 2? Why**

Customer Reference: 00181  
Customer Name: Maja McTavish  
Comment Reference: LDP01/MIR/CONS/00181/1/007  
Comment Method: OLDP  
Customer Type: Individual Resident  
Verbatim Comment: support option 2 also.
Again Drumbeg Quarry is an ideal site for regeneration. - Again this should be sympathetic to the local community and visitor needs and a priority is ensuring that the local landscape and immediate residents are unaffected as possible.

The Salmon Leap site is ideal for residential social housing & business opportunities.
I wish to object to this proposal.

Firstly we are back to the "local needs" scenarios which are regularly put forward by Stirling Council in various guises. Has the National Park been provided by Stirling Council with figures which identify how many locals actually living in Drymen who require housing.

As has been witnessed in the past, developments of a similar nature in some villages, few if any locals required housing. The bulk of the houses being allocated to people from urban areas, some of whom are incompatible with a country village environment and contribute nothing to the village or community welfare.

Further expansion of village population increases pressure on already struggling facilities eg, primary school, medical facilities and local amenities.

What consideration will be given to future requirements of expansion of the cemetery.

That piece of ground is in its natural state providing an environment for all sorts of wildlife, whose populations are diminishing year upon year due to unnecessary building developments. It is also a pleasant natural feature enhancing the entrance to the village and blends in with the immediate and wider surrounding areas.

I trust that you will give serious consideration to my objections and to those other local people who are objecting and reject this proposed unnecessary development.
I wish to register my opposition in the strongest possible terms to the proposed development at the field just after the church at the entrance to Drymen.

Drymen is large, some would say too large, already and as I understand it the affordable housing would not necessarily go to local people.

Drymen cannot cope at the moment with the amount of parking it has which deters much needed visitors to stop here and spend their money to help local businesses. We don't need any more residents to add to that. By the way I am retired and have no links with any local business in any shape or form.

You are a national park organisation which I though would mean conservation. Why are you bent on building more housing?

Forgive me for making this brief but after the surgery debacle - which I know was nothing to do with you - when 98% of residents were vehemently opposed to a chemist being opened - am somewhat disbelieving that our voice will make any difference to the decision in any case.
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<td><strong>Drymen Question 1:</strong> Do you agree with the preferred Options 1 and 2? Why</td>
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<td>Customer Reference:</td>
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<td>Customer Name:</td>
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<tr>
<td>Organisation:</td>
<td>Rural Stirling Housing</td>
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<td>(If applicable)</td>
<td>Association</td>
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<td>Comment Method:</td>
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<tr>
<td>Customer Type:</td>
<td>Other Organisation</td>
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**Verbatim Comment:**

There is a real need for more affordable housing in Drymen. The continuing delay with the Gartness Rd site is complicating matters but we assume that this will proceed in due course. We agree with the longer term site proposed adjacent to this. In the meantime we note continuing proposals to provide some affordable housing on the proposed MIR 62 site. It seems unlikely that the longstanding Salmon Leap site will be taken forward in the foreseeable future but is of locational importance and should be retained.
5 Placemaking - What sites should be considered for development? >> 5.11 Drymen >> 5.11.1

Drymen Question 1: Do you agree with the preferred Options 1 and 2? Why

Customer Reference: 00083
Customer Name: George Johnston
Comment Reference: LDP01/MIR/CONS/00083/1/001
Comment Method: OLDP
Customer Type: Individual Resident

Site MR62 the field north of the church is in the Drymen Conservation Area and as such the site character should be conserved.

Clearly it should not be considered for high density housing as this will ruin the aspect of the southern approach to the Village and effectively rejoin the village to the A811. In addition the parking associated with high density development of this site will mean that road developments will be required to give sufficient parking for new residents and visitors unless they park on the main road which at church time is already very congested. The necessary road developments may require to be major changes to the road system which could be very detrimental to the village. Until such road issues are fully worked out, it seems irresponsible that the Park Authority should even consider this site for such high density use.
I strongly object to the above-mentioned proposal for 16/18 units on the site immediately next to the church for two main reasons. The first is that this development seems to go against the ethos of Drymen being in a conservation area. The development would take away the character of the entrance to the village.

Secondly, the village also falls under the auspices of the National Park and this development contradicts their own report which states that "new housing should be constrained, particularly to lower east, west and southern sides if local character and village identity are to be safeguarded".
A number of sites included in the Placemaking section of the MIR concern us as they either contain or are adjacent to ancient woodland and others contain, or are in proximity to, other woodland/wooded sites. These are listed in the attached table with reasons for our concern.

We OBJECT to the following sites being identified for further development since this will lead to the loss of ancient woodland and damage to ancient woodland.

We consider that these site allocations should not be taken forward unless the protection of the adjacent woodland can be guaranteed and therefore request that where the allocations are taken forward, sufficient buffering between the proposed development and woodland should be identified in planning policy at the appropriate stage.

We recommend that if any protected species are present on the development site or adjacent to the development site that the appropriate survey work is carried out to determine the impacts that the development may have on the populations.

ST12 Drymen - Ancient woodland adjacent to the site. (ATTACHED TABLE APPENDED)

Please see Appendix 6 for further information
Drymen Question 1: Do you agree with the preferred Options 1 and 2? Why

Option 1 is the our preferred choice, the currently the old salmon leap is getting a eyesore and we believe a small controlled housing should be allowed
The Drymen Community Trust (DCDT Enterprise Company) welcome the opportunity to comment on the Main Issues Report as part of the LLTNPA Local Development Plan Consultation. We have been happy to contribute throughout the consultation process and make the following comments based on our role as the community development charity of the village.

Option 1 - preferred

Support improvements to village square - identify as a Placemaking Priority - This is a key priority for the Trust as we are the custodians of this asset for the community. We very much welcome the importance placed upon the improvement of the square within the report and look forward to working closely with the Park Authority over the years ahead to bring this ambition to reality.
5 Placemaking - What sites should be considered for development? >> 5.11 Drymen >> 5.11.1

Drymen Question 1: Do you agree with the preferred Options 1 and 2? Why

Customer Reference: 00159
Customer Name: DCDT Enterprise Company
Comment Reference: LDP01/MIR/CONS/00159/1/005
Comment Method: OLDP
Customer Type: Local Public Body

Verbatim Comment:
Identify additional housing site on land north of the cemetery for 16 homes (MIR 62) - The development of this site has not featured within the priorities for the Trust to date other than to be identified as a potential site for additional parking. The scale, design, and density of the development must take into consideration the characteristics of the surrounding area and the impact development would have on traffic movements within the village. The Trust would like to echo any comments made by the Community Council in relation to this proposed development.

5 Placemaking - What sites should be considered for development? >> 5.11 Drymen >> 5.11.1

Drymen Question 1: Do you agree with the preferred Options 1 and 2? Why

Customer Reference: 00159
Customer Name: DCDT Enterprise Company
Comment Reference: LDP01/MIR/CONS/00159/1/004
Comment Method: OLDP
Customer Type: Local Public Body

Verbatim Comment:
Continue to identify Drumbeg Quarry, to support its regeneration - This is not a site which the Trust has a particular view however we welcome it being highlighted as a potential site for tourism development should development occur on the site as this will only add to Drymen’s role as a tourism hub for the area bringing with it jobs and economic advantages for the wider community.
5 Placemaking - What sites should be considered for development? >> 5.11 Drymen >> 5.11.1

Drymen Question 1: Do you agree with the preferred Options 1 and 2? Why

Customer Reference: 00159
Customer Name: DCDT Enterprise Company
Organisation: DCDT Enterprise Company
Comment Reference: LDP01/MIR/CONS/00159/1/003
Comment Method: OLDP
Customer Type: Local Public Body

Redevelopment of Salmon Leap site (H17 & EDS) - In line with our remit to support local development and increase access to affordable housing we again welcome the importance placed upon the development of this prominent site within the community. This has featured very high on all community consultation exercises carried out to date and should be the primary focus for redevelopment within the community.
RA2 - I strongly feel that proposed business / industry development in this site is wrong for the following reasons:

a) tourism is the industry which keeps the businesses in Drymen going and I don't think industrial development will enhance the visitors' experience; in fact it may well keep them away, with subsequent fallout for existing businesses;
b) the road at this point does not lend itself to additional traffic turning off and I can foresee an increase in traffic accidents;
c) previously, (before the road surface was improved,) this was something of an accident black spot, with cars being regularly having to be recovered from the field;
d) it would detract from the picturesque entrance to the Buchanan Castle estate; and

e) the land lies fairly close to the river and I would worry about the potential to cause pollution.
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<td>Customer Reference:</td>
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<tr>
<td>Customer Name:</td>
<td>Morag White</td>
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<td>Customer Type:</td>
<td>Individual Resident</td>
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Drymen Question 1: Do you agree with the preferred Options 1 and 2? Why

Verbatim Comment:

4 H16 & T7 - Gartness Road is the access road for the many walkers who trek the West Highland Way and I feel that it is important that we make our village as attractive for our visitors as we can. 36 houses sounds an awful lot for this smallish area and I have reservations regarding this proposal. It is vital to keep the balance of our village and I fear that this will tip it out of kilter.

5. ST12 - The view from the top end of this site is just stunning and again is a major attraction for walkers as it borders the West Highland Way. I have reservations regarding development here.
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.11 Drymen >> 5.11.1

Drymen Question 1: Do you agree with the preferred Options 1 and 2? Why

Customer Reference: 00160
Customer Name: Morag White
Comment Reference: LDP01/MIR/CONS/00160/1/003
Comment Method: OLDP
Organisation: (If applicable)
Customer Type: Individual Resident

Verbatim Comment:
3. H17 & EDS - I would support sympathetic development of this site.
5 Placemaking - What sites should be considered for development? >> 5.11 Drymen >> 5.11.1

**Drymen Question 1: Do you agree with the preferred Options 1 and 2? Why**

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**Comment Method:** EMAIL

**Customer Reference:** 00200

**Customer Name:** Mactaggart And Mickel

**Comment Reference:** LDP01/MIR/CONS/00200/1/001

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**Verbatim Comment:**

Option 1 Preferred

We support the retention of housing site h16 & t7 for a residential and car park development.

With regards to option 2 we would also like to advise that the allocation of this additional site will support / facilitate the existing allocation h16 & t7. Planning permission was recently renewed for this site by our client, Mactaggart & Mickel. If the longer term site is supported as a residential opportunity site as well through the proposed plan it will allow for an earlier programme delivery of the existing allocation.

Our client would be pleased to present further details on this in advance of the proposed plan being published.

Option 2 longer term

We also support the longer term option for the future housing development at the eastern approach of Drymen on the south side of Stirling Road. In our view this longer term option should be promoted through the proposed plan to ensure there is a generous supply of housing land in Drymen for the plan period. This site can be split into two distinct phases, the first phase adjacent to the existing Stirling road housing allocation delivering circa 30 units.

As considered above the national park should be ensuring there is a generous supply of housing land in accordance with the new spp. As stated the site to the south of Stirling Road can provide a minimum of 30 units as a first phase and contribute to the housing land supply in the plan period.

By including this site in the proposed plan as a residential opportunity it will allow a more flexible housing land supply to come forward in Drymen. It is evident through the MIR consultation process that the site is considered suitable for housing development and it would therefore be prudent to promote it now rather than waiting for other sites to come forward.
Chapter Commented on:  5 Placemaking - What sites should be considered for development? >> 5.11 Drymen >> 5.11.2

Drymen Question 2: Do you have any other alternative options for the future of Drymen?

Customer Reference:  00095
Customer Name:  John Archer
Comment Reference:  LDP01/MIR/CONS/00095/1/001

Verbatim Comment:
The Salmon Leap site, The Gartness Road/Stirling Road site, certainly not the site north of the cemetery. The village were very involved in consultation on 2013-2018 Community Action Plan which made village priorities very clear. This site and the number of houses is all new, and presented with a short time for further consultation. The substantial problem with this proposal is the high density nature of the development. This is not a suitable development site for 16 homes.

My substantive problems with the proposal are as follows:

PROCESS: This is a dramatic change to all previous plans, developed through consultation with the community through the Community Council and the Drymen Community Development Enterprise Trust. The idea of building a few houses on the site next to the churchyard was mentioned briefly towards the end of last year’s charette meetings, but it doesn’t reflect opinion in the village. At the time the suggestion was for less than a handful of houses. Now it is for 16.

PRIORITIES: This is out of sync with village priorities. We all put a lot of effort into the Community Action Plan 2013-2018 - developed through participatory democratic process by the Community with the National Park. It appears to have been in vain, because apart from the importance of the development of the Square, everything else has been ignored. The relevant parts come in Theme 4: "Housing Development and Local Economy"

Priority 1 Develop Vacant Sites - Look at options for community ownership of garage site on square. Encourage and promote redevelopment of Salmon Leap site.

Priority 2 Affordable Housing - Work with NPA and others to ensure any new housing development includes provision for affordable housing."

POLICY: Developing the field next to the cemetery is contrary to the National Parks own policy: your Landscape Capacity Report 2009 says "Given the particular sensitivity of the area, the local plan’s housing allocations in Drymen". must be appropriately located and positively contribute to the character and creative development of these settlements. and: The southern approach to Drymen is of heritage significance

CONSERVATION: The conservation appraisal sensitivity report for the area says: "Views out to the surrounding countryside make a key contribution to the character of the..."
conservation area, particularly along the open side of Main Street at the southern end. This site is at the entrance to the village most used by visitors, coming from Glasgow and heading to Loch Lomond. Building on this field would change the open aspect of the view of fields and the church, leading to a much more urban view of a modern housing development at the entrance to the village, which is completely out of character for the area. The terrain of the site, dipping steeply, makes it expensive to develop - a particularly odd choice for sustainable development.

