

## **Agenda Item 7 - Appendix B: Summary of Examination Report Recommended Modifications to the Proposed Plan**

### **Sites**

1. Pages 12 to 141 of the examination report contain the detailed consideration and findings in relation to the unresolved representations to sites included in the plan. The reporters' have made only minor modifications to some sites, including the addition of further site specific development requirements to address concerns raised by respondents to the plan. Site specific details and considerations are delineated on the plan's maps by use of icons, and the reporters have referred to these extensively in the report as giving cognisance to particular site specific issues (for example flood risk, drainage impact assessment or transport assessment) that development proposals must address as well as adding in new icons to help address matters raised in unresolved representations.
2. The sites that received the most representation were located in Drymen and Callander with a smaller number of objections received for Balloch, Arrochar, Succoth, Tarbet and Balmaha. In relation to these, the examination report recommends the following (the site references contained in the proposed local development plan are included for cross referencing purposes):-

Arrochar and Succoth – More detail to be provided for Succoth (MU2) to clarify the potential uses that can be accommodated on the site as including community, visitor experience and open space. This is consistent with the Authority's recommendation.

Balloch – The Park Authority recommended that the site boundary for East Riverside (VE2) be amended to remove the western half of the site shown in the plan and the reporters' have supported this amendment.

Balmaha – No changes recommended.

Callander – Minor changes recommended to add information on site specific considerations:

Claish farm (MU2 and LT2) and Blagibbon Drive (LT3) sites received the most representations. Claish Farm (MU2 and LT2) is the area to the south of the River Teith identified as the most suitable location for future growth of Callander. The reporters' have supported development on this land, referring to the 'park authority's well researched and fully articulated strategy of promoting land to the south of Callander for that growth'. With regards to the Balgibbon Drive site (LT1), the reporters' support the inclusion of this site in the plan in order to help meet housing need and to comply with Scottish Planning Policy (SPP) requirements in providing a choice of site options to ensure a range of housing options across Callander as a whole.

Drymen – No changes recommended.

Tarbet – Modifications recommended to site H1 (land to the south of A83 – housing) to reduce the size of the site to exclude ancient woodland, merge some of the central sites to create one larger mixed use site, more detailed annotations and referencing via additional site icons. This is consistent with the Authority's recommendation.

## **Policies**

2.1. Several policies received comments and requests for amendments following the Proposed Plan consultation, with the key policies that responses sought clarification or modifications including the plans:-

Overarching Policies (these set out the expectations and requirements for all new development proposals)

- i. Overarching Policy 1: Strategic Principles – The representations raised concerns in relation to the policy wording and made suggestions for possible changes to these. The reporter is largely supportive of the Park Authority's proposed changes in relation to digital and telecommunications infrastructure and waste hierarchy principles. Whilst heat mapping has not been undertaken for the Park area, the reporter notes that consideration has been given to matching potential opportunities for new sources of heat and where demand is generated. The addition of more explicit wording to this policy regarding the creation of opportunities to shared heat schemes is also supported by the reporter. The reporter has also inserted reference to the Sandford principle in this policy in order to make this more explicit.
- ii. Overarching Policy 2: Development Requirements – The only representation to this policy concerned the wording in respect of climate friendly design and the reporter has supported the suggested wording changes to the policy made by the Park Authority which clarify that in addition to minimising overall energy requirements through conservation measures, new buildings will incorporate on-site low and zero carbon generating technologies to meet 10% of the overall energy requirements of the building rising to 20% by December 2021. Additional guidance is to be provided in the accompanying Supplementary Guidance on Design and Placemaking.
- iii. Overarching Policy 3: Development Contributions – The status of the accompanying draft Planning Guidance on Developer Contributions is to be changed to become statutory Supplementary Guidance to the plan and to include details of the level of contributions to be sought and the methodology used to calculate them.
- iv. Housing Policies – There were a small number of representations in relation to housing strategy and policy in the plan. These included new housing targets for the National Park - specifically how the target of 75 new homes per annum has been derived from the housing need and demand assessments (HNDAs) of the Park's four constituent local

authorities. The reporter concluded that the housing supply is informed but not determined by the HNDAs and that other factors were used to review the target, including a strong placemaking approach. The reporter considers the land supply to be generous (this is a requirement of SPP - Scottish Planning Policy) and has not recommended any further new housing allocations except for one new site for 6 houses in Gartmore. The reporter is satisfied that it is reasonable for the plan to rely on a proportion of windfall development (unplanned for housing that takes place on sites not specifically identified for development) in recognition of the nature of small scale development within areas such as the Park.

With regards to affordable housing the reporter supports the plans requirement for contributions of varying scales of 25%, 33% and 50% affordable housing contributions on sites of 4 or more homes depending on the town or village that the site is located in. Whilst this higher than the SPP requirement that these should generally be 'no more than 25%' there are exceptional reasons to justify this in the National Park and a flexible approach to applying these requirements is set out in accompanying draft supplementary guidance on housing. Lastly, in relation to new housing in the countryside, the reporter states that if the housing market was allowed to function more naturally in the Park this would likely have unintended and undesirable consequences because of unsustainable growth and suburbanisation of the countryside and more rural areas. In this regard, the approach set out in the plan (support for affordable housing and new housing required to support an established rural business or a newly formed croft) is considered to be to be 'well founded and necessary'.

- v. Visitor Experience Policies – Unresolved representations to this section of the plan related mostly to camping provision in the Park (perceived lack of guidance in the plan and integration with the 'YourPark' project). The reporter agreed that in principle it is important to ensure consistency between the plan and other work being undertaken by the Park Authority on camping however does not consider it appropriate for the plan to identify sites for camping at this time. In reaching this view, the reporter notes that existing and future camping provision is currently the subject of a strategic review and that the plan should be informed by the outcome of this. The reporter supports the Park Authority's stance that the accompanying Planning Guidance to the plan will be updated to provide further details on camping once the review process is complete and considers this sequential approach to planning for camping provision to be soundly based, providing a robust basis for moving forward, thereby addressing the concerns raised in representations.
- vi. Natural Environment Policies - Unresolved representations to the natural environment policies in the Plan regarded concerns with mainly wording amendments or clarifications regarding references to wild land, flood risk, surface and waste water management, the water environment and coastal

marine area, fisheries and land contamination. The reporter has supported the proposed wording amendments suggested by the Park Authority.

- vii. Minerals – There were two unresolved representations regarding the restrictive nature of this policy and reference in it to Water Environment and Waste management regulations. No changes are recommended.