



National Park Authority Board Meeting

Agenda Item 9 - Appendix 1

Summary Report of Consultation & Recommended Changes

The following report is ordered by the structure of the Proposed Local Development Plan (Proposed Plan) and should be read with this and Appendix 2 (only published online) which includes the full detail of all responses also ordered by the Plan structure.

This report only includes a summary of the main points raised in responses regarding policies and proposals and a summary of the Authority's proposed response that would be submitted to the Scottish Ministers with any other editorial or presentational corrections.

SECTION 1: Introduction

One responder raises concern over lack of provision for wildlife habitat maintenance and enhancement in the Plan with too much emphasis on economic development. Also there was concern over the omission of the Sandford Principle which could be addressed by introduction of icon for local importance wildlife areas.

Summary of Recommended Response

The Introduction section of the Proposed Plan provides the four aims of the National Park along with the Sandford Principle on page 9. The responder has asked that the Plan include provision for small areas important for wildlife within the villages and that they should be Local Nature Reserves (LNR's) with an assumption against development. The Adopted Local Plan 2010-2015 has a policy ENV 3 Local Nature Conservation Sites (LNCS's) which is the phrase collectively used for all areas of space used for wildlife or wildlife and people alike. Local Nature Reserves are slightly different in that they are designated (with the approval of SNH) by Local Authorities' under a 1949 Act which was originally brought into play to ensure there was adequate management of selected areas (which included Sites of Special Scientific Interest). There is no up-to-date list of LNR's in the National Park.

Nowadays these sites are protected by other legislation and along with Special Protection Areas, Special Area of Conservation and National Nature Reserves. Natural Environment policies protect these sites. Additionally protection and enhancement of wildlife habitats and habitat networks is covered by Natural Environment Policy 5 Species and Habitats and Policy 6 Enhancing Biodiversity. Policies 8-10 protect peatland and woodland. There is no need for an additional policy for LNR's as there is ample protection for wildlife areas in towns and villages.

SECTION 2: Vision

Natural Environment

The Scottish Government considers the Proposed Plan should include reference to National Marine Plan.

Summary of Recommended Response

Minor modification proposed to the Plan. Reword second sentence in second paragraph on page 22 to state (new text in italics): ‘This includes Scottish Planning Policy, the National Planning Framework *and the National Marine Plan* at a national level and a whole range of regional and local plans, strategies and investment programmes prepared by Local Authorities and Government Agencies, covering transport, economic development, housing, open space, education to name a few.’

SECTION 3: Place

Scottish Natural Heritage commented across a number of sites considering that, for some, the Plan should show more explicitly that a requirement for appropriate mitigation against any potential adverse impact on the qualifying interests of nearby or adjacent European Protected Site should be highlighted:

Balmaha TR1: Balmaha Pier (Transport)
Balmaha H1: Forestry Commission site (Housing)
Balloch VE1: West Riverside (Visitor experience)
Balloch VE2: East Riverside (Visitor experience)
Callander ED1: Lagrannoch Industrial Estate (Economic development)
Callander MU2: Claish Farm (Mixed use visitor experience, economic development, housing and playing field)
Callander LT2: Claish Farm South (Long term mixed use housing and visitor experience)
Callander LT1: Cambusmore (Long term Visitor experience)
Callander RA1: Callander East (Rural activity area)
Croftamie H1: Buchanan Crescent (Housing)
Drymen RA1: Drymen South (Rural Activity)
Gartocharn H2: France Farm, (Housing)
Killin ED1: Road Depot (Economic Development)
Killin RA1: Acharn (Rural activity area)
Tyndrum MU1: Clifton (Mixed use visitor experience and economic development)
Strath Fillan RA1: Strathfillan (Rural Activity Area)

Summary of Recommended Response

Minor modifications proposed to add a new ‘Natura’ icon to the key for site maps and the above sites. The explanation for this icon in Appendix 4 should read: “A Natura designation icon indicates where proposals have the potential to have an adverse effect on a European protected site’s qualifying interests including migrating fish species, geese and otters. Proposals for development must be accompanied by an

expert appraisal to inform a project-level Habitats Regulations Appraisal (HRA). Pre-application discussions will clarify the level and detail of appraisal that must be submitted. A range of mitigation measures should be identified where potential impacts arise including a construction method statement or species protection plan.”

CALLANDER (pp44-50)

Callander - General

McLaren Community Leisure Centre consider the Plan should reflect both the relative urgency and potential benefits to be derived from a replacement pedestrian/cycle bridge and new road bridge in Callander as reflected in the Charrette, with proposals to improve access connections throughout Callander.

Summary of Recommended Response

It is appreciated that there would be significant benefits to better connections to different parts of Callander with a replacement pedestrian bridge and a new road bridge. This Plan reflects the 2011 Charrette outcomes and the National Park Authority has been fully engaged and supportive of the delivery through the Callander Partnership. Infrastructure delivery must be realistic and balanced with development viability and the road bridge is likely to be a long term project, primarily due to the cost and demand. Short to medium development needs can be accommodated by existing road infrastructure. Funding is not currently available for the long term bridge option and so needs time to ensure the need/demand can justify funding infrastructure. **No modifications are proposed to Plan.**

Callander MU1 – Station Road – Mixed Use (Retail, Business, Car parking and Transport)

Two responders raise concerns of loss of car parking whilst another responder asks for the site to be used for a community hall instead.