ARCHITECTURE: The southern entrance to Drymen is within the Conservation area. The Church and the house at the other side of the site are both listed. The conservation area status is supposed to make sure that any new building preserves and enhances the character and appearance of the area. As the Park’s own planners have stated on previous occasions, the area is made up of houses set in substantial gardens. The space between buildings is regarded as an important element of the character of the Conservation area and this would be eroded by this development. Development on the edges of villages is supposed to be on gap sites, not ribbon development. A gap site is a site between two houses, not a house and a churchyard. It will make the entrance to Drymen - the main way most villagers and visitors come into the village - feel suburban.

ROAD SAFETY: 16-18 houses means about thirty extra cars pulling out of the steep site at right angles to Main Street.

NATIONAL PARK PRIORITIES The National Parks Act 2000 sets out four statutory aims for National Park. The first is to conserve and enhance the natural and cultural heritage of the area. The fourth is to support economic and social development of the areas communities. The Act says if it appears that there is a conflict between the first aim and any of the others then we must give greater weight to the first. (this is known as the Sanford Principle).

Policy NP1 Development in the National Park states: Only development proposals which contribute towards the collective achievement of the National Parks four statutory aims will be supported and planning decisions will be based on an assessment of the impact of the development on the areas special qualities. Where development proposals are likely to create conflict between the first and any of the other three statutory National Park aims the Sandford Principle will apply and greater weight will be given to the conservation and enhancement of the natural and cultural heritage of the area. Where the impacts of a proposed development on the special qualities of the Park are uncertain but there is sound evidence for believing that significant irreversible damage could occur the Precautionary Principle will be applied and such developments will be resisted.

OTHER SITES: The community action plan - and every other consultation there’s been including the National Park’s Charette - have public opinion strongly in favour of developing the Salmon Leap site - but it would seem that the planners have made no attempt to engage the owner of the site in a conversation about the possibilities of development. Stirling Council should consider the option of buying existing housing stock as it comes onto the market in the last two years five homes have sold in Drymen within the council budget for social housing.

The main reason it is not an appropriate development in the conservation area is primarily because it is high density - the number of houses. If the suggestion was for two or three houses with gardens, in keeping with the surrounding conservation area, then it would make sense. But as it stands, for 16 homes, I oppose it, as do the National Park’s own policies.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivelpark.com
5 Placemaking - What sites should be considered for development? >> 5.11 Drymen >> 5.11.2

Drymen Question 2: Do you have any other alternative options for the future of Drymen?

Customer Reference: 00097
Customer Name: Clara Glynn
Comment Reference: LDP01/MIR/CONS/00097/1/003
Comment Method: OLDP
Customer Type: Individual Resident

Verbatim Comment:
Or there is a site to the East of the village on the other side of the football field which the owner Campbell Graham had offered to the National Park for development. Although it’s not within the village boundaries in all other respects it’s a much better site. It’s flat, south facing, and it would mean there were houses on both sides of the football field which would make it more central to the community.
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.11 Drymen >> 5.11.2

Drymen Question 2: Do you have any other alternative options for the future of Drymen?

Customer Reference: 00097
Customer Name: Clara Glynn
Comment Reference: LDP01/MIR/CONS/00097/1/002

Verbatim Comment:
There are other options for increasing the stock of council housing in Drymen. The council could buy existing houses as they come on the market (in the last year three houses have been sold inside the village for less than £102,000). The planners could be more pro-active about finding a solution for the Salmon Leap site (I phoned the owner, Colin Smith and he said he’d be interested in developing it, I do understand these things are tricky but if something could be done this would be a solution that would suit everyone).
Drymen Question 2: Do you have any other alternative options for the future of Drymen?

I would have thought sites surrounding the village would be more suitably identified for the growth of Drymen but not at such a large scale that the identity of the village is lost and we become just a suburban place.

Not all green space within the village needed to be concreted over in the name of progress!
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<th>5 Placemaking - What sites should be considered for development? &gt;&gt; 5.11 Drymen &gt;&gt; 5.11.2</th>
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<td>Customer Reference:</td>
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<tr>
<td>Customer Name:</td>
<td>James Keenan</td>
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<tr>
<td>Comment Reference:</td>
<td>LDP01/MIR/CONS/00122/1/001</td>
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<td>Comment Method:</td>
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<tr>
<td>Customer Type:</td>
<td>Individual Resident</td>
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**Verbatim Comment:**
Draft Plan for Drymen: MIR 62
Against Proposal

The development proposed for this site, given the nature of surrounding properties, and the change it would make to the aspect of the village from the Main Street and the Bypass, would be totally incongruous.

Since one of your stated aims, and responsibilities, is to conserve and enhance the area, it is my view that approval should be refused.
We would like to raise an objection to plans drawn up for Drymen Ref MIR 62. Please note our following points.

The nature of the proposed development is not in character with the surrounding properties.

The main attraction of Drymen, is the ambiance from the drive into the village all the way upto the village green, this atmospheric drive would change and may even loose it’s attraction to the already diminishing repeat visitors to the area !

We already have a substantial council house estate at the top of the village to which supports a large number of council tenants, it would be more in character to extend this area, if additional council housing is required, allowing a build which would keep Drymen’s feel good factor in place for future tourists and residents to enjoy.

An additional entrance onto the road at that point may prove to be tricky to negotiate safely, especially for the potential No of vehicles that would be associated with this size of build. Parking can already be tricky on this road especially during events, Church, peak season etc. adequate parking away from the main road would have to supports this build.
Drymen Question 2: Do you have any other alternative options for the future of Drymen?

Proposed MIR62 housing at Drymen Church

I refer to the above proposal to build 16 houses at the above location.

Such a development is wholly unsuitable in a historic part of Drymen next to the 18th century church - I'm amazed such a scheme is even being considered.

Drymen is a unique village by any standard in Scotland and the conservation imperative should be safeguarded. I'm concerned for the pressure on local amenities - local school, access at church area, and our local health centre for which there's a big doubt about its future following the loss of our pharmacy.

I would therefore urge the National Park to reconsider this proposal.
We have looked at the proposed site just north of Drymen Parish Church and attended one meeting with regard to this proposal, and wish to offer the following observations:

The south side of Drymen village is a conservation area, and is unique and special. The open aspect is important, and although more housing is acceptable, we feel the high density development proposed is not appropriate. The site is also exceedingly steep and boggy at the bottom, which will cause problems for builders and future residents. In addition, because it is some distance from the centre of the village, most residents will have one (if not two) cars, adding to the traffic through the village.

The original plan for 4 houses on this site was acceptable, but 15 or more is not realistic and could threaten the community spirit of Drymen Village.

We feel there are several sites, closer to the centre of the village, that would be more appropriate for high density building, namely a) the Stirling Road site which already has permission for 36 houses, b) the Salmon Leap site which most people would like to see developed, and c) we understand there is a flat field at the east entrance to the village which the owner is willing to sell for housing.

Please reconsider your plan to develop this site.
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<td>Local Public Body</td>
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Drymen Question 2: Do you have any other alternative options for the future of Drymen?

Verbatim Comment:

- The Trust welcomes the reference that any housing development on this site should only be considered once all other identified sites have been completed. In the short term the Trust would like to highlight this site as a potential location for additional parking within the village, possibilities of a long stay / park and ride car park developed as part of a wider initiative to address parking and vehicle movement issues within the Drymen and Buchanan communities.
There have been recent proposals to develop this site before, the reasons for their failure have not changed and in fact to increase to 10 the number of houses makes the argument for not developing this site even greater.

Some of these are identified below:

Little or no access available to the site by public highway

Visual impact on the landscape is high as the filed in question is extremely visible from the main road leading to Gartmore

Higher traffic would be inevitable accessing very narrow access points and could cause serious risk of accident to horses and children who continuously use these private roads

Housing in the area is not selling well and more housing will inevitably lead to a reduction in house values which questions its viability. Demand by implication is low to reside in Gartmore."
This statement has been prepared on behalf of Mrs K Brisbane by Houghton Planning Ltd. It relates to land north west of Park Avenue, Gartmore.

It is proposed that part of the land owned by Mrs Brisbane be allocated in the Local Development Plan Proposed Plan for residential development. The relevant area is identified on the attached Site Plan, which also shows other possible improvements to the local highway network, and structural landscaping (tree planting), which would be offered in order to ensure that the land is an ‘effective’ housing site.

The Site Plan shows how an indicative development of 10, small to medium sized dwellings, can be developed along the Park Avenue frontage of the site, but this is open to further discussion, and comment, and may well change following local community engagement.

At present, Mrs Brisbane does not have a developer associated with the site, but is happy to discuss the proposals further with the Park Authority, Gartmore Community Council, and Gartmore Community Trust, in due course, as to how it can be brought forward in the best interests of the village. This could include some of the plots being made available to self-builders.

Mrs Brisbane spoke briefly to the Community Council about the potential for the site in 2013, but this was not followed-up pending the publication of the Main Issues Report (MIR).

Main Issues Report

The MIR refers to the fact that the population of the National Park is declining whilst, at the same time, the number of older people is increasing. It, therefore, anticipates a need to address this as a priority by reviewing the way that housing is currently delivered, and the extent of land that is allocated for this purpose, with a particular
emphasis on how best to deliver affordable housing, and smaller, and cheaper, open market housing.

Mrs Brisbane has no particular comments to make on this wider review of housing policy, but has borne in mind what is said in the MIR in putting forward draft proposals for her land.

In terms of Gartmore, Mrs Brisbane has also been encouraged to promote her land for development in that the Gartmore settlement statement states that there is a need to "address locally arising housing needs through appropriate small scale development on land close to the village".

The Site

The site is situated on the north eastern edge of Gartmore, taking access from Park Avenue. Park Avenue connects with Main Street, and it is accepted that this junction has compromised visibility, which will need to be considered in detail before development can progress on the site. This issue is considered further below.

Equally, it is accepted that the first part of Park Avenue is narrow, but again there is an opportunity to improve this, to an extent, as part of developing Mrs Brisbane’s land, and this is also touched upon below.

Mrs Brisbane’s land is currently used as grazing land, under an annual reviewable rental agreement. It is generally open, other than along the north eastern boundary where mature trees define the boundary, and divide it from the grounds of Gartmore House.

The site is not within the Gartmore Conservation Area, the boundary of which follows the line of Park Avenue. It does, however, lie on the edge of the grounds of the listed Gartmore House, but the trees along the north eastern edge prevent any intervisibility of the site with the setting of the main house, and its various associated listed buildings and structures, the closest of which is the burial enclosure, which lies to the north east, and beyond a thick belt of mature trees.

The site generally slopes from north west to south east, with the north western part generally level, and at above 70 metres OD, before the land falls towards a low point at about 40 metres OD. As mentioned above, only the Park Avenue frontage is shown for development.

The site itself has no cultural, historic, or archaeological, interest, as shown on PastMap. There are no biodiversity designations shown on SNH’s SiteLink. The site is outside of the SEPA defined indicative floodplain.

Effectiveness

To be appropriate as a housing allocation, a site is required to meet certain ‘effectiveness' tests, as set out in Planning Advice Note 2/2010.

In this case, the site is considered to be ‘effective’ for the following reasons.
Main Issues Report Our Live Park Comments Received

Ownership - Mrs Brisbane is willing to release the site for development.

Physical - The site is not within the indicative floodplain, or within an area known to suffer from ground instability.

The site does slope down from the north west to south east, but a stepped frontage development will allow separate housing platforms to be created with graded slopes between. This will then be screened to the rear by structural landscaping (tree planting), leaving the remainder of the land as grazing.

Vehicular access to the site itself can be taken to each individual plot from Park Avenue.

It is accepted that there will be concerns raised, as to the suitability of the Main Street/Park Avenue junction, and the width of Park Avenue. However, it is considered that these can both be improved.

The existing junction can be improved by allowing for a build out thereby improving visibility, better signage, and improving traffic calming in the village, the last of which is something suggested as a priority in the Gartmore Action Plan.

The width of Park Avenue cannot be improved for its first c. 75 metres, but thereafter Mrs Brisbane owns the land on the north eastern side, and can widen the road from this point onwards, and/or introduce passing places.

NB: It has been noted that in recent comments upon planning applications in this area, Stirling Council Roads has required passing places to be situated 150 metres apart on a minor road, which can be introduced along Park Avenue to the benefit of all existing, and potentially future, residents.

If there is an appetite for this site to be developed, Mrs Brisbane is prepared to fund a highway consultant to consider these highway improvement proposals in greater detail, for discussion with the local community thereafter.

Contamination - Review of historic plans, including those in the Gartmore Conservation Area Character Appraisal suggests that this land has either been in agricultural use, or woodland. As such, it is unlikely to be contaminated.

Marketable housing - It is considered that a mixed (private and affordable) residential development would be deliverable on the site.

Mrs Brisbane will commence discussions with potential developers, and registered social landlords, should the Park Authority, and the local community, show a willingness to support development on the site.

Infrastructure - It is thought that the site is free of infrastructure constraints, but further review will be undertaken, should the site be considered favourably.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivempark.com
Land use - New housing would seem to be the best use for the site. Not only does the MIR suggest that there is a need for new housing in the Park generally, but the settlement statement for Gartmore alludes to a need to identify appropriate small-scale development sites, and the Gartmore Action Plan has a priority action to identify areas of land for potential development for cheaper/affordable housing.

Conclusion

The MIR suggests that there is a need for appropriate small-scale housing sites on land close to Gartmore.

Mrs Brisbane owns land on the edge of the village, and is willing to explore part of that land being developed for housing, with the extent being indicatively shown on the enclosed Site Plan.

It is appreciated that developing this site has issues, principally the junction of Main Street/Park Avenue, and the width of the first part of Park Avenue, but if there is an appetite locally for the release of this site, Mrs Brisbane will fund a further technical study of the deliverability of highway improvements, and then consult locally on these.

Mrs Brisbane will also consult with the local community generally about her proposals in due course, having already approached the Community Council in 2013. (SITE PLAN ATTACHED)

Please see Appendix 10 for further information
I agree with the Main Issues Report that there is little opportunity for further development in Gartmore. There is no evidence of any significant local need for additional affordable housing and any further developments should be restricted to the existing settlement boundary.

I give further information on local need and suitable sites below:

a) Local Need

One argument in favour of additional houses in the village is the potential for the new residents to bring in more business to the community owned village shop and the local pub, as well as increasing the number of children in the village school. In my opinion the existing social rental housing in Gartmore has contributed little to the economic sustainability of the village and there has been occasional anti-social behaviour from tenants requiring the intervention of the police. A particular concern about the social housing owned by Stirling Council is the lack of any priority in the allocation policy to applicants with local connections. This has resulted in housing being allocated to people from urban areas whom have no experience of living in a small rural community and make little or no contribution to that community. The Rural Stirling Housing Association properties have a different allocation policy which does take into account local connections, but even some of these have been allocated to tenants without any local connection, suggesting that there is little local demand for affordable housing. In addition to these social rented properties, there are a very small number of privately rented properties in the village.

The majority of the housing stock is privately owned. Owners of these properties contribute to the economic viability of the village, but even their support for the village shop and school has been disappointing. Many of these owners are professional people with jobs in Stirling or Glasgow so it is more convenient, and cheaper, to stock up in a city supermarket rather than the local shop. Some parents have shown a preference for schools with a higher number of pupils and where dropping off and collecting may be done on the way to and from work. Properties coming onto the market in recent years have not sold particular quickly. Currently there are 7 houses on the market with sale prices from £150,000 to £695,000. The three cheapest properties have been on the market for some time with little or no interest from prospective buyers. Unfortunately in the last few years some sales at the lower end of the price spectrum have been as second (holiday) homes which make little contribution to the local economy. I therefore conclude that there is no significant demand for more houses to meet local need at the present time. However, research is needed to establish the...
true level of local need now and in the future. Only if this ever demonstrates that there is significant local demand for housing would I support a further small scale housing development. This should have a mixture of affordable (both rented and shared ownership) and private housing. Until such time any further development should be restricted to the existing settlement boundary.

b) Sites suitable for development in the event of an increase in local need

The National Park's Site Assessment Report reviewed two sites submitted under the call for sites process (MIR 69 and 70). They were rejected on the basis of visual prominence, landscape sensitivity and access. There would be strong local opposition to the use of either site and no further consideration of development on these sites should be made. The same issues would apply to other sites close to the settlement boundary which were not considered in the report. Within the current settlement boundary there are two undeveloped sites, one of which is large enough for several houses. The existing Rural Stirling Housing Association site in Jellicoe Avenue might be extended parallel to the Back Lane. This would have less visual prominence than other sites but residents with properties in the Main Street backing onto the Back Lane may object. Gartmore was originally developed as a linear village so it would be more in keeping to extend the village by ribbon development along the access roads. This would have the least visual and landscape issues and minimal effect on existing residents. It is not know if the landowners of any of the above sites would consider development on their land. IN CONCLUSION: There is no evidence of any significant local need for additional affordable housing and any further developments should be restricted to the existing settlement boundary.
5 Placemaking - What sites should be considered for development? >> 5.12 Gartmore >> 5.12.1

Gartmore Question 1: Do you agree with the above issues and opportunities? Why?

Yes I agree. The landscape setting and rural, open and elevated (on highland boundary fault with open views to highlands from one side of village and lowlands from the other side of the village) views from within the village are very important to the character and quality of the village. If development is absolutely required then it should not close in any of these outstanding views from within the village and not change the feeling you get of openness as you walk along the back lane or hang out in Play Park etc. This to me is critical.

On page 107 of the MIR document it says 'support small scale housing adjacent to settlement boundary, where access is possible'. I do not agree with this. Sites that fit this could block in Gartmore from the wider landscape giving walks along the back lane for example a far more urban feel. This would be ruining what makes Gartmore unique and I could never agree to this. I far prefer the last statement in the opportunities for Gartmore which specifies 'on land close to the village' as then locations could be found which do not further spoil the original historic linear form of the village with its tremendous views all round (the community action plans mention the 360 degree views as more or less the top attribute of the village for residents).

Please do not allow the beautiful walks within the village to be further spoiled by insensitive and short sighted development which blocks the far reaching views that all residents and visitors can freely enjoy.

The National Park should be much stricter with regard to the built heritage and should really insist on historically correct features when people want to make changes to their house. This has been very disappointing.
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.12 Gartmore >> 5.12.2

Gartmore Question 2: Do you have any alternative options for the future of Gartmore?

Customer Reference: 00183
Customer Name: Gartmore Community Council
Comment Reference: LDP01/MIR/CONS/00183/1/001
Comment Method: OLDP
Customer Type: Local Public Organisation

Verbatim Comment:

Q1: ISSUES: We agree that there are very limited development opportunities in Gartmore, if the village and landscape appearance are to be maintained. We do not think any of the very few gaps available lend themselves to development.

OPPORTUNITIES: Maintaining and enhancing the built heritage, with the Grant Scheme, is a positive move. However, clarity on qualification is necessary to ensure all applicants are clear about the conditions.

Additional housing to meet local needs is an area of interest to the Community Council. We would support initiatives if there was evidence that there was genuine local need and suitable sites identified. We believe that a survey to find out if there is need for housing should be carried out.

Q2: We object to the exclusion of Gartmore from the areas with small scale tourist potential on the map on P16 of the Main Issues Report on the following grounds:
- Gartmore is on the National Cycle Network (Route 7)
- It has two significant sized camping and caravan sites within the Community Council boundary
- Gartmore House serves as a Conference and Activity Centre
- Several local properties offering Bed and Breakfast or self catering accommodation
- The local Black Bull hotel offers food and accommodation, and we have a community owned Village Shop
- The refurbishment of the Village Hall is now complete and appears to be attracting more business to the village. We believe that there is excellent potential for increasing the economic benefit to all of these businesses and the village in general by promoting and supporting further tourism.

Access to high speed broadband would be essential to all of the above businesses, which the National Park Authority could, and should, lobby for more effectively.

Free WiFi hot spots in key locations across the Park would also be very beneficial to tourists and locals alike.

We believe that the National Park could help by better signage to promote local amenities in Gartmore as the majority of tourists head straight for Aberfoyle on the A81.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivelpark.com
A local map could also be produced to include local walks, the NTS owned Cunninghame Graham Memorial and information on local facilities.

Mobile phone reception is poor and the National Park should be active in encouraging operators to develop more roaming, in areas where only one provider is available. You should also consider more shared provider masts in the Park.

We have a reasonable bus service to Stirling but a poor one to Glasgow. We believe The National Park should work closely with operators to improve connection times. This, with the other initiatives of DRT and Loch Katrine/Loch Lomond water connections, could enhance public transport in the Park as a viable option. The National Park should try to secure funding to develop summer services across the Park.

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.13 Gartocharn

Customer Reference: 00107
Customer Name: Non Attributable
Comment Reference: LDP01/MIR/CONS/00107/1/002
Organisation: (If applicable)
Comment Method: ONLINE
Customer Type: Information not available

Verbatim Comment:
While the site identified is less sensitive than the others it has a major problem in that it is on the wrong side of this dangerous road. The field behind the Millennium Hall car park would have been a better choice as it is in the village centre and residents would not have to cross a major road for all amenities and school etc.
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**Verbatim Comment:**

Field to rear of Gartmore Primary School

Flooding as a result of snowmelt reported in 1925 and 1932.

A small watercourse may be culverted through the site. Consideration should be given to PAN 69 which states that "buildings must not be constructed over an existing drain (including field drain) that is to remain active". We recommend that this is investigated before development is consented.

remove from plan: No
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.13 Gartocharn

Customer Reference: 00187
Customer Name:
Organisation: SEPA
(If applicable)
Comment Reference: LDP01/MIR/CONS/00187/4/023
Comment Method: EMAIL
Customer Type: Key Agency

Verbatim Comment:
Land rear to Gartocharn church

We would have no objection to the allocation of this site on flood risk grounds.

Remove from plan: No
### 5 Placemaking - What sites should be considered for development? >> 5.13 Gartocharn

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Verbatim Comment:
France Farm (local plan site H18)

No flood risk apparent.

Foul Drainage comments: There may be capacity issues.
5 Placemaking - What sites should be considered for development? >> 5.13 Gartocharn

Burnbrae Farm, Gartocharn (Field No 13)
A minor watercourse runs through this site, this poses a potential risk of flooding. A basic FRA will be required either prior to, or in conjunction with any planning application. This will need to define the areas at risk of flooding, the relative vulnerability of the proposed use and confirm design layout and levels. We would be likely to object to the development of this site unless appropriate additional information is submitted / the site plan is amended to remove the sections thought to be at risk.
Remove from site: No

Burnbrae Farm, Gartocharn (Field No 6)
We would have no objection to the allocation of this site on flood risk grounds.
Remove from plan: no

Burnbrae Farm, Gartocharn (Field No 8) half of site preferred MIR 73 b, 73a not preferred site
A minor watercourse runs through this site, this poses a potential risk of flooding. A basic FRA will be required either prior to, or in conjunction with any planning application. This will need to define the areas at risk of flooding, the relative vulnerability of the proposed use and confirms design layout and levels. We would be likely to object to the development of this site unless appropriate additional information is submitted / the site plan is amended to remove the sections thought to be at risk.
Remove from plan: No

Burnbrae Farm, Gartocharn (Field No 9)
We would have no objection to the allocation of this site on flood risk grounds.
Remove from plan: No
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.13 Gartocharn

Customer Reference: 00193
Customer Name: Gavin MacLellan
Comment Reference: LDP01/MIR/CONS/00193/1/001
Comment Method: EMAIL
Customer Type: Individual Resident

Verbatim Comment:
Development should be focused to the south/east side of the A811.

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.13 Gartocharn

Customer Reference: 00209
Customer Name: Scottish Campaign for National Parks
Comment Reference: LDP01/MIR/CONS/00209/1/015
Comment Method: EMAIL
Customer Type: Other Organisation

Verbatim Comment:
Site MIR73b would perpetuate the linear development of the village on what is already a busy road. The France Farm site is preferable.
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.13 Gartocharn

Customer Reference: 00126
Customer Name: Iain Methven
Comment Reference: LDP01/MIR/CONS/00126/1/001
Organisation: (If applicable)
Comment Method: EMAIL
Customer Type: Individual Resident

Verbatim Comment:
By the time all new roads, new roundabouts, street lights, pavements, services and all associated external site costs such as roads and pavements upgrades to meet "Safe routes to school “routes are established how financially viable would this site actually be? If the site is not financially viable why would the owner choose to actually deliver what you plan is proposing?
If the NPA is actually serious about actually delivering (not just talking about delivering) affordable housing in Gartocharn, then the proposal made in relation to Site MIR 76 guarantees, without any doubt, within a time scale 100% controlled by the NPA, the actual delivery of the affordable housing that the NPA continues to say they want and need, yet continuously fails to deliver.

One additional comment I would make is: regardless of what site the NPA allocates for new housing in Gartocharn, the landowner needs not only to be willing to gift the area of land for the affordable housing away free of charge, but is also required to pay a large contribution towards the costs of all new roads and infrastructures costs (internal of site) plus external site costs such as safe routes to schools roads, street lighting and pavement upgrades, as well as potential electricity supply infrastructure upgrade costs, new roundabouts etc. These costs, for a small development, even split 50/50 with a social landlord, can easily result in the site owners having to pay out hundreds of thousands of pounds in advance, prior to any development taking place on their land. This is in addition to the landowner also having to gift the area of land for affordable housing away free of charge. I would recommend a "means test" of all the landowners who are saying they are willing to promote their land for the delivery of affordable housing by way of a capability assessment to include the following criteria plus others:

- Landowners who formally acknowledge that in addition to giving their land for free, they will be expected to contribute a large percentage to the roads and services costs both internal of the site plus external as described above, which could easily be hundreds of thousands of pounds just for their share, depending on site specifics.

- Landowners who actually have (not just say they have in a letter) the financial capability to make the required contribution to the roads and services costs. This could be done via a robust, confidential capability assessment requiring actual evidence to substantiate each land owner’s true position.

If the two criteria above are not met and sufficed by the landowner, how can the sites deliver the affordable housing the new local plan is being designed to provide?
Gartocharn Question 1: Do you agree with the preferred option? Why?

MIR Question(s): Q1. Yes, we agree with Option 1, the preferred option. This allows for a realistic number of units on a favourable new site that can realistically be developed, while retaining an existing suitable site at the same time, providing flexibility.
Economic Development Site (ED6)
The road depot was mentioned as a site for development in the last LL&TNP five year plan. At that time it was occupied by Transerve. Prior to Transerve it was occupied by Bear. Following the Plan it was taken up again by Bear when they won the next contract.

The Plan says there has been no take up of the currently identified (ED6) economic development site and this land is being used for the forseeable future as a roads depot. It has been a roads depot for more than 14 years and has never provided the opportunity for small business development.

About 20 years ago A&B Services, heavy machinery work, situated in the centre of the village asked Stirling Council if they could move to that area and, following a positive feasibility study, were turned down with the result that they remain inappropriately situated in the centre of the village with an access that is difficult for wood lorries and other articulated trucks to access without damage to the road surface.

This year, PFK Performance, a car repair and servicing workshop, expressed its need to expand. It has been unable to find an area suitable. It was turned down by planning on another plot available to the owner as it would be too noisy for nearby housing. It is already adjacent to housing. It sought to move to the area near to the bus turning circle and expressed an interest in developing the public toilets in the new building at no cost to Stirling Concil or the community.

The only land available to PFK was some of the land owned by Stitt Bros., builders, other than the land identified for economic development. PFK was unable to obtain appropriate land for industrial development and is now expected to move to Callander taking with it a facility much used by the village along with an engineer and two apprentices who will commute on a 44 round trip to work.