Summary of Recommended Response

The site is a key regeneration opportunity in Callander located close to local shops, services and facilities, and is underused. It is proposed to retain a car parking element based on any recommendations from a review of town centre parking – this was started in 2012 but was not progressed. Site icons along with overarching policy address road matters and parking provision would be dealt with at the planning application stage. **No modifications are proposed to Plan.**

Callander MU2 – Claish Farm – Mixed Use (Visitor Experience, Economic development, Housing 90 homes, & Playing field)

Five responders raised concerns over loss of open aspect/ landscape impact, privacy (from residents on the boundary of the proposal), road safety, impact on wildlife corridor and River Teith, noise impact, archaeology impact and flooding. Cambusmore Estates raise concerns over school capacities. McLaren Leisure Centre support the site allocation, although suggest a flexible games space be included, and for the Plan to specify that all new development in Callander would contribute towards a strategic infrastructure fund for the benefit of not only the long term bridge option but also links which benefit the entire towns connectivity. Scottish Natural Heritage ask for natural environment icon to safeguard

adjoining Mollands Site of Special Scientific Interest.

Summary of Recommended Response

This site is a significant proposal in the National Park and for Callander which was first identified in the 2011 Charrette with broad consensus on this being the main area of future growth. In recognition of this, extensive discussions have taken place with our own specialists, partner organisations and the community on the approach in the Plan and the likely implications on the town's infrastructure and services. We are therefore confident this site is deliverable, but it is recognised it needs a sensitive approach. This is recognised, in bespoke masterplan framework guidance, published in draft with the Proposed Plan, which provides more detail in what is expected to be submitted along with any future planning application.

In terms of flexible games space, the MU2 site map includes playing field within the title description and the Callander South Masterplan Framework Planning Guidance on page 24 shows an area within the site with caption stating 'Allowance of 1.2Ha for possible sports pitch expansion.' Whether or not the 1.2Ha is used for playing fields or flexible games space will be largely determined by school requirements at the time of planning application. Matters of concern would be effectively addressed through the details submitted as part of the masterplan. In terms of school capacities, please see the response below to H3 site.

It is agreed that the matter of the strategic infrastructure fund identified in the Callander South Masterplan Framework should also be made in the Proposed Plan for clarity and the associated Guidance will be updated prior to adoption to clarify developer contributions expected (Long term bridge appraisal costs to be produced). It is not proposed that the fund will relate to other development as path networks are supported by other funding streams including support from the National Park's Outdoor Recreation Plan.

Minor modifications proposed to include:

- a. a bullet point stating 'accommodate a replacement pedestrian bridge, a long term road bridge and associated road improvements. On p44'**
- b. the following after the bullet points; 'All development within Callander will contribute towards a strategic infrastructure fund with details within the associated Callander South Masterplan Framework Planning Guidance.' On p.44. And**
- c. Add a natural environment icon to site map on p.47.**

Note: The Planning Guidance will require to be updated prior to adoption to clarify the amount of developer contributions proposed per development use based on future bridge assessments.

Callander ED1 – Lagrannoch Industrial Estate – Economic Development

Drummond Estates (the site owner) requests that the site is identified for mixed use for industrial, housing and open space including allotments. 9 responders object to industrial development on basis of noise and air pollution, road safety – use of narrow section for access on east side of site, loss of amenity - privacy, scale of buildings, impact on wildlife

and natural habitat. Responders highlight site should be reallocated for open space – allotments or residential/retail.

Summary of Recommended Response

This site forms part of ED1 Lagrannoch site for Economic Development Class 4/5 uses within the Adopted Local Plan and is an historical economic development site. There are a limited number of economic development sites throughout the Park with the greatest demand in Callander as our biggest town. Lagrannoch Industrial Estate is a long established business and industrial area and the proposed Callander ED1 site adjacent is a complementary land use. The allocation is not proposed for heavy industrial uses or for other business which would create significant land use conflict with surrounding land uses. It is recognised that there are a range of considerations that any development would need to address – these are reflected on the site map for the site on p48 which includes Landscape Context, Historic Environment and Design Document icons – and would ensure future development would complement adjoining historic garden and designed landscape, housing and conservation area. In terms of allotments, for the above reasons it is not proposed to change the proposed use. Generally allotments could be supported through planning policies elsewhere. The route of the potential long term road bridge is proposed through the southern part of the established Lagrannoch site linking to Geisher Road. All other concerns over various impacts would be addressed at the planning application stage through various design solutions and compliance with the Plan's policies. **No modification proposed.**

Callander H1 – Pearl Street – Housing (5 homes)

A responder asks for a small area of site adjacent to Main Street to be removed as they believe it is within their land ownership.

Summary of Recommended Response

Stirling Council has confirmed that they are the owners of the site including access to the Main Street. Owners of No 110 High Street simply have a servitude right of access over the land to access the rear of their property. In terms of Designing Streets it is preferable that future residents will have easier pedestrian/cycle access to Main Street shops and services. **No modification proposed.**

Callander H2 – Old Telephone Exchange (23 homes)

There was only two comments from Scottish Natural Heritage and SEPA received in relation to flood risk. Even though a flood risk assessment was already carried out for the site, any changes to the proposal would require a updated flood risk assessment.

Summary of Recommended Response

The comments from SNH and SEPA are acknowledged and in response a flood risk assessment icon should be added. **Minor modification proposed to add a Flood Risk Assessment icon to site map.**

Callander H3 – Churchfields – Housing (30) homes

One responder objects on the grounds of flooding. Cambusmore Estate considers land should be set aside for future school expansions on this site.