The Killin and Ardeonaig Community Development Trust attempted to identify an area suitable for economic development following the 2006 Community Development Plan and was only able to identify an area outside the LL&TNP in Glen Lochay which Stirling Council said could have been used for industrial development next to the electricity development. We were not in a position to follow that up at the time.
Main Issues Report Our Live Park Comments Received

MIR 80
The Rural Activity Area at Acharn is one that has been considered by the community as a possibility but it is not within easy walking distance and is over a mile from the village.

Summary

Killin was a small rural industrial location when it had five water-powered mills for flour, wool and linen. Those locations have been taken over by housing and a restaurant with the exception of the Old Mill on the Dochart. While the community needs an economic development site the site by the bus turning circle is not available for new development.

The small triangular section adjacent to the north of Station Road and south west of the car park is still being treated for Japanese Knotweed and not yet available for development.

Four Houses at Lyon Road (H29)
These are almost completed so that capacity has been taken up.

In view of this it would be reasonable to alter the piece about Killin to take account of the current situation.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivelpark.com
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.14 Killin

Customer Reference: 00187
Customer Name: 
Organisation: SEPA (If applicable)
Comment Reference: LDP01/MIR/CONS/00187/4/020
Comment Method: EMAIL
Customer Type: Key Agency

Verbatim Comment:
Ambulance Station Main Street / Lyon Road Killin FK 21 8UH

N/a

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.14 Killin

Customer Reference: 00209
Customer Name: 
Organisation: Scottish Campaign for National Parks (If applicable)
Comment Reference: LDP01/MIR/CONS/00209/1/016
Comment Method: EMAIL
Customer Type: Other Organisation

Verbatim Comment:
We support the Preferred Option but clearly the closure of the Visitor Centre is hardly the way to encourage tourism and improve the visitor experience.
Stirling Council provided a coach parking and bus turning circle at the Station Rd development site. It is assumed that the proposed redevelopment around the site intends to retain the bus and coach facilities. If it does not, the proposed redevelopment of the station road depot site would only be supported if an alternative coach and bus facility could be provided.

In considering the MIR, the Stirling Council Planning Service has focussed on the settlements in close proximity to the planning authority boundary which are most likely to have impacts on the area. In terms of settlement specific proposals for Aberfoyle, Croftamie, Drymen and Killin we have no particular concerns, provided infrastructure constraints required for development are addressed.
<table>
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<tr>
<th>Chapter Commented on:</th>
<th>5 Placemaking - What sites should be considered for development? &gt;&gt; 5.14 Killin &gt;&gt; 5.14.1</th>
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<tr>
<td>Killin Question 1: Do you agree with the preferred option? Why?</td>
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<tr>
<td>Customer Reference:</td>
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<td>Comment Method:</td>
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<tr>
<td>Organisation:</td>
<td>Tacran (If applicable)</td>
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<tr>
<td>Customer Type:</td>
<td>Public Body</td>
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<tr>
<td>Verbatim Comment:</td>
<td>It is noted that for Killin a key opportunity exits around the Station Road depot which could accommodate a range of uses including parking. It is essential that provision for buses is retained at this location, in line with Killin’s status as a strategic interchange in the Regional Buses Strategy and Action Plan.</td>
</tr>
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<tr>
<th>Chapter Commented on:</th>
<th>5 Placemaking - What sites should be considered for development? &gt;&gt; 5.14 Killin &gt;&gt; 5.14.1</th>
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<td>Customer Reference:</td>
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<td>Comment Reference:</td>
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<tr>
<td>Comment Method:</td>
<td>EMAIL</td>
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<tr>
<td>Organisation:</td>
<td>Rural Stirling Housing Association (If applicable)</td>
</tr>
<tr>
<td>Customer Type:</td>
<td>Other Organisation</td>
</tr>
<tr>
<td>Verbatim Comment:</td>
<td>We agree that there is no pressing need for more affordable housing for rent in Killin in the coming five year period although there may be demand for some low cost home ownership locally and this should be explored.</td>
</tr>
</tbody>
</table>

*If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com*
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.14 Killin >> 5.14.1

Killin Question 1: Do you agree with the preferred option? Why?

Customer Reference: 00148
Customer Name: 
Organisation: Woodland Trust Scotland
Comment Reference: LDP01/MIR/CONS/00148/1/017
Comment Method: EMAIL
Customer Type: Other

Verbatim Comment:
A number of sites included in the Placemaking section of the MIR concern us as they either contain or are adjacent to ancient woodland and others contain, or are in proximity to, other woodland/wooded sites. These are listed in the attached table with reasons for our concern.

We OBJECT to the following sites being identified for further development since this will lead to the loss of ancient woodland and damage to ancient woodland.

We consider that these site allocations should not be taken forward unless the protection of the adjacent woodland can be guaranteed and therefore request that where the allocations are taken forward, sufficient buffering between the proposed development and woodland should be identified in planning policy at the appropriate stage.

We recommend that if any protected species are present on the development site or adjacent to the development site that the appropriate survey work is carried out to determine the impacts that the development may have on the populations.

MIR 80 Killin - Ancient woodland adjacent to site.

Please see Appendix 6 for further information

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
5 Placemaking - What sites should be considered for development? >> 5.15 Kilmun, Strone & Blairmore

Page Number, 114, Kilmun, Strone, Blairmore; As Stated In Your Issues, There Is No Scottish Water Mains Infrastructure Therefore, Consideration Of A Private Treatment Solution For Any Leisure And Or Housing Accommodation Would Be The Most Practicable Solution.
5 Placemaking - What sites should be considered for development? >> 5.15 Kilmun, Strone & Blairmore

MIR 27
A minor watercourse runs through this site and another one runs along the site boundary, these pose a potential risk of flooding. A basic FRA will be required either prior to, or in conjunction with any planning application. This will need to define the areas at risk of flooding, the relative vulnerability of the proposed use and confirm design layout and levels. We would be likely to object to the development of this site unless appropriate additional information is submitted / the site plan is amended to remove the sections thought to be at risk.

MIR 28
A minor watercourse runs through this site and another one runs along the site boundary, these pose a potential risk of flooding. A basic FRA will be required either prior to, or in conjunction with any planning application. This will need to define the areas at risk of flooding, the relative vulnerability of the proposed use and confirm design layout and levels.

MIR 29
A minor watercourse runs along the northern edge of this site, this poses a potential risk of flooding. A basic FRA will be required either prior to, or in conjunction with any planning application. This will need to define the areas at risk of flooding, the relative vulnerability of the proposed use and confirm design layout and levels. We would be likely to object to the development of this site unless appropriate additional information is submitted / the site plan is amended to remove the sections thought to be at risk.
Sites 23 housing units have been identified but none developed. This must raise the issue of whether housing on this scale can be justified even if it was restricted to local needs/affordable.
I saw an article on the BBC Scotland news on Friday informing people that they still have time to comment and put forward suggestions and ideas for the National Park.

I live in Strone and I am concerned about the lack of resources and investment that has been put into our village. We have a small pier that is beginning to fall into disrepair and really needs to have some money spent on it before it becomes a lost cause.

I have been told the pier is privately owned, I would still hope that the Park authorities could still do something in conjunction with the pier owner to make the necessary repairs to ensure the pier remains in a useable condition for future generations.

The pier is regularly used by fishermen and people often walk the pier to admire the fantastic views from the end. I walk the pier nearly every day with our two dogs.

The only business we have in Strone is a Pub (Strone Inn) and a small shop / Post Office.

Anything that would improve the amenity would be welcome and may do something to attract people to linger longer and spend some money locally.

It would be terribly sad to see this pier being closed and possibly being lost completely.
Kilmun, Strone and Blairmore Question 1: Do you agree with the preferred option? Why?

Q1:
It is interesting that all three village piers are specifically highlighted as all are in private ownership (as opposed to the lack of inclusion of Loch Lomond piers). We are aware that Blairmore Pier was rebuilt some years ago and is visited once a week in July & August by the Waverley, and by Munro's vessels. We understand that the owner of Strone pier will not allow Waverley to call; and as Western Ferries own Kilmun pier and use it to berth their spare vessel, access may be an issue.
A number of sites included in the Placemaking section of the MIR concern us as they either contain or are adjacent to ancient woodland and others contain, or are in proximity to, other woodland/wooded sites. These are listed in the attached table with reasons for our concern.

We OBJECT to the following sites being identified for further development since this will lead to the loss of ancient woodland and damage to ancient woodland.

We consider that these site allocations should not be taken forward unless the protection of the adjacent woodland can be guaranteed and therefore request that where the allocations are taken forward, sufficient buffering between the proposed development and woodland should be identified in planning policy at the appropriate stage.

We recommend that if any protected species are present on the development site or adjacent to the development site that the appropriate survey work is carried out to determine the impacts that the development may have on the populations.

H21 Kilmun, Strone and Blairmore - Within the ancient woodland

Please see Appendix 6 for further information
FRA requested by Planning Authority as part of planning application 2009/0245/PPP based on review of the decision notice. We did not object to 2009/0245/PPP.

We would require a FRA for the site in order to assess the risk of flooding from the Ogle Burn. A small watercourse appears to be culverted through the site and as such this should be considered within the FRA. Consideration should be given to PAN 69 which states that "buildings must not be constructed over an existing drain (including field drain) that is to remain active".

remove from plan: No
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.16 Lochearnhead

Customer Reference: 00187
Customer Name: (If applicable)
Comment Reference: LDP01/MIR/CONS/00187/4/018
Comment Method: EMAIL
Customer Type: Key Agency
Organisation: SEPA

Verbatim Comment:
Lochearnhead holiday centre (local plan site H23)
Commented on CAR license which addressed Flood Risk issues. Culvert realigned.
FRA not required as flood risk was addressed through the CAR licence application process.
remove from plan: No
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.16 Lochearnhead

Customer Reference: 00187

Customer Name:

Comment Reference: LDP01/MIR/CONS/00187/4/017

Organisation: SEPA

Comment Method: EMAIL

Customer Type: Key Agency

Verbatim Comment:
Auchraw Terrace East Lochearnhead FK19 8PU

Flooding has been reported in 1990, 1993, 1997 and 2004.

We would require a FRA for the site in order to assess the risk of flooding from the Ogle Burn and Loch Earn. A small un-named watercourse enters a culvert north of the site and it is unknown whether the culvert is routed through the site. This should be investigated as part of the FRA. Consideration should be given to PAN 69 which states that "buildings must not be constructed over an existing drain (including a field drain) that is to remain active". The site is currently used as a car park therefore the planning authority should confirm the land status as this has been contradicted between sites within the Local Plan. We would view this as a change of use to a more vulnerable use. We would highlight that the provision of a FRA may only support that this site is not suitable for further development.

Remove from plan: No
Main Issues Report Our Live Park Comments Received

5 Placemaking - What sites should be considered for development? >> 5.16 Lochearnhead

Customer Reference: 00213
Customer Name:
Organisation: Stirling Council
Comment Reference: LDP01/MIR/CONS/00213/1/011
Comment Method: EMAIL
Customer Type: Local Government

Verbatim Comment:
Safe and convenient pedestrian and cycle access to local facilities requires the crossing of a trunk road. The ability to provide safe and convenient pedestrian and cycle access across the trunk road should be taken into account in the consideration of development.

National walking and cycle routes - as set out in National Planning Framework 3 - would bring similar issues (e.g. crossing of a trunk road) and opportunities as at other settlements where this is referenced (e.g. Strathyre, Tyndrum)

5 Placemaking - What sites should be considered for development? >> 5.16 Lochearnhead

Customer Reference: 00218
Customer Name:
Organisation: Rural Stirling Housing Association
Comment Reference: LDP01/MIR/CONS/00218/1/016
Comment Method: EMAIL
Customer Type: Other Organisation

Verbatim Comment:
We do not feel that there is a pressing need for more affordable housing in Lochearnhead at this time.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.17 Lochgoilhead

Customer Reference: 00187

Customer Name: 

Organisation: SEPA (If applicable)

Comment Reference: LDP01/MIR/CONS/00187/4/016

Comment Method: EMAIL

Customer Type: Key Agency

Verbatim Comment:
Land north east of Donich Park (local plan site H24)

No flood risk apparent.

remove from plan: No
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.17 Lochgoilhead

Customer Reference: 00107
Customer Name: Non Attributable
Comment Reference: LDP01/MIR/CONS/00107/1/060
Comment Method: ONLINE
Customer Type: Information not available

Verbatim Comment:
"Lochgoilhead needs attention.

I see key issues being the lack of a food shop in the village centre. The post office is a life line but cannot stock a sufficient range of food to sustain a healthy diet.

The loch is popular for water sports yet continues to be the outlet for domestic raw sewage.

The un-adopted Inverlounin Road is managed well by the road committee but it's long term viability is a concern.

The management of the hillside above Inverlounin road impacts on the houses below in terms of drainage, risk of landslides and fire.

Uncertainty about power supplies in the winter, either from power cuts or from interruptions in fuel deliveries as roads become impassible in bad weather make it a hostile environment for elderly residents."
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<th>Chapter Commented on:</th>
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<td>ONLINE</td>
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<tr>
<td>Customer Type:</td>
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Verbatim Comment:

"I have tried unsuccessfully to get a response from the National Park or any of the other bodies on this matter.

We live in a beautiful area but from late April until early October caravans hog the laybys near Inverbeg so passing tourists can not enjoy the views."
"Luss seriously needs, in no particular order: Improved signage to guide tourists, parking laws that are enforced, housing for families, camping ban. Management of the approx. 750,000 tourists that visit each year is virtually non-existent and considering how much revenue this little village and its occupants bring to the park, is it asking too much that visitors experiences are not only improved, but the lives of it inhabitants relieved of the stresses of having so many people descend on a village of about 60 houses. Luss was not built for this volume of traffic or visitors, so it is high time that the park allowed the villagers to manage people coming to see it. Parking in the village is not only a nightmare for residents, but each summer, emergency services cannot attend call-outs as their appliances get stuck in the village due to the crazy parking of visitors. Do we need to wait for someone to die before something is done about this?

Considering the Loch Lomond Lifeboat is based here, I find it ridiculous that parking laws are neglected and unenforced. An absolute fortune could be made from parking fines alone. National Park, please do something for this side of the Loch!"
5 Placemaking - What sites should be considered for development? >> 5.18 Luss

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<tr>
<th>Customer Reference:</th>
<th>00187</th>
<th>Organisation:</th>
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<td>Key Agency</td>
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Verbatim Comment:
MIR 95 New car park near or off Pier Road

This site consists of two parts, part 1 is a long site on the old old road (centered 2358703 692733) and the other is in a meander in the river (235959 6926010). This site is located entirely within the fluvial floodplain. Provided that this proposed use can be realised without the need for landraising or other works which would adversely impact flood storage at this location we would not object to this allocation. Clear information in this regard would need to be supplied with any subsequent planning application. If the proposal did include landraising or other works which compromised flood storage we would object in principle to the proposal. We reiterate that as this site is within the functional floodplain, as such there will be a potential risk to users, and flooding will result in damage and associated clean-up costs.

Remove from Plan: Yes

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Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.18 Luss

Customer Reference: 00187
Customer Name: SEPA
Comment Reference: LDP01/MIR/CONS/00187/4/014
Comment Method: EMAIL
Customer Type: Key Agency

Verbatim Comment:
Land to north of Loch Lomond Arms Hotel (H25)

A minor partly culverted watercourse runs through this site. This poses a potential risk of flooding. We would be likely to object to the development of this site unless appropriate additional information is submitted / the site plan is amended to remove the sections thought to be at risk. A basic FRA will be required either prior to, or in conjunction with any planning application. This will need to define the areas at risk of flooding, the relative vulnerability of the proposed use and appropriate detailed design layout and levels.

water environment developer site requirements and comments: Buffer strip required. There is a culverted burn nearby which has a small section open, opportunities to open up more should be looked at. This should not be closed for land gain.
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<th>Chapter Commented on:</th>
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<td>Verbatim Comment:</td>
<td>MIR 94 Land north of Primary School</td>
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<td>Remove from plan:</td>
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We would have no objection to the allocation of this site on flood risk grounds.
5 Placemaking - What sites should be considered for development? >> 5.18 Luss

Customer Reference: 00187
Customer Name: 
Organisation: SEPA
(If applicable)
Comment Reference: LDP01/MIR/CONS/00187/4/012
Comment Method: EMAIL
Customer Type: Key Agency

Verbatim Comment:
Land north of Hawthorn Cottage

Part of this site is shown as being at fluvial flood risk on the IRCFM(S). Loch Lomond poses a potential risk of flooding, a minor watercourse also runs alongside the edge of the site. A FRA will be required either prior to, or in conjunction with any planning application. This will need to define the areas at risk of flooding, the relative vulnerability of the proposed use and confirm design layout and levels. We would be likely to object to the development of this site unless appropriate additional information is submitted / the site plan is amended to remove the sections thought to be at risk.

Remove from plan: No

If you feel any information in this report is incorrect please contact us by email at hello@ourlivempark.com
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.18 Luss

Customer Reference: 00187
Customer Name:
Organisation: SEPA
(If applicable)
Comment Reference: LDP01/MIR/CONS/00187/4/011
Comment Method: EMAIL
Customer Type: Key Agency

Verbatim Comment:
Former petrol station site

We would have no objection to the allocation of this site on flood risk grounds.

Remove from plan: No
5 Placemaking - What sites should be considered for development? >> 5.18 Luss

Customer Reference: 00198
Customer Name:
Comment Reference: LDP01/MIR/CONS/00198/1/001
Comment Method: EMAIL
Customer Type: Other Individual

Verbatim Comment:
I lived in Luss, and found the view of the loch was being filled in by TREE’S. It was not an over-night thing. I OWNED a property facing onto the Luss highland games field.

I lost a fortune on my property.

I tried in vain to make a go of my cottage.

I served in the RAF and just wanted a peaceful life.

Yes, younger families are needed in and around Luss.
Chapter Commented on:  5 Placemaking - What sites should be considered for development? >> 5.18 Luss

Customer Reference:  00209
Customer Name:  Scottish Campaign for National Parks
Comment Reference:  LDP01/MIR/CONS/00209/1/018
Verbatim Comment:
Luss has outstanding conservation area status and any new development must have regard to this in terms of layout and design quality. In this context, what is intended in terms of a proposed village square? We also question the case for MIR92 which seems remote from the village. Is this intended for local needs/affordable housing?

Chapter Commented on:  5 Placemaking - What sites should be considered for development? >> 5.18 Luss >> 5.18.2

Customer Reference:  00113
Customer Name:  Luss Estates Company
Comment Reference:  LDP01/MIR/CONS/00113/1/028
Verbatim Comment:
Luss Question 2: Do you have any other alternative options for the future of Luss?

Please see Appendix 7 for further information

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
Luss Question 1: Do you agree with the Vision for Luss? Why?

Luss Estates agrees with the preferred option - it is supported by the Luss Strategic Development Framework, which was itself widely consulted upon and supported.

We would add the following sites that have been missed from the Main Issues Report

1. Aldochlay development - 2 infill family houses
2. Slate Quays - 2 / 3 executive style family house
3. Muirlands - up to 8 infill family houses
4. Arnburn Road - a new in fill proposal of up to 4 family houses
5. Port O'Rosstdhu - a new infill proposal of up to 4 family houses
6. Luss carpark site - a new infill proposal, owned by the National Park, suitable for up to 6 affordable house plots (called H6)
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.19 St Fillans

Customer Reference: 00187
Customer Name: SEPA
Comment Reference: LDP01/MIR/CONS/00187/4/010
Comment Method: EMAIL
Customer Type: Key Agency

Verbatim Comment:
Station Road, Land West of Kiloran (Currently H27 IN Adopted Local Plan)

SEPA hydrologists visited the site in 2008 to ensure that the Struie Burn would not flood the site. The IRCFM is erroneous in this area most likely as a result of an error in the DTM therefore we do not believe that the site is at risk of flooding from the River Earn. The site is at the bottom of a steep slope therefore there may be a risk of flooding from surface water runoff. We recommend that appropriate mitigation measures are implemented to reduce the risk of flooding from this source.

Remove from plan: No
SEPA hydrologists visited the site in 2008 to ensure that the Struie Burn would not flood the site. The IRCFM is erroneous in this area most likely as a result of an error in the DTM therefore we do not believe that the site is at risk of flooding from the River Earn. The site is at the bottom of a steep slope therefore there may be a risk of flooding from surface water runoff. We recommend that appropriate mitigation measures are implemented to reduce the risk of flooding from this source.

remove from plan: no

Is there really a case for 16 housing units (Site H27) and are they general or local needs/affordable?
Perth and Kinross Council welcomes the opportunity for early engagement with the Loch Lomond & The Trossachs National Park Authority’s Main Issues Report. Development in the National Park LDP area has the potential to have both positive and negative impacts on Perth and Kinross, in the vicinity of St Fillans.

The Main Issues Report raises no significant issues - we welcome ongoing engagement in the process.

**St Fillans Question 1: Do you agree with the preferred option? Why?**

Drummond Estates continue to fully support the retention of the site H27 in the Local Development Plan as it forms a natural progression for the wider residential development allocation. (APPENDIX LOCATION MAP)

Please see appendix 7g for further information
 whilst supporting the retention of the H27 site allocation, Drummond Estates would also wish to see an amendment to the settlement boundary which has been drawn tightly and thereby limits the potential for any other small scale infill opportunity or windfall development to take place.

We consider that infill sites within or at the edge of existing settlements can make an important contribution to the supply of housing land particularly where proposals can respect the scale, form and density of the surroundings and enhance the character and amenity of the community.

In this regard we consider that the area of ground lying to the north of the ‘A frames’ at The Girron, Station Road should be included within a revised settlement boundary which aligns with the National Park boundary along this northern edge of St Fillans.

Development already exists within this general area as confirmed by the fact that the Conservation Area boundary already includes the existing property at Sunnybrae which should also be included within a revised settlement boundary.

A revised settlement boundary in this location to reflect the National Park boundary would therefore be entirely appropriate. Any development within this area would have little visual impact on the existing settlement or the wider area but would potentially allow other small scale (possibly individual plots) to be developed (which would offer an alternative from the single identified housing site H27). Allowing appropriate infill development within this site would also support the National Park’s fourth aim of promoting the sustainable social development of the area’s communities and make a positive contribution to the local development plan’s overall housing land requirement.

This area of land is unobtrusive and can be easily serviced. The design of any development would be able to take advantage of the sloping nature of the land and could be designed to take full account of the National Park’s Sustainable Design guidance as well as being able to incorporate small scale renewable energy features. In addition we note that there are opportunities to capitalise on path network improvements to the north of St Fillans. Allowing this site to be included within an extended settlement boundary would allow a development proposal to contribute to the National Park’s objectives of path network improvements in this area. (APPENDIX LOCATION MAP)
Safe and convenient pedestrian and cycle access to local facilities requires the crossing of a trunk road. The ability to provide safe and convenient pedestrian and cycle access across the trunk road should be taken into account in the consideration of development.
Flooding occurred in December 2006. Aerial photographs illustrate flooding of part of the site however it is unknown when the photographs were taken in regards to the peak of the flood.

The site is adjacent to the River Balvag and the Tighanes Burn. We cannot support development of this site due to the location of the site within the Indicative River and Coastal Flood Map (IRCFM) and the additional information we hold which demonstrates that the site has flooded historically. Development of this site would not only be at risk itself but would increase the risk elsewhere.

Request for site to be removed from plan: Yes
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.20 Strathyre

Customer Reference: 00187
Customer Name: 
Organisation: SEPA
(If applicable)

Comment Reference: LDP01/MIR/CONS/00187/4/075
Comment Method: EMAIL
Customer Type: Key Agency

Verbatim Comment:
Land at Keep Road Strathyre FK18 8NQ

Flooding occurred in December 2006. Aerial photographs illustrate flooding of part of the site however it is unknown when the photographs were taken in regards to the peak of the flood.

We would require a FRA for the site in order to assess the risk of flooding from the small un-named watercourse which is located through the site and the River Balvag. The site is at the bottom of a steep slope therefore there may be a risk of flooding from surface water runoff. We recommend that appropriate mitigation measures are implemented to reduce the risk of flooding from this source and should be considered within the FRA. Development will be constricted on this site.
5 Placemaking - What sites should be considered for development? >> 5.20 Strathyre

Flooding occurred in December 2006. Aerial photographs illustrate flooding adjacent to the site however it is unknown when the photographs were taken in regards to the peak of the flood.

We would require a FRA for the site in order to assess the risk of flooding from the small un-named watercourse which is located through the site and the River Balvag. Consideration should be given to upstream/downstream culverts and structures which may exacerbate flood risk. Consideration should be given to PAN 69 which states that "buildings must not be constructed over an existing drain (including field drain) this is to remain active". The site is at the bottom of a steep slope therefore there may be a risk of flooding from surface water runoff. We recommend that appropriate mitigation measures are implemented to reduce the risk of flooding from this source and should be considered within the FRA. Development will be constricted on this site.
### Strathyre Question 1: Do you agree with the Issues and Opportunities above? Why?

**Comment Reference:** LDP01/MIR/CONS/00218/1/017  
**Comment Method:** EMAIL  
**Customer Reference:** 00218  
**Customer Name:**  
**Organisation:** Rural Stirling Housing Association  
**Customer Type:** Other Organisation  

**Verbatim Comment:**  
No new sites are proposed but there are some that might be viable and we will be carrying out some investigations into these.

---

### Tarbet

**Chapter Commented on:** 5 Placemaking - What sites should be considered for development? >> 5.21 Tarbet

**Customer Reference:** 00037  
**Customer Name:**  
**Organisation:** Arrochar & Tarbet Community Council  
**Customer Type:** Local Public Body  

**Comment Reference:** LDP01/MIR/CONS/00037/1/006  
**Comment Method:** EMAIL  

**Verbatim Comment:**  
MIR106b. The CC agrees with 10 housing units being built in keeping with the rural setting.
5 Placemaking - What sites should be considered for development? >> 5.21 Tarbet

As I live in the National Park I was surprised to find out about the Park feedback system on the BBC evening news a couple of days ago. It would have been nice to have been informed about the National Park consultation beforehand as decisions made by the Park authority could affect me.

Since Loch Lomond and the Trossachs became a National Park there has been an increase in popularity to the area. However, this also seems to have brought an increase of litter particularly in laybys along the side of Loch Lomond and the islands of Loch Lomond. I love being outdoors, camping and participating in outdoor pursuits and am not against others taking part in the same activities but I think the issue of litter needs to be addressed in these areas. A National Park is stereotyped as a place of beauty and not a place strewn with rubbish, discarded tents and barbecues. Preventing or charging for wild camping isn’t the answer. Restrictions on wild camping would impact on locals and those who respect the environment and clean up after themselves the most. I suggest that wild camping in the laybys particularly on the stretch of A82 between Balloch and Tarbet (because this isn’t wild camping) especially since there are campsites at Balloch, Luss, Arrochar and Ardlui.

I heard about the suggestion to build a village square in Arrochar on the news. Again this was the first I had heard about it. I don't think a village square would encourage people to visit Arrochar and don't know if it would actually be beneficial to locals. The 3 Villages Hall was built in Arrochar a few years ago now. Locals fundraised so that the hall could be built. The same locals also have to pay to use the hall with some local clubs finding it quite expensive. Locals weren’t initially allowed to work in the hall the jobs had been reserved for people outwith the village - I don’t know if this has now changed. Locals volunteer their time to run the hall. I think before any decisions are made about a village square locals need to be consulted properly and it would definitely need to be beneficial including financially beneficial to locals to the village.