Summary of Recommended Response

The site map includes a flood risk icon. In terms of setting aside land for future expansion of schools, this has been considered during the preparation of the Plan and detailed discussions have taken place with the Education Service in Stirling Council. It was concluded that there was no need at this time to identify land for any school expansion. Demand created from new development, if the build rate was managed, could be accommodated in the existing School estate although this needs to be monitored and reviewed when this Plan is updated. Further, should there be any change during the lifetime of the Plan, this can be considered through the overarching developer contributions policy which would be assessed at the planning application stage. **No modifications proposed to Plan.**

Callander RA1 – Callander East – Rural Activity

Two responders object to development due to impact on wildlife and habitat, ancient burial chamber, moraine, ancient woodlands, walking, loss of open space, pollution of streams, flooding, impact of HGVs and road safety.

Summary of Recommended Response

This is an established historical development site which largely is within brownfield land (land previously developed). Objections were previously considered to this site at the 2011 Examination of the Adopted Local Plan. Site assessment icons along with Plan policies include all necessary planning requirements to protect wildlife and habitat on site as appropriate, safeguard retention of core paths, address flooding, pollution, road safety and impact on archaeology. **No modifications proposed to Plan.**

Callander VE1 – Auchenlaich - Visitor Experience

Responder objects to development due to impact on wildlife and habitat, archaeological areas, walking and ancient woodlands.

Summary of Recommended Response

This is an established development site which largely is within brownfield land (land previously developed). Objections were previously considered to this site at the 2011 Examination of the Adopted Local Plan and the boundary was amended as a result to recognise the presence of the glacial moraine, important woodland and red squirrel habitat. Site assessment icons along with Plan policies include all necessary planning requirements to protect wildlife and habitat including any ancient woodland on site, safeguard core paths and address impact on archaeology. **No modification proposed to Plan.**

Callander RET1 – Stirling Road – Retail

One responder requests that the site to be re-designated for housing, highlighting that in the July 2011 Local Plan Examination the Reporter stated no pressing need for a site to be identified for modern convenience floor space in Callander.

Summary of Recommended Response

Since the Examination, an application has been approved for a retail development as was highlighted in the Main Issues Report. It is considered that it is appropriate to reflect this in the Local Development Plan. **No modifications proposed to Plan.**

Callander LT1 – Cambusmore – Long Term Visitor Experience

The landowner's agent requests an area adjacent to existing houses to be identified for 4 houses and for the northeast part of the site (adjacent to Gart Caravan Park) to be identified for tourism – specifically new leisure and hotel.

Summary of Recommended Response

The full land ownership is part of a long term tourism allocation in the Adopted Local Plan and is currently an operational quarry which is consented until 2023. This was highlighted during the Main Issues Report stage. The full site area was raised at the Additional Sites Report stage and not recommended for development due to: a) ongoing quarry operations, b) the site for housing is too far outside of town in terms of separation and there are numerous preferable housing allocations allocated elsewhere, and c) flood risk and road access constraints.

The 4 houses proposed and tourism to the northeast which is not subject to the quarry application could be assessed against Plan policies via a planning application. Piecemeal development is not recommended without the support of a masterplan to ensure that short term development proposals do not jeopardise longer term options for the overall site area. **No modification proposed to Plan.**

Callander LT2 – Claish Farm – Long Term Mixed Use (Visitor Experience and 100 Homes)

Historic Environment Scotland asks for indicative housing numbers to be removed from the site allocation. Two responders raise concern over impact on archaeology, flooding, ponding, road safety, noise pollution from construction and impact on local business. Cambusmore Estate Trustees raise concerns on impact on adjacent River Teith Special Area of Conservation, ask for site to be removed and replaced by allocating Auchenlaich site VE1 for housing and visitor experience as would remove need for road bridge and more easily accessed via the A84 road. SEPA highlight there may be an issue with surface water from nearby hills.

Summary of Recommended Response

Concerns raised in regards impact on historic environment are appreciated. However, Planning Circular 6/2013 Development Planning states: '...LDPs should provide a broad indication of the scale and location of growth up to year 20' and the number is solely indicative. In addition the importance of the historic environment considerations on this site are recognised and reflected in the inclusion of site map icons for the historic environment and design statement (masterplan) with associated Callander South Masterplan Framework Planning Guidance.

In terms of the suggestion of replacing this site with site VE1 at Auchenlaich is not considered a viable option. As previously highlighted, this area is the main direction for

growth in Callander as established through the Callander Charette. It is appreciated that there will be matters of deliverability to be addressed for a long term bridge option but this would be addressed through the subsequent review of the approach set out in the Masterplan Framework Planning Guidance. The River Teith Special Area of Conservation adjoins the indicative site area and is protected by plan policies and site map icons.

Minor modification proposed to add drainage impact assessment icon to site map.

Callander LT3 – Balgibbon Drive – Housing (22 Homes)

20 individual responders including petition signed by all Balgibbon Drive residents (as stated in representation), Callander Community Council and Cambusmore Estate Trustees object to site. The vast majority of objections relate to road safety matters. Objections were made on the following grounds:

- Road Access/Safety – flawed Transport Statement in regards narrow road widths and vehicle flows, inadequate visibility splays at junctions, impact on pedestrians/cyclists using national cycle route, restricted road access due to on street parking and access difficulties for emergency and refuse vehicles
- Geology – adverse impact on glacial moraine
- Flooding – existing drainage and flooding problems will intensify
- Natural environment – adverse impact on wildlife and habitats including woodland, pollution of streams
- Service provision – insufficient capacity of local schools and doctor practices
- Open Space – loss of open space required to accommodate site access compromised by future vehicles passing area of open space. Also area of open space not for sale. Impact on walkers.
- Contrary to Callander Charrette as agreement of growth to south and not to east or west
- Noise from through traffic
- Privacy – overlooking concerns
- Property values and loss of view
- Construction – noise pollution, visual impact and traffic
- Proximity of golf course - risk of injury or property damage from golf balls for future residents adjacent
- Consultation process – residents disadvantaged as previous report stated site no longer deemed suitable and so did not attend Board Meeting.
- Housing need - two houses on market for over a year