I do not agree to a housing estate being built on the corner of the beginning of the A83 opposite the Tarbet Hotel and Ballyhennan Crescent. It would take away the views for numerous locals and also remove habitat for the wildlife that lives there including the great spotted woodpeckers, jays and crows that nest there. A national park is meant to preserve wildlife and the beauty of the area. People live in a village because it is small, quiet and beautiful so is it really beneficial to locals to keep building, expanding and developing?

I love kayaking, canoeing and going out in our RIB. Unfortunately I don’t often have the opportunity to do these activities on Loch Lomond very often even though it is pretty much on my doorstep. As a local I think it is unfair to have to pay £50 to take a RIB on the Loch as it is expensive. As a result we have not taken our RIB out on Loch

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Main Issues Report Our Live Park Comments Received

Lomond since this charge was introduced. It is also difficult to take kayaks down to the Loch as all the gates are padlocked so it is difficult to get access. We have to go round on to the grass which would be okay if we didn't have to negotiate dog poo. If the Park really values the locals then I think locals should be exempt from the annual boat charge and also other charges such as car parking charges. Charging just makes it difficult for locals to get out and about and take advantage of the beautiful area we live in. Charges accumulate particularly for locals living in the area.

I think the cycle way along Loch Lomond is a great idea. It could be maintained on a more regular basis though (undergrowth cut back and holes filled in) and not just when there are events on in the area. It would be a good idea to put up notices to let people know who stop in the car parks that the pavement area is a cycle way and not somewhere that people sitting in their deck chairs and blocking the path. There is one layby where cyclists are supposed to get off and walk between Firkin and Inverbeg. I suggest that a pavement is put in along this layby and then the route is continuous (you don't need to get off your bike) between Tarbet and Luss.

I think that the roundabout with the concrete pillars and geese templates at the entrance to the National Park at Balloch isn't money well spent. Money could be better spent in area such as litter management and conservation. I haven't personally met a local that likes it and when friends have visited they have asks questions such as 'What is that piece of junk meant to be at the roundabout at Balloch?' Flowers, trees and shrubbery like the roundabout as you enter Balloch would have been much more appropriate for the roundabout than the structure that is currently there. It is simple, cheaper and is natural which is what a National Park is supposed to be.

I love the wallabies on Inch Connachan and have been visiting them since I was young and enjoyed taking friends to visit them too. They have been there for around 70yrs and haven't caused any damage to the island and the natural wildlife that lives there. The locals love them, it is a novelty to the tourists. The capercaillie live on a different island - if they wanted to be there they wouldn't keep flying away - so the wallabies don't disturb them. The wallabies don't disturb the Ospreys - you could argue that they aren't native either as they migrate to breed here. I would say that dogs that are allowed off their leads on the islands and people leaving litter are causing more damage. Please please do not cull the wallabies.

I am running out of time to write more so I will say that if Local views are really important to the Park then they should be sought and well informed and actually used. Locals should be encouraged to get out and about in the park.

Is this really anonymous if I have to give my name and e-mail?
"I can't say that I am happy about the new site proposal of 10 housing units so near to our home. The reason we chose to live here is because it is a small and quiet community with lovely views.

The proposed site for housing development has great spotted woodpeckers nesting in the trees in the spring - they are such a pleasure to watch and are frequent visitors to the bird feeders of ours and other local gardens.

10 units seems too many for a housing development so near to the busy A82/A83 junction which is already a danger spot. A few houses similar to those opposite, facing the main road and without the need for an access road would be more fitting for a village like Tarbet with the main A83 diverted round the back taking away the dangerous corner. Careful thought would need to be given to ensure business to the Tarbet Tearoom wasn't unduly affected if the road was diverted. The piece of land in question isn't the most attractive pieces of land especially nearer to the corner by the tearoom so 2 or 3 cottages may actually improve it.

I feel to have a housing estate however small will alter the community and may not be for the best.

Ballyhennan Crescent residents own and maintain the piece of land in front of their houses and would not be happy if residents of a new estate were to wander across to walk their dogs etc. and this would be likely to happen.

If any housing were to go ahead I hope that they are of the same stone and design of the houses nearby so that they fit in well.

Whilst I agree that something needs to be done to improve the junction of the A82/A83 and the wild piece of land behind and around the information centre put to better use I am not convinced that 10 housing units is the best way forward."

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.21 Tarbet

Customer Reference: 00187
Customer Name: 
Comment Reference: LDP01/MIR/CONS/00187/4/008
Comment Method: EMAIL
Organisation: SEPA
Customer Type: Key Agency

Verbatim Comment:
Lochside frontage from Harvey’s garage site (local plan site ST17)

We would require a FRA for the site in order to assess the risk of flooding from Loch Lomond and the minor watercourse that flows through the site. We recommend that appropriate mitigation measures are implemented to reduce the risk of flooding from this source and should be considered within the FRA. Development will be constricted on this site.

remove from plan: No

FRA undertaken by Scotia Water Services, 2007 could potentially be used to help inform floodplain and developable area
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.21 Tarbet

Customer Reference: 00187
Customer Name: (If applicable)
Comment Reference: LDP01/MIR/CONS/00187/4/007
Comment Method: EMAIL
Customer Type: Key Agency

Verbatim Comment:
Former Harvey's garage site (local plan site ST16)

We would require a FRA for the site in order to assess the risk of flooding from Loch Lomond. We recommend that appropriate mitigation measures are implemented to reduce the risk of flooding from this source and should be considered within the FRA. Development will be constricted on this site.

remove from plan: No

FRA undertaken by Scotia Water Services, 2007 could potentially be used to help inform floodplain and developable area

Water Environment comments: Sites currently have morphology pressures, there could be the opportunity for restoration that could reduce existing pressures.
Central green area south east of Tarbet hotel (local plan site ST15)

A minor watercourse runs along northern boundary of this site. This poses a potential risk of flooding. We would be likely to object to the development of this site unless appropriate additional information is submitted / the site plan is amended to remove the sections thought to be at risk. A basic FRA will be required either prior to, or in conjunction with any planning application. This will need to define the areas at risk of flooding, the relative vulnerability of the proposed use and appropriate detailed design layout and levels.

Remove from plan: No
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**Verbatim Comment:**
Tourist information centre and adjoining land (local plan site ST14)

A minor watercourse runs along northern boundary of this site. This poses a potential risk of flooding. We would be likely to object to the development of this site unless appropriate additional information is submitted / the site plan is amended to remove the sections thought to be at risk. A basic FRA will be required either prior to, or in conjunction with any planning application. This will need to define the areas at risk of flooding, the relative vulnerability of the proposed use and appropriate detailed design layout and levels.
5 Placemaking - What sites should be considered for development? >> 5.21 Tarbet

Land to the rear of the Tarbet Hotel (Currently ST18 in Adopted Local Plan)

A minor watercourse runs in close proximity to the northern edge of this site, this poses a potential risk of flooding. A basic FRA will be required either prior to, or in conjunction with any planning application. This will need to define the areas at risk of flooding, the relative vulnerability of the proposed use and appropriate detailed design layout and levels. It is possible that the difference in level between the site and bankfall and bed level will be such to demonstrate that site is not at risk. We would be likely to object to the development of this site unless appropriate additional information is submitted / the site plan is amended to remove the sections thought to be at risk.

remove from Plan: No
SCNP supports the preparation of a masterplan for Tarbet but questions the site MIR106b which seems very large for 10 housing units. Again, is the intention for local needs/affordable?

Tarbet: Site MIR106b is indicated as a new site proposal for housing. This site is bounded by the A83 (T) on its north and east sides, with no adjacent local roads. There is no indication within the MIR as to how this site will be accessed. Transport Scotland would require to be consulted on any proposals for this site. It is noted that there is a longer term option to explore the management of the A83 road through Tarbet and encourage the preparation of a Masterplan for the village. Transport Scotland would support this approach, and would welcome early consultation on any proposals which may affect the A83 Trunk Road in this location.
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<td>Customer Type:</td>
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Verbatim Comment:

Land at Tarbet Yard
This is a split site. Several minor watercourses runs through this site, these pose a potential risk of flooding. A basic FRA will be required either prior to, or in conjunction with any planning application. This will need to define the areas at risk of flooding, the relative vulnerability of the proposed use and confirms design layout and levels. We would be likely to object to the development of this site unless appropriate additional information is submitted / the site plan is amended to remove the sections thought to be at risk.

Remove from Plan: No
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.21 Tarbet >> 5.21.1

Tarbet Question 1: Do you agree with the preferred and long term options? Why?

Customer Reference: 00037
Customer Name: Arrochar & Tarbet Community Council
Comment Reference: LDP01/MIR/CONS/00037/1/004
Comment Method: EMAIL
Customer Type: Local Public Body

Verbatim Comment:
Q1. NP. Do you agree with the long term options?

CC: Some concerns.

Preferred Options

Our reply to this question in the local Plan (March 10) is as follows:

ST14 the planning for this site will impinge seriously on the retail business in Arrochar & Tarbet. The fragility of sustain small retail businesses and employment (especially in uncertain financial climate) cannot be ignored. We hoped that the retail opportunities will remain small-scale in the Park in keeping with supporting local community needs.

ST15 Should be retained solely for recreation and tourism. ST16 The original planning application should be strictly adhered to. There was no mention of food / drink when the CC submitted their observations. ST17 This area should be left clear of tourism. NP plans would incorporate the local Primary School frontage also run through the sewage pumping station serving the villages of Arrochar & Tarbet.

ST18 no comments as this is privately owned property.
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<td>Tarbet Question 1: Do you agree with the preferred and long term options? Why?</td>
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<td>Customer Reference:</td>
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<td>Customer Name:</td>
<td>Luss Estates Agree</td>
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<td>Comment Reference:</td>
<td>LDP01/MIR/CONS/00113/1/029</td>
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<td>Comment Method:</td>
<td>OLDP</td>
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<td>Customer Type:</td>
<td>Private Business</td>
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Verbatim Comment:
Luss Estates agrees with the preferred option.

We would suggest that the site MIR106B is extended west to opposite the entrance of Ballyhennan Crescent, to allow for maximum flexibility for site specific details, and also to allow for a suitably large number of houses to be built to good economies of scale.
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.21 Tarbet >> 5.21.2

Tarbet Question 2: Do you have any other alternative options for the future of Tarbet?

Customer Reference: 00037
Organisation: Arrochar & Tarbet Community Council
Comment Reference: LDP01/MIR/CONS/00037/1/005
Comment Method: EMAIL

Customer Name:
Comment Reference: LDP01/MIR/CONS/00037/1/005
Comment Method: EMAIL

Verbatim Comment:
Q2.NP: Do you have any other alternative options for Tarbet?

CC: The CC agree a masterplan is needed for Tarbet especially with the plans for the A82 and A83, but unless developers are willing to involve the community at an early stage in their planning process the CC feel that the local input is missed.

Additional observation - It is noted that the National Park have no vision for Ardlui the third village within the Arrochar & Tarbet Community Council’s area of responsibility.

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<td>Customer Reference:</td>
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<tr>
<td>Customer Name:</td>
<td>Loch Lomond Steamship Company</td>
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**Tarbet Question 2: Do you have any other alternative options for the future of Tarbet?**

Tarbet pier appears to be excluded from any preferred site. We recommend the pier be included within the masterplan placemaking priorities as this is a key feature for water transport, and could link well with the option of increasing links to the train station.
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.22 Tyndrum

Customer Reference: 00187

Customer Name: (If applicable)

Comment Reference: LDP01/MIR/CONS/00187/4/002

Comment Method: EMAIL

Comment Reference: LDP01/MIR/CONS/00187/4/002

Customer Type: Key Agency

Verbatim Comment:
H29/ED8 Clifton, Tyndrum
A minor watercourse runs along the eastern edge of this site, this poses a potential risk of flooding. We would be likely to object to the development of this site unless appropriate additional information is submitted / the site plan is amended to remove the sections thought to be at risk. A basic FRA will be required either prior to, or in conjunction with any planning application. This will need to define the areas at risk of flooding, the relative vulnerability of the proposed use and appropriate detailed design layout and levels.

Remove from Plan: No

If you feel any information in this report is incorrect please contact us by email at hello@ourlivpark.com
### 5 Placemaking - What sites should be considered for development? >> 5.22 Tyndrum

**Customer Reference:** 00187  
**Organisation:** SEPA  
**(If applicable)**  
**Customer Name:**  
**Comment Reference:** LDP01/MIR/CONS/00187/4/001  
**Comment Method:** EMAIL  
**Customer Type:** Key Agency

**Verbatim Comment:**
MIR 113 Mansfield, Tyndrum  
A minor watercourse runs along the eastern edge of this site, this poses a potential risk of flooding. We would be likely to object to the development of this site unless appropriate additional information is submitted / the site plan is amended to remove the sections thought to be at risk. A basic FRA will be required either prior to, or in conjunction with any planning application. This will need to define the areas at risk of flooding, the relative vulnerability of the proposed use and appropriate detailed design layout and levels.

Remove from Plan: No
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Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.22 Tyndrum

Customer Reference: 00209
Customer Name: Scottish Campaign for National Parks
Comment Reference: LDP01/MIR/CONS/00209/1/021
Comment Method: EMAIL
Customer Type: Other Organisation

Verbatim Comment:
The way things have developed since planning consent was granted for the proposed goldmine illustrates what a high risk strategy has been adopted in placing reliance on potential benefits from this proposal.

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.22 Tyndrum

Customer Reference: 00214
Customer Name: Transport Scotland
Comment Reference: LDP01/MIR/CONS/00214/1/009
Comment Method: EMAIL
Customer Type: Public Body

Verbatim Comment:
Tyndrum: The MIR indicates that the trunk road is inhospitable to pedestrians which discourages people from visiting the village. The preferred option includes proposals to establish a key initiative to support improvements to the public realm, including the footway along the A82(T) and a safe crossing on the A82(T). Transport Scotland would welcome early consultation on any proposals which may affect the A82 Trunk Road in this location.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
5 Placemaking - What sites should be considered for development? >> 5.22 Tyndrum

Verbatim Comment:
Safe and convenient pedestrian and cycle access to local facilities requires the crossing of a trunk road. The ability to provide safe and convenient pedestrian and cycle access across the trunk road should be taken into account in the consideration of development.

5 Placemaking - What sites should be considered for development? >> 5.22 Tyndrum >> 5.22.1

Tyndrum Question 1: Do you agree with the preferred option? Why?

Verbatim Comment:
At this stage we do not feel that there is a need for more affordable housing here.
Chapter Commented on: 6 List of Consultation Questions >> 6.1 Chapter 2: National Park Partnership Plan - Vision for the Park

Vision Question 1: Do you agree with the Vision?

We found the ER clear and well written and are satisfied that an adequate assessment of the plans sites and policies has been undertaken. We welcome the summary of the results of the assessment. It is noted that the assessment has taken into account our site assessment and has recognised that appropriate mitigation measures will be required to mitigate flood risk.

Please note, this response is in regard only to the adequacy and accuracy of the ER and any comments we may have on the plan itself will be provided separately.

As the plan is finalised, Loch Lomond and the Trossachs National Park Authority as Responsible Authority, will be required to take account of the findings of the Environmental Report and of views expressed upon it during this consultation period. As soon as reasonably practical after the adoption of the plan, the Responsible Authority should publish a statement setting out how this has occurred. We normally expect this to be in the form of an "SEA Statement" similar to that advocated in the Scottish Government Guidance available at: www.scotland.gov.uk/Publications/2013/08/3355. A copy of the SEA statement should be sent to the Consultation Authorities via the Scottish Government SEA Gateway on publication.
Chapter Commented on: 6 List of Consultation Questions >> 6.1 Chapter 2: National Park Partnership Plan - Vision for the Park >> 6.1.1

Vision Question 1: Do you agree with the Vision?

Customer Reference: 00093
Customer Name: Scottish Natural Heritage
Comment Reference: LDP01/MIR/CONS/00093/1/001
Comment Method: OLDP
Customer Type: Public Body

Verbatim Comment:
Yes it places conservation and enhancement of the natural heritage along with sustainability amongst the key priorities for the park and its future development.

Chapter Commented on: 6 List of Consultation Questions >> 6.2 Chapter 4: Identifying the Main Issues - what needs major change and what are the options?

Drivers for Change Question 1: Do you agree with summary outlined? Is there anything we have missed?

Customer Reference: 00093
Customer Name: Scottish Natural Heritage
Comment Reference: LDP01/MIR/CONS/00093/1/002
Comment Method: OLDP
Customer Type: Public Body

Verbatim Comment:
Re: Is there anything we have missed?

No, however we would recommend reference is made in the Plan itself to the step change required to halt biodiversity decline, as outlined in ‘the 2020 Challenge for Scotland’s Biodiversity’. Within the infrastructure and services and sustainability sections of the plan the focus of new active travel routes will be important considerations for some of the larger developments.
Comment 5: in light of the marine (Scotland) act and the requirement for marine planning, it will be important for the LDP to consider whether additional policy direction will be needed in relation to the marine environment. In particular, it will be useful to consider any terrestrial implications of offshore development that there might be need for policy on. This could include a policy that protects terrestrial interests from the onshore components of offshore development (such as grid connection infrastructure), for example, or from coastal erosion that could result from changed coastal processes as a result of offshore development.

Comment 6: it will be important to ensure that the LDP includes an appropriate policy framework to address the national long distance cycling and walking network identified as a new national development in the National Planning Framework 3. A number of the new and improved routes and links for walking and cycling that are identified as part of the national development run through the park.

Comment 7: please note that in addition to the above comments directly related to the MIR as presented, we have also provided a review of the policies of the adopted local plan and the ways in which we consider they could be amended as part of the plan review process. We consider it important to include this in our response at this stage given the approach taken in the MIR of reviewing only the key areas of change as main issues, but also because we consider it more helpful and meaningful to provide these comments now as opposed to at the proposed plan stage, when there is less scope to influence the drafting of policies etc.; we trust that this approach is acceptable to you, and the review is attached to the covering email.

Please see Appendix 3 for further information.
Drivers for Change Question 1: Do you agree with summary outlined? Is there anything we have missed?

Customer Reference: 00115
Customer Name: Anne-Michelle Ketteridge
Comment Reference: LDP01/MIR/CONS/00115/1/006
Organisation: (If applicable)
Comment Method: OLDP
Customer Type: Individual Resident

Verbatim Comment:
No comment

Drivers for Change Question 1: Do you agree with summary outlined? Is there anything we have missed?

Customer Reference: 00045
Customer Name: Kilmaronock Community Council
Comment Reference: LDP01/MIR/CONS/00045/1/005
Organisation: (If applicable) Council
Comment Method: EMAIL
Customer Type: Local Public Body

Verbatim Comment:
Development of derelict or abandoned farm or other buildings. Suggestion that consideration be given to a new policy that requires or at least encourages owners of such property to utilise to improve the landscape, and/or provide for potential tourism or housing usage.

Farmland. More land is becoming ‘set aside‘ or covered in reeds/rushes. Suggestion that policies be considered that can improve on this and also encourage effective vermin control.

Community Empowerment Bill. How will this relate to the NP planning if at all?
Drivers for Change Question 1: Do you agree with summary outlined? Is there anything we have missed?

Customer Reference: 00188
Customer Name: Sportscotland
Customer Type: Public Body
Comment Reference: LDP01/MIR/CONS/00188/1/012
Comment Method: EMAIL

Verbatim Comment:
Comment 3: we note that a number of sites/broad indications of development are identified in the MIR. We have not endeavoured to identify whether these include outdoor sports facilities at this stage, but we would seek to highlight to the planning authority the provisions of Scottish planning policy paragraph 226 with regard to the loss of outdoor sports facilities, and also the circumstances as set out in the development management regulations under which sportscotland should be consulted on planning applications affecting these. In our attached policy review we have recommended that policy ENV29 from the adopted plan be retained in relation to this.

Please see Appendix 3 for further information
Drivers for Change Question 1: Do you agree with summary outlined? Is there anything we have missed?

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Comment Reference: LDP01/MIR/CONS/00188/1/011

6. Comments on section 4.1 Environment - Minerals

6.1 We support the advice of paragraph 235 of SPP that the planning system should secure the sustainable restoration of sites to beneficial after-use after working has ceased rather than simply restoring land to its previous state. Sport and recreation can form a particularly suitable and positive after-use for former mineral extraction and potentially surface coal mining sites. Such sites often have features (or the potential to develop them) such as cliffs, gradients, water bodies and track networks, which are attractive for sporting activities; such land can be of lower nature conservation value, allowing for easier integration of sport and recreation activities; and mineral or surface mining sites can be in locations, or of a nature, where noise from sport (e.g. motor sport) is more acceptable.
5. Comments on section 4.2 Sustainable Communities - Renewable Energy

5.1 Paragraph 169 of SPP states that impacts on recreation should be taken into consideration in relation to energy infrastructure developments. Policy REN1 should make specific reference to the need for wind renewable proposals not to impact negatively on sport and recreation interests. In relation to run of river hydro schemes covered in policy REN2, sportscotland requests that criterion (g) is retained; run of river schemes can have a significant impact on water levels and flow rates in rivers which in turn can impact significantly on angling, canoeing, rafting and other sport and recreation interests. sportscotland was involved in an appeal hearing against the refusal by SEPA of a water use licence for a run of river hydro scheme. Ministers upheld SEPA’s decision citing impact on canoeing interests as one of the main reasons for the refusal of the licence. We would also request to be consulted on any modifications to the associated 2013 Supplementary Guidance.
Drivers for Change Question 1: Do you agree with summary outlined? Is there anything we have missed?

Verbatim Comment:

4. Comments on section 4.1 Environment - Open Space

4.1 The wording of policy ENV29 - Protecting Playing Fields and Sports Pitches was previously amended to reflect sportscotland’s comments and the SPP that was in place at the time, and we would strongly support the continuation of this Policy into the LDP, but request that it should be amended to reflect the current SPP, in particular paragraph 226. Note that the new SPP includes playing fields and pitches within the wider grouping of ‘outdoor sports facilities’, which are defined as;

(a) an outdoor playing field extending to not less than 0.2ha used for any sport played on a pitch;
(b) an outdoor athletics track;
(c) a golf course;
(d) an outdoor tennis court, other than those within a private dwelling, hotel or other tourist accommodation; and
(e) an outdoor bowling green.

4.2 It should also be noted that the notification requirements to sportscotland are now contained in the Development Management Regulations 2013 (Schedule 5) - which effectively updates the reference to Circular 7/2007 contained within the ‘Reason for Policy’ section.

4.3 We also note the intention to update the Policy to take into consideration the constituent Local Authorities’ playing fields and sports pitches strategies, and we would strongly support this approach. SPP states that LDPs should identify sites for new indoor or outdoor sports, recreation or play facilities where a need has been identified in a local facility strategy, playing field strategy or similar document.

4.4 Please note that we would be happy to assist the Park in any redrafting of this Policy prior to the publication of the Proposed Plan.
Drivers for Change Question 1: Do you agree with summary outlined? Is there anything we have missed?

2.1 It is noted in the Policy List and Action Summary document that the transport policies are to be retained and reviewed, with minor changes to the wording proposed only. Therefore, it is hoped that the comments below can input to the review and modification process.

2.2 It would be useful to consider the introduction of cycle parking standards to be applied in relation to new development. This would go some way to addressing the Park’s aspirations for sustainable transport and active travel.

2.3 We are supportive of TRAN7 on outdoor access but suggest that criterion (b) be amended to state ‘the wider access network of formal and informal paths and routes’ - this takes into account important water routes for access which cannot be described as paths and will also account for things like important climbing crags which again could not be described as paths but merit policy protection under access rights.

2.4 We disagree with the reference in criterion (c) of TRAN7 to the potential impact of access rights on European protected species and Natura sites. Other policies in the plan provide full protection for protected species and Natura interests without the need for a specific reference in TRAN7. It seems unnecessary to make specific reference to the need for the protection of Natura and Protected Species specifically from access rights. This suggests that access has a particular impact on such interests. We consider it inappropriate to make a specific reference to the impact of access rights on the noted conservation interests and recommend the removal of reference to protected species and Natura from criterion (c) of the policy.

2.5 Under ‘Reason for the policy’ it is important to make specific reference to the role of access rights in providing for recreation and enjoyment. This is the primary and legislative purpose of access rights which should be explicitly expressed in the development plan. We recognise the role of access rights and routes in providing for sustainable transport but it is crucial that the role of access rights in providing for recreation is fully expressed and

2.6 therefore considered in development plan policy. The Land Reform Act states in its first paragraph that the Act establishes ‘statutory public rights of access to land for recreational and other purposes’. The Scottish Outdoor Access Code sets the context for access rights in paragraph 1.1 referring to the great opportunities for open-air
Main Issues Report Our Live Park Comments Received

recreation that access rights will provide for. It is important that this purpose is clearly reflected in development plan policy.

If you feel any information in this report is incorrect please contact us by email at hello@ourlivepark.com
3. Comments on section 4.1 Environment - Landscape

3.1 We fully agree with the points made on page 53 that the landscape provides a major setting for outdoor recreation. We also agree that how people experience and perceive the landscape contributes to its value.

3.2 We note the statement in the last paragraph on page 53 of the Local Plan that development which introduces noise may be inappropriate and the related criterion (c) of Policy L1 on safeguarding the tranquil qualities of the park.

3.3 Consistent with the comments we have made above, we are concerned by the reference to the impact that noise can have on the landscape. As stated, we accept that tranquillity is an important quality in the park but we do not consider that this means that proposals that can generate noise should be restricted over large areas of the park. It is important to recognise that there are different levels and types of noise with some more acceptable than others, that there will be different areas of the park that are more or less able to accommodate noise impacts and that noise generating developments can be effectively mitigated. Noise is not an alien feature in the countryside.

3.4 We note that criterion (c) of Policy L1 states that the tranquil qualities of the park will be safeguarded. This criterion is fine so long as it is applied on the basis of the considerations we highlight above. There is a concern, however, that the criterion could be interpreted as a blanket restriction on noise generating proposals which does not take into account the various different factors which can determine the impact of noise. On this basis it would be useful if criterion (c) could make specific reference to the different considerations that should be taken into account in assessing noise generating proposals. Alternatively, a separate policy on noise might be an approach to consider.

3.5 The approach we outline above and in our policy document ‘Out There’ (see link previously) is consistent with the approach to noise outlined in PAN 1/2011 Planning and Noise. Para 14 of the PAN states for example ‘the selection of a site, the design of a development and the conditions which may be attached to a planning permission can all play a part in preventing, controlling and mitigating the effects of noise.’ It is suggested that this approach be reflected in a revised policy L1/new policy on noise.
3.6 There is a further concern that the use of the term tranquillity may also include the restriction of proposals which involve fast, energetic and boisterous activities, in addition to their noise impacts; i.e., it might be argued that speed, vigour, energy etc. impact on the tranquil qualities of the park. It is important that developments supporting activities such as mountain biking, white water canoeing or cross country equestrianism for example, are not restricted because of a perceived impact on tranquillity.

3.7 One of the key landscape attributes that we would like to see protected is the physical qualities of the landscape. As noted in the Local Plan, the landscape provides a major setting for outdoor recreation. As well as scenic qualities, physical qualities of the landscape are integral to people’s use and enjoyment of the landscape. This relates to features like gradient, landform, geology, the presence of water etc. It is these features that allow certain activities to take place like rock climbing, white water canoeing, downhill mountain biking etc. We recognise that criterion (f) of Policy L1 already makes reference to geological and geomorphological elements of the landscape; however these are possibly referenced for their intrinsic value rather than their value for sport and recreation. We would like to see a specific reference in the policy which recognises the importance of the physical qualities of the landscape and their value in providing for a range of sport and recreation activities.