Summary of Recommended Response

Strategy

While confident that South Callander can deliver the growth needed there are likely to be development challenges in the longer term in respect of the significant infrastructure requirements. This will depend on the rate of development going forward, but there is a need to have sufficient options to ensure what limited choices there are for housing growth outside Callander South is safeguarded. Currently there are only two options north of the River over the Plan period; a) H1 Pearl Street which is solely for 5 homes, and b) H2 Old Telephone

Exchange (23 homes) which has current planning permission identified within the Strategic Housing Investment Plan and no other options for the longer term.

Process

This site continues to be allocated from the Local Plan as a long term housing site. It has not been identified for short term development due to an outstanding road access land ownership constraint. The scale of development has been reduced from Local Plan from 28 to 22 homes, although this is only indicative.

Development Issues

In terms of road safety, no objection was received from Stirling Council Roads department or Transport Scotland. Further advice has been sought from the Council in light of the further objections received, however, it is still concluded that a safe development is achievable on this location. The site is retained as it is a relatively discreet edge of Town site with a natural boundary and is within reasonable walking and cycling distance of town centre services and facilities. In addition, the site has been included as there are relatively limited options for future housing land in Callander without significant infrastructure issues to work through. Plan policies and site map icons will address planning concerns above relating to site. Site is proposed for long term development. Education provision is a matter of developer contributions and would be addressed at the planning application as required subject to development timing. In terms of G.P. practices it is for NHS to meet demand as and when required.

In terms of the risk from golf balls, there are existing houses along Aveland Road, Livingstone Avenue and Balgibbon drive of equal proximity to the golf course as the proposed houses without the need for a 10 metre high fence. The 10 metre high fence would not be in keeping with the rural nature of the surrounding landscape and existing trees reduce the risk from golf balls entering the site. Details of boundary treatment and landscaping would be addressed at the planning application stage and would complement existing boundary vegetation. In terms of the construction being an adverse visual impact, the construction period is simply temporary. Construction traffic would be handled by a Construction Traffic Management Plan.

Matters of loss of privacy would be addressed at the planning application stage and could be addressed through various design measures including location and orientation of buildings, positioning of windows from habitable rooms, boundary treatment and landscaping.

Concerns over loss of views, property values and land ownership are non-planning matters.

No modifications proposed to the Plan.

ARROCHAR & SUCCOTH (pp51-54)

Arrochar MU1: Land next to 3 Villages Hall (Visitor Experience and Community Use)

There were no objections to this site but four comments in relation to maximising the cultural heritage and recreational tourism potential of the site, concerns over the loss of the football pitch from SportScotland, protection of the trees and securing open space for recreation and social housing for the community from the Community Council.

Summary of Recommended Response

This site is important to the redevelopment of a central focus for Arrochar and is currently allocated as a mixed use site within the Adopted Local Plan. The allocation capitalises on the central location, views and accessibility to the Loch as well as the 3 Villages Hall as identified in the Charette process. There will be an element of recreation and cultural heritage.

In relation to the derelict football pitch, which has not been used for some time, there is a requirement in Scottish Planning Policy (paragraph 226) to either replace with a new facility of comparable or greater benefit or demonstrate in a relevant strategy that there is a clear excess in provision to meet current and anticipated demand. The Argyll and Bute Sports Facility Strategy 2010 identifies the sports pitch at Succoth but there is no mention of the other two unused sites in Arrochar. Therefore it can be concluded from this that there is no demand for these facilities. The need to include public space or green space on this site is stated in the Placemaking Priority description on page 51, with this expected to include a village 'centre' place potentially along with green space that is wooded behind the 3 Villages Hall but this detail is more appropriate for the planning application process.

The points made by the Community Council in relation to social housing and are noted and the requirement for this site is 25% affordable housing. The tenure of affordable housing cannot be controlled to social housing as desired. **No modifications are proposed.**

Arrochar MU2: Succoth (Visitor experience and community use)

There were five objections to this site, including the Community Council with the key reasons being flooding and concern that the area is unsuitable for large scale development. Issues of wildlife and landscape were also mentioned. There was a desire that it was designated as open space.

Summary of Recommended Response

The site is within a natural flood plain and identified in the 1 in 200 year on Scottish Environmental Protection Agency's indicative flood maps. Further advice has been sought from SEPA and Argyll and Bute Council as Flood Authority in light of the objections received about the known flooding on the site. Both confirmed that even though the site has known flooding there is potential for development. The map icons indicate that a Flood Risk Assessment would be required to be submitted with any application relating to the site. The assessment at the application stage would identify the areas that have potential for development and those that are not suitable due to flooding.

In terms of the allocation, the site is currently allocated for community and recreational uses in the Adopted Local Plan. The Adopted Local Plan contained a list of potential uses and this confirmed that large scale tourism development was not envisaged for the site. In changing to the new style of plan this site was allocated for visitor experience (which now covers recreation and tourism uses) and community use. The list of the potential uses is not included in this Plan. In order to present an accessible map-based approach the Plan cannot include the same level of detail on the potential uses in a table format. However in order to address this issue there is an opportunity to clarify the potential uses of this site by annotating the map, in the same way a number of sites such as Arrochar MU1.