3.8 We note the reference under ‘Reason for Policy’ to the need for more assessment to take into account landscape experience. We agree with this and recommend that one of the main ways people experience landscape is through sport and recreational enjoyment of it and that as such the physical components of the landscape that facilitate recreational use and enjoyment are integral to the value people attach to the landscape. It is important that this is reflected in the policy and in the Reason for the Policy text.
Main Issues Report Our Live Park Comments Received

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<th>7 Policy List and Action Summary &gt;&gt; 7.1 Introduction &gt;&gt; 7.1.1</th>
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Drivers for Change Question 1: Do you agree with summary outlined? Is there anything we have missed?

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Verbatim Comment:
I could not see any major reference to the Historic Environment which is an important element of our local heritage. In terms of open space no reference made about the issues of local food and developing activities such as Community Allotments so we widen physical activities beyond walking and cycling.

It may be that some of the above comments are relevant at a later stage and if so it would be helpful to be advised so.
My experience with the last plan was that I did not receive any response until I attended a hearing with the Scottish Government Reporter who supported my then comments about housing provision for older people.

I hope that my comments on this occasion are considered and responded to.
Drivers for Change Question 1: Do you agree with summary outlined? Is there anything we have missed?

Verbatim Comment:
Significant updates to policies HOUS4 and ED3 are proposed to introduce greater flexibility towards appropriate development; we would highlight that where no public sewerage infrastructure exists the private sewerage system must meet SEPA standards for the protection of the environment under CAR. Generally this will present no insurmountable obstacle however some areas are constrained by the proliferation of private systems to the point that discharges of treated sewage may require enhanced treatment to meet environmental standards. We have published a layer on GIS which highlights such areas and we recommend that the proposed plan refers to or contains a link to this information.

Policy ENV12 Surface Water Drainage

We request that policy ENV12 includes reference to construction phase SUDS as this is a legal requirement. Further information on the requirement of construction phase SUDS can be found in our regulatory guidance, WAT-RM-08: Regulation of Sustainable Urban Drainage Systems (SUDS).

Policy ENV13 River Engineering Works and Culverts

We recommend that this policy should be renamed, Engineering in the Water Environment. The policy in the adopted local plan is very focused on river and culverts. The policy should incorporate impacts on the water environment in lochs and coastal waters as well as on rivers and all types of engineering not just culverts. These developments are covered through the Water Environment (Controlled Activities)(Scotland) regulations 2011 (as amended) but it is also worth noting that opportunities lie where engineering works are being carried out to make improvements to existing engineering impacts and alleviate pressure on the water environment.

Sustainable Flood Management

SEPA’s new flood maps are now available and contain more information than the previous maps including flooding from surface water. The new SPP also contains a section on surface water flooding. We request that the flood risk policy ENV16 explicitly refers to surface water flooding.

Renewable Energy
Main Issues Report Our Live Park Comments Received

We also welcome the retention of policies REN1, REN2 and REN3.

Sustainable Waste Management

We consider that retention of the existing policy wording in WAS1 is appropriate. We consider that retention of the existing policy wording in WAS2, subject to some minor amendments is appropriate. Point (a) should be amended to remove reference to Area Waste Plans, as these have been superseded by the Zero Waste Plan. We recommend that point (c) is removed as there is no requirement through national planning policy for BPEO to be demonstrated.

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Chapter Commented on: 7 Policy List and Action Summary >> 7.1 Introduction >> 7.1.1

Drivers for Change Question 1: Do you agree with summary outlined? Is there anything we have missed?

Customer Reference: 00188

Customer Name: Sportscotland

Customer Type: Public Body

Comment Method: EMAIL

Verbatim Comment:
Please refer to attachment on existing policies.

Please see Appendix 3 for further information
Broadly, the environmental issues/concerns and key trends have been correctly identified, the assessment of likely significant effects on the environment have been carried out satisfactorily and the measures that could prevent, reduce or offset any significant adverse effects on the environment when implementing the Plan have been clearly identified.

However, with respect to Callander there is no narrative or evidence that adequately explains why some preferred allocations and some alternative sites have been assessed as having positive impacts on SEA objectives related to biodiversity and landscape. The assessment of these sites in the main SEA Assessment Matrix (Appendix E) is not consistent with the table in Appendix F. In addition, there needs to be a clearer recognition of the potential impacts and mitigation needed with respect to the proposal for 40-50 chalets at Braeval. Further detail on this is given in the attached Annex 1.

I hope you find the attached helpful and look forward to future discussions on the proposed monitoring strategy. (ATTACHED ANNEX 1)

(Notes:
- SEA Assessment Matrix can be found within Strategic Environmental Assessment Draft Environmental Report within downloads section within www.ourlivepark.com
- Annex 1 can be found at the end of this report under Appendix 8)

**Please see Appendix 8 for further information**
In response to the Draft Environmental Report Stirling Council make the following comments.

As the overall development strategy is proposed to stay largely the same, the overall environmental impacts are not likely to change from those which were assessed in the Local Plan Environmental Report. The MIR does seek to introduce some flexibility and new approaches to secure its delivery.

The more significant development proposals of potential interest to the Stirling LDP area relate to:
- Renewable energy proposals (21 hydro schemes in run of river locations and one biomass plant proposal)
- Additional development land for a range of uses in Callander
- Small scale housing development

Mitigation has been identified where a significant negative environmental effect is identified and development sites have been excluded due to issues or effects that SEA objectives include. Negative effects may also be mitigated though another policy, or through Supplementary Planning Guidance.

The key finding of the SEA process is that the importance of the National Park’s environment is recognised in regard to its Special Qualities in both the built and the natural environment. The number and range of international, national and local designations has meant that the new development plan polices and proposals have to be carefully considered.

Following from the above the Council is content environmental effects have been properly assessed and, where necessary, sites have been excluded or appropriate mitigation identified.
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 2 National Park Partnership Plan >> 2.1 Vision for the Park >> 2.1.1

Vision Question 1: Do you agree with this vision?

Customer Reference: 00144  
Organisation: Loch Lomond Steamship Company

Customer Name:  
(If applicable) 

Comment Reference: LDP01/MIR/CONS/00144/1/002  
Comment Method: EMAIL

Customer Type: Private Business

Verbatim Comment: VISION Q1

As Loch Lomond is one of the top visitor destinations in Scotland, the Vision is absolutely correct.
### 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.1 Drivers for change

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Further investment must be made into better public transport on Loch Lomond and the acquisition of all piers into public ownership. One aim must be to provide a cross-loch water-based transport system the length of the loch; and this can only be done if all piers are taken out of private ownership because this at present is a serious restriction to access.
Agreed, but while Blairmore, Strone, & Kilmun are specifically highlighted for sea access (via their piers), there is no mention of a similar approach to Loch Lomond, i.e. no mention of piers at Balloch, Luss, and Tarbet (all in public ownership), nor of Balmaha, Rowardennan, and Inversnaid (all in private ownership and two pier have restricted access and in poor condition).
Chapter Commented on: 4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.9

Infrastructure and Services Question 1: Do you agree with the opportunities listed above? Are there others?

Customer Reference: 00144
Customer Name: Loch Lomond Steamship Company

Comment Reference: LDP01/MIR/CONS/00144/1/004
Comment Method: EMAIL
Customer Type: Private Business

Verbatim Comment:

Q.1  Agreed, but infrastructure should include piers.

Q2:  We believe all piers (on Loch Lomond) need to be in public ownership. We propose that a policy be worked up to achieve this.

A review should be carried out to revise and update the policy on signage.
4 Identifying the Main Issues - what needs major change and what are the options? >> 4.3 Main issues, potential options and solutions >> 4.3.12

**Options & Solutions for Infrastructure & Services Question 4: Do you agree with the options listed above? Any further suggestions?**

Additional Observations -
No mention of Ardlui, the village at the head of the loch. Should Maid of the Loch become operational again, Ardlui could be a suitable destination for cruises (the pier there was closed in 1963 and subsequently demolished).

In conclusion, our opinion is that the restoration of Maid of the Loch to operational condition and the creation of a visitor learning experience at Balloch Pier also meets all four of the National Park's main aims as set out in section 1.4 on page 10. The report makes several mentions of improving - and increasing - the water based transport on Loch Lomond, better water access, making it easier to move around, etc., but none of the six piers on the loch are mentioned. With Maid of the Loch there is a positive solution to most of these issues, yet the Maid is not referred to at all. As an historic vessel with the infrastructure facilities - including the Grade A Balloch Steam Slipway - we feel this should be accorded positive support in this document.
Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.4 Arrochar & Succoth >> 5.4.1

Arrochar & Succoth Question 1: Do you agree with the Vision above? Why?

Agreed, but emphasize sea/water access.

Customer Reference: 00144
Organisation: Loch Lomond Steamship Company
Customer Type: Private Business

Verbatim Comment:
ARROCHAR AND SUCCOTH Q.1
Agreed, but emphasize sea/water access.

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.5 Balloch

Flooding: Closer cooperation with Scottish Water is required as their barrier at Balloch is a key factor in flooding and flood prevention.

Customer Reference: 00144
Organisation: Loch Lomond Steamship Company
Customer Type: Private Business

Verbatim Comment:
Flooding: Closer cooperation with Scottish Water is required as their barrier at Balloch is a key factor in flooding and flood prevention.
Main Issues Report Our Live Park Comments Received

Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.5 Balloch >> 5.5.1

Balloch Question 1: Do you agree with the preferred option? Why?

Customer Reference: 00144
Customer Name: Loch Lomond Steamship Company
Comment Reference: LDP01/MIR/CONS/00144/1/001
Comment Method: EMAIL
Customer Type: Private Business

Verbatim Comment:
Balloch Q1 -

Vision is not supported. Balloch is the busiest gateway into the National Park (p48); one of the largest towns; and has potentially the largest area to develop (p83). Create a link between Balloch Castle Country Park and West Riverside to provide a circular link joining up the town, the park, the pier and Loch Lomond Shores.

Maid of the Loch and Balloch Castle, both historic attractions, received most support to develop in the recent Balloch and Haldane Community Action Plan report - this needs to be recognised. LLSC has the historic Balloch Stream Slipway which is one of the only a handful of Grade A listed buildings that is fully operational and open to the public. This is not recognised in the report and should be included and integral to the south end of Loch Lomond.

The surprising omission of any reference whatsoever not only to the "Maid of the Loch" but also to a vision and associated policies regarding the future of the principal piers on Loch Lomond and their role in the Loch's tourism and water transport strategy have been outlined previously. Furthermore however, we are disappointed to note that the opportunity which exists for the refurbishment and redevelopment of Balloch Pier to enhance and improve existing tourism development and leisure facilities as well as strengthening the connection of West Riverside to the loch has not been highlighted.

Accordingly it is requested that the "Main Issues" to be addressed and considered in the new Local Development Plan be revised appropriately to identify and support this development opportunity on the site of the former station at the pier as was discussed with, and favourably received by, the Park Authority in November 2013. It will be recalled that the development was based on plans showing a passenger transfer and visitor facility on the structure to facilitate the return of the "Maid of the Loch" to commercial sailing.

It is not clear from the Main Issues Report what criteria have to be met for a potential development site to be awarded the status of a "placemaking priority" it is further requested that consideration be given to Balloch Pier to be so designated in any new Development Plan.

While noting that the revised boundary of Policy ST6 does not affect the interests or assets of LLSC, the amendment to the siting of the policy boundary for T3 north of Drumkinnon Bay and the related indication of "New Infrastructure to Support Water Transport" do not appear to incorporate Balloch Pier itself. It is requested that the
"Main Issues” to be addressed by the new plan be revised to include an appropriate amendment to rectify this.

### Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.21 Tarbet

**Tarbet Question 1: Do you agree with the preferred and long term options? Why?**

**Customer Reference:** 00144  
**Organisation:** Loch Lomond Steamship Company  
**Customer Name:**  
**Comment Reference:** LDP01/MIR/CONS/00144/1/006  
**Comment Method:** EMAIL  
**Customer Type:** Private Business

**Verbatim Comment:**
Tarbet pier appears to be excluded from any preferred site. We recommend the pier be included within the masterplan placemaking priorities as this is a key feature for water transport, and could link well with the option of increasing links to the train station.

### Chapter Commented on: 5 Placemaking - What sites should be considered for development? >> 5.15 Kilmun, Strone & Blairmore >> 5.15.1

**Kilmun, Strone and Blairmore Question 1: Do you agree with the preferred option? Why?**

**Customer Reference:** 00144  
**Organisation:** Loch Lomond Steamship Company  
**Customer Name:**  
**Comment Reference:** LDP01/MIR/CONS/00144/1/007  
**Comment Method:** EMAIL  
**Customer Type:** Private Business

**Verbatim Comment:**
It is interesting that all three village piers are specifically highlighted as all are in private ownership (as opposed to the lack of inclusion of Loch Lomond piers). We are aware that Blairmore Pier was rebuilt some years ago and is visited once a week in July & August by the Waverley, and by Munro's vessels. We understand that the owner of Strone pier will not allow Waverley to call; and as Western Ferries own Kilmun pier and use it to berth their spare vessel, access may be an issue.
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<td>Balmaha Question 1:</td>
<td>Do you agree with the preferred option? Why?</td>
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Customer Reference: 00144  
Customer Name:  
Organisation: Loch Lomond Steamship Company  
Comment Reference: LDP01/MIR/CONS/00144/1/008  
Comment Method: EMAIL  
Customer Type: Private Business

Verbatim Comment: Preferred option excludes any reference to the pier. In order to achieve on the LIVE Report’s aims, this needs to brought into public ownership owning to the difficulties being experienced in restricted access due to private onwership. Full access to the pier will open up many possibilities to improve water transport, reduce congestion, etc.