Minor modification proposed to annotate the proposals map for Succoth MU2 to provide further details of potential uses, constraints and opportunities i.e. low

intensity development, retain element of open space for local and visitors to use for passive recreation, biodiversity enhancement and consideration of flood risk.

Arrochar ED1: Church Road

There were five comments from Sportscotland, Community Council, Scottish Natural Heritage, SEPA and Scottish Water. The statutory government bodies wish clarification on flood risk, landscape and loss of the outdoor sports facility. The Community Council wish an alternative site opposite the Cadet Centre to be allocated.

Summary of Recommended Response

The alternative site across from the Cadet Centre is not considered a suitable site due to landscape sensitivities and being too distant from Arrochar and Tarbet centres and facilities. The proposed site is already allocated in the Adopted Local Plan which contains the mountain rescue and fire station which are compatible with industrial and business uses. The access to the A83 Trunk Road is nearby and there is no impact on residential areas.

Scottish Natural Heritage recommends a landscape assessment icon is included on the map given this issue was highlighted in the Strategic Environmental Assessment. This was responded to by restricting the site area to the break of slope and it is not therefore considered necessary to include a landscape assessment icon. SEPA wish a flood risk assessment to be submitted with any planning application. The flood risk icon should be added to the proposals map.

The site contains an informal 'kick about' area with goal posts. As per the response on MU1 above, the site is not identified in the Argyll and Bute's Sports Strategy, therefore there is an excess of provision. **Minor modification is proposed recommending the inclusion a flood risk icon.**

Arrochar H1: Cobbler's Rest (12 homes) and Arrochar VE1: Ben Arthur

There was one comment received from SEPA in relation to potential flood risk. The Community Council also commented on the unsightly appearance of the site which is noted.

Summary of Recommended Response

The flood risk icon should be added to the proposals map. **Minor modification is proposed recommending the inclusion of the flood risk icon.**

Arrochar H3 – Church Road (6 homes)

There was one comment from the Community Council requesting that an alternative site across from the Cadet Centre be allocated. SEPA also comment in relation to potential flood risk from a minor watercourse.

Summary of Recommended Response

The alternative site across from the Cadet Centre is not considered a suitable site due to landscape sensitivities and being too distant from Arrochar and Tarbet centres and facilities. The site proposed is immediately adjacent to existing housing area with easy access into the centre of the village. The flood risk icon should be added to the proposals map. **Minor modification is proposed recommending the inclusion of the flood risk icon.**

Arrochar TR1 – Pier

There was one comment received from SEPA in relation to potential flood risk.

Summary of Recommended Response

There is currently no proposals map for this allocation. This was an oversight. A proposals map should be added and the flood risk icon used to highlight a flood risk assessment is required. **Minor modification is proposed recommending the inclusion of a Proposals Map for Arrochar TR1 and addition of the flood risk icon.**

Camping Provision in Arrochar and Succoth

One responder objects that the plan does not identify land for camping in Arrochar and Succoth.

Summary of Recommended Response

There are a number of sites allocated which could include visitor experience development, including MU2 and MU1 that could make provision for caravans or motorhomes and also possibly a campsite. The Plan's Visitor Experience Policy 1 also supports proposals within safe walking distance of a town or village so camping proposals could be supported on suitable sites surrounding Arrochar and Succoth should a planning application be submitted. **No modification is proposed to the Plan.**

BALLOCH (pp55-57)

Camping Provision in Balloch

One responder objects that the plan does not identify land for camping in Balloch.

Summary of Recommended Response

Balloch settlement map includes 4 sites for Visitor Experience (VE1-4). The sites identified for Visitor Experience may include tourism accommodation and/or facilities and this could include camping provision depending on the site and the proposal. Visitor Experience Policy 1 supports tourism proposals within safe walking distance of a town or village so camping proposals could also be supported on suitable sites surrounding Balloch should a planning application be submitted. **No modification is proposed.**

Balloch Site H1: North Craiglomond Gardens

There are two objections to this site on grounds of density, privacy, traffic/parking increase and residential amenity.

Summary of Recommended Response

The site is identified in the Adopted Local Plan as H5 Land north of Craiglomond Gardens for 8 homes. Planning permission was granted in 2007 for 8 two bedroom flats and, while lapsed, confirms the site is capable of the scale of development proposed. Through compliance with the Plan's policies in any future planning application, other concerns can be addressed. **No modification is proposed.**

Balloch Site MU2: Carrochan Road (Mixed Use Housing (23 Homes) and Car Parking)

There are two objections to this site, one from the Community Council on grounds of it being a valued green area providing amenity space for the community. It is also stated that car

parking is needed in Balloch and it should be used for car parking/recreation uses. SEPA also commented in relation to the potential flood risk from Ballagan Burn.

Summary of Recommended Response

It is agreed that this site could continue to contribute to car parking in Balloch and would form an appropriate use to compliment the adjacent National Park Authority offices in its civic building role. While this site currently provides informal green space, it is an established housing allocation with a lapsed planning approval for housing. Balloch Park is diagonally north west of the site and within a short walk and along with other land towards the River Leven are safeguarded for open space and it is considered a well-designed development could still ensure amenity woodland is safeguarded and there is a good provision of green space locally. The flood risk icon should be added to the proposals map. **Minor modification is proposed recommending the inclusion of the flood risk icon.**

Balloch Site VE1: West Riverside

One responder requests that the site boundary is reduced due to the impact of tree felling in Drumkinnon Wood and potential impact on wildlife. Scottish Enterprise – the site owner - wishes the site boundary to be extended for low density residential development that will help enable the overall tourism development of West Riverside. The actual area was not provided in a map or yet determined by the responder. Strathclyde Partnership for Transport considers a Transport Assessment should be required.

Summary of Recommended Response

The main area considered to be the focus for development is shown in the Proposed Plan although some lower density development could be possible in some of the wider area as this is within the Town boundary. The Natural Environment policies in the Proposed Plan will be used to ensure trees and wildlife are protected where necessary. It is agreed that a Transport Assessment should be required. In terms of extending the site to include more of Drumkinnon Wood, no defined area was provided for consideration as part of the plan preparation process. Until a planning application is submitted it is not possible to define what the site can accommodate other than tourism related accommodation and/or facilities. **Minor modification required to include a Transport Assessment icon to the site map.**

Balloch Site VE2: East Riverside

Sportscotland requests that reference is made to presence of outdoor sports facilities on this site. The owner of part of the western half of the site wishes it to be removed from the Proposed Plan and Scottish Natural Heritage states that the proposals map should also flag potential flood risk to be consistent with Strategic Environmental Assessment mitigation.

Summary of Recommended Response

Sportscotland's comments are based on aerial imagery, and it is not agreed there is a public outdoor sports facilities on this site. **Minor modifications are proposed involving an amendment to the site boundary to remove the section between the recreation ground and the River Leven in addition to an adding an icon to the Map to show a Flood Risk Assessment/Drainage Impact Assessment is required.**

Balloch VE4: Woodbank House

Three comments were received on this site citing concerns over noise impacts on the site from existing adjacent dog kennels, traffic increase on Old Luss Road, and the need for

substantial car parking provision, access, sewerage, drainage and flooding. One other comment is supportive of the site and seeks the inclusion of additional adjacent land for housing and visitor experience uses.

Summary of Recommended Response

This site is an existing allocation in the Adopted Local Plan and presents an opportunity to bring this building, included on the Buildings at Risk Register, back into use as part of a new development. The issues raised are all capable of being addressed in the consideration of a planning application through compliance with the Plan's policies. Regarding traffic and access, no objections were received from West Dunbartonshire Council Roads Department.

No modifications proposed

Turning to the proposed additional site, it is too late in the plan preparation process to introduce a new site particularly when a range of sites are already identified. There were opportunities to put forward sites at the Call for Sites stage in 2012/13 and at the Main Issues Report stage in 2014 which allowed all sites to be fully appraised and consulted upon. However, proposals for sites that are not identified in the Proposed Plan will be considered against the criteria contained in Visitor Experience Policy 1 and associated supplementary and planning guidance. Pre-application advice may also be sought. **No modifications proposed.**

BALMAHA (p60)

Balmaha Site H1: Forestry Commission Site (15 homes)

There are three objections to this site with the key reasons being habitat, scale, need and impact on the rural character of Balmaha.

Summary of Recommended Response

This site has been assessed as suitable for development via a rigorous process which considered landscape, ecology, water environment and flooding. This included expert advice from our own specialists as well as Scottish Natural Heritage. It is not considered that development on this site would compromise the character or setting of Balmaha which by nature is a dispersed low density community. Draft Supplementary Planning Guidance for Buchanan South seeks to safeguard and maintain this character and it is considered that carefully designed and located development on this site could be satisfactorily absorbed in the landscape. There is evidence of affordable housing needs and this site has been identified following significant engagement with the community and partner organisations.

No modifications proposed.

Camping Provision in Balmaha

One responder objects that the plan does not identify land for camping in Balmaha.

Summary of Recommended Response

Whilst no land is formally identified in the Proposed Plan for camping in Balmaha this does not mean that camping provision is not desired or that it would not be supported by the policies in the Plan. Proposals for camping will be considered against Visitor Experience Policy 1 and the Planning Guidance on Visitor Experience which contains more detailed guidance on camping. **No modification is proposed.**

CRIANLARICH (pp62-63)

Crianlarich Settlement Overview

Tactran comment that while there are no current proposals, the plan should show support for a timber railhead in the village.

Summary of Recommended Response

The potential use of part of ED1 site for a timber rail/road transfer facility has been identified for some time. The continued identification for economic development uses is considered to be compatible with storage/transfer of timber. **No modification proposed.**

Crianlarich H1 – Willowbrae – Housing (6 Homes)

The above site was subject to four comments, two of support and two objections. The objections were requesting that the site not be allocated due to the physical constraints of the site, loss of privacy, noise pollution, flooding and road safety.

Summary of Recommended Response

This site presents an opportunity for new housing in Crainlarich which has few options due to various constraints. The issues raised are all capable of being addressed in the consideration of a planning application for a carefully designed development through compliance with the Plan's policies. Constraints such as drainage has been listed as a consideration on the site map illustrated by an icon requiring a drainage impact assessment to accompany any planning application. Stirling Council, as the Roads Authority, were consulted on the site and stated that any access would have to meet minimum standards and would be an extension of an existing public road which no concerns were raised at this time for a development of 6 houses. **No modifications proposed.**

CROFTAMIE (pp64-65)

Croftamie VE1 – Piriehall – Visitor Experience p65

There were three comments regarding this site; an objection, a request for an alternative description and points of information. The objection to development was on the grounds of traffic increase and loss of amenity. Concern was also raised that the proposal was contrary to the aims of the National Park and to the Sandford Principle. Responders also requested the site's description on p65 includes housing.

Summary of Recommended Response

The site is allocated for Sustainable Tourism in the Adopted Local Plan. Some housing use would help provide for the refurbishment and restoration of Pirnie Hall which is included on the Buildings at Risk Register. The principal land use will be Visitor Experience, however an element of housing development may be supported to enable the regeneration of the building and this is already stated on p64. **No modification proposed.**

Croftamie H1 – Buchanan Crescent – Housing 5 homes p-65

There were three comments for this site; additional icons to be added and points of information. SEPA requested a flood risk assessment for any proposal. Scottish Water highlighted the limited capacity at the Croftamie Works.

Summary of Recommended Response

The updated responses from SEPA and Scottish Water are acknowledged. **Minor modification proposed to add a Flood Risk Assessment icon to site map.**

DRYMEN (pp66-69)

There were 19 responders in total relating to Drymen. Most of the comments related to the inclusion of site H2, Laurelfields, proposed for 10 homes. There were also some comments suggesting that as a whole, Drymen has too much land for new homes and that other villages of the same size did not have to accommodate as much development.

Drymen H1: Stirling Road – Housing and Car Park (36 homes)

Four responses were received to this site. Support was shown by MacTaggart and Mickel who highlighted that the site currently has planning permission for 36 homes. Some other comments consider that the site should ensure the car parking element of the site is at least of the same size/provision as what is currently onsite. There were also some objections to the site saying that the density is too large for Drymen and would create road safety issues.

Summary of Recommended Response

As the site is an existing allocation in the Adopted Local Plan and has a current planning permission and it is considered that it remains a key development site and should be included in the Local Development Plan. **No modifications are proposed.**

Drymen H2: Laurelfields – Housing (10 homes)

The site was subject to 17 responders submitting their comments. Drymen Community Council wish to see the allocation reduced to 5 units. Objections were made to the site for one or more of the following reasons:

- Conservation Area - the development would result in an unacceptable impact on the Conservation Area and against the Conservation Area Appraisal.
- Density - the proposed density is too large and not in keeping with the surrounding area.
- Road Access/Safety - the type of development proposed would create access and road safety issues.
- Service Capacity - local services and infrastructure could not cope with the scale of development. It is noted that Scottish Water states that there is capacity from waste water treatment works for development of the site.

- Landscape - due to landscape sensitivity, the proposal would be unacceptable, it is also contradictory to the 2009 National Park Authority commissioned landscape capacity report for Drymen¹.
- Impact on Visitor Experience - development of the scale proposed would have a detrimental impact on both visitors and current residents to the area.
- Physical Constraints - site is physically constrained and could not accommodate the proposed number of houses.
- Community Consultation - support which was shown by the community at the Local Development Plan Charrette was for 3 homes and not the number proposed. Also the weight of opposition should mean that the site should not be allocated in the Plan.
- Historic Environment - development will result in a detrimental impact on the nearby listed buildings and their setting.
- Sandford Principle – allocation of the site will lead to development which does not reach the National Park’s Statutory Aims.
- Priority should be given to other sites - other sites in the village have more merit to be developed in the first instance as they will have less impact.
- Surrounding context - allocation of the site will lead to development which is not “in-keeping” with the southern end of the village.
- Volume of house building proposed in Drymen - this site, along with the other housing sites proposed in too much in scale for the village.
- Proposed Design - the proposed design does not fit with the current context of the village, mainly the southern end which has low density housing with large gardens.
- Density of other sites recently developed - other sites in the village of a similar size have not have to accommodate the same density.
- Impact on Natural Environment - there would be an unacceptable impact on the natural environment which is contrary to the Biodiversity Action Plan Wild Park 2020.

Summary of Recommended Response

While the sensitivity of this site is recognised, as a gap site within the Village, it remains officer’s view that appropriately designed and scaled housing development can be achieved without undermining the character of the Conservation Area or resulting in negative impacts on this part of the Village. It is worth highlighting the number of homes proposed has reduced from 16 to 10 in the Proposed Plan and the overall site area has been reduced, in light of community concerns, while still trying to ensure a viable scale of development. Additional advice (in the form of annotations) on the main planning considerations for this site has also been included within the site map in the Plan.

The site is clearly at a sensitive and important location within the Conservation Area and will require to be well integrated into the streetscape in terms of scale, massing and materials.

Infrastructure or service capacity issues have not been raised by Stirling Council as the Roads or Education Authority. Stirling Council Roads Improvement Service states that any development is required to meet their minimum standards and having reviewed the concerns raised also highlight that while development of 10 units would increase traffic, it would not raise concerns to level suggested by the consultation response. In terms of the question of

¹ Drymen and Gartocharn Landscape Capacity Assessment February 2010
<http://www.ourlivepark.com/?wpdmdl=2376>

'need', the advice from the Council – as housing authority – as well as our own analysis is that there remains a need in the Village. This site is identified within Stirling Council's Strategic Housing Investment Plan and has funding allocated within the Council's programme. This new site has also been included to offer flexibility of choice of development sites in Drymen which despite the need has seen no notable housing development built for a number of years.

As with all communities in the National Park, development proposals will require to be of a scale that can be accommodated but also support the future needs of the community by providing a range of housing opportunities. The affordable housing proposed at Laurelfields (H2) and the other housing allocations in the village will play an important role in supporting the needs of Drymen households as a whole, and in delivering the wider aims of National Park to build strong sustainable communities. It should also be noted that there has been some development pressure adjacent to the boundary of Drymen which the NPA did not recommend including in the Main Issues Report as a reasonable alternative due to landscape considerations. **No modifications proposed.**

Drymen MU1 – Former Salmon Leap Economic Development and Housing (4 homes)

This site was subject to 2 comments. One comment requesting that the housing element should be removed from the allocation and the other comment showing full support for the allocation. SEPA requested a flood risk assessment for any proposal.

Summary of Recommended Response

It is felt that there is opportunity to have some housing on the site to help meet some of the demand in the area and is carrying forward the uses promoted in the Adopted Local Plan. Having this flexibility of uses makes the site more viable in the Local Development Plan period. **Minor modification proposed to add a Flood Risk Assessment icon to site map.**

Drymen LT1 – Long Term Housing (30 homes)

This site was subject to one response from the site owner which requested the site be changed from a long term site, to one which is deliverable in the Plan period (2017-2022). The responder feels that it would add to the housing land supply and the flexibility of housing land in Drymen. It is also highlighted that the responder feels that deliverability of the site would increase with change from a long term site to a short term site. The responder also highlights that putting the proposed housing site H1 and the long term site together (to create a larger housing site) will have a consolidated approach and provide wider community benefits including affordable housing and parking for cars and coaches.

Summary of Recommended Response

It remains the Authority's view – following consideration at the Main Issues Report stage that the long term allocation is appropriate for this site. Currently, 3 allocations for housing are proposed in Drymen which are considered sufficient for a village of this size. Consultation has indicated through the Charrette workshops that the community they would like to see sites situated in the village developed in the first instance, before looking elsewhere. Keeping this as a long term option would also ensure that housing sites within the village boundary are developed and not left as gap sites while sites on the edge of the boundary are being built out. This result would not be in line with the overall Plan Vision towards sustaining communities.

Difficulties with progression of allocated sites in Drymen are noted, however site H1 Stirling Road has a valid planning permission and there is no reason to believe that the site cannot be delivered as per the planning permission that exists. The National Park would always be seeking to assist in bringing forward sites with planning permission through working with site owners and key partners such as Local Authorities and Key Agencies.

The National Park Authority is required to look beyond the 10 year plan period and show the scale and location of where housing could be located which is why this site has been proposed as long term. **No modifications proposed.**

GARTOCHARN (pp71-72)

Gartocharn Site H1: Burnbrae Farm (10 homes)

The Community Council supports this site. There is one objection on road safety grounds and that there are other safer sites including (a) the field between Ardoch B&B and Ross Loan and (b) the traditional football pitch at the other side of the village. SEPA comments that a watercourse runs through this site [the watercourse does in fact run through land bordering the site's southern and eastern boundaries] and that this poses a potential risk of flooding. A basic Flood Risk Assessment will be required either prior to or in conjunction with any planning application and SEPA is likely to object to development unless appropriate additional information is submitted or the site plan is amended to remove the sections thought to be at risk.

Summary of Recommended Response

West Dunbartonshire Council has assessed this site (at Main Issues report stage) and has not objected on road safety grounds. The alternative site suggested at (a) was also considered at Main Issues Report stage but not considered suitable for development. The other alternative site suggested at (b) was not proposed for development at any stage in the plan preparation process and has therefore not been assessed for suitability as a potential development site within the Proposed Plan. With regards to flooding, SEPA's comments regarding flood risk are noted and a **Minor modification is proposed by adding an icon to the proposals map on page 72 to show that a Flood Risk Assessment is required.**

Gartocharn Site H2: France Farm

Kilmarnock Community Council supports this site, but highlights that a mapping amendment is required where the site shading overlaps Church Road.

Summary of Recommended Response

Minor modification proposed to amend mapping error.

Kilmarnock Cemetery extension

West Dunbartonshire Council states that there is a requirement for a cemetery extension at Kilmarnock Church and wish this to be identified or referenced in the Proposed Plan.

Summary of Recommended Response

As this site is in the countryside it is not identified as a formal allocation in the Proposed Plan which focuses on mapping sites within the boundaries of the Parks towns and villages only. It remains the Authority's view that any proposals for a cemetery extension could be

supported within the policy framework provided in the Proposed Plan. Pre-application advice has been offered. **No modification proposed.**

Proposed New Tourism Site

One responder promotes a new site for tourism uses (chalets) on land near Gartocharn, located in two fields lying to the east of the village (bounded by South Gartocharn Farm to the south-west, Middle Gartocharn Farm to the north-west and the War Memorial to the north-east).

Summary of Recommended Response

It is too late in the plan preparation process to introduce a new site. There were opportunities to put forward sites at the Call for Sites stage and at the Main Issues Report stage which allowed all sites to be fully appraised and for consultation on these, including neighbour notification, prior to the Proposed Local Development Plan stage. Therefore this proposal, if submitted as a planning application would require to be considered against the criteria contained in Visitor Experience Policy 1 and associated supplementary and planning guidance. Pre- application advice may also be sought. **No modification proposed.**

GARTMORE

One comment received requesting consideration of a site to the north of Park Avenue as suitable for six houses. The site had previously been assessed in 2013 (Call for Sites) and 2014 (Main Issues Report and Additional Sites). The assessment concluded that access to the site remained a significant consideration and should not be included in the Proposed Plan. The response includes an access statement which concludes that development of 6 homes would be viable.

Summary of Recommended Response

While additional information has been provided, it remains the Authority's view that this site is severely restricted due to the poor junction visibility at the main access. Concerns have been raised by the community previously and further community engagement would be required in any future consideration. The principle of housing at this location could still be considered via a planning application under Housing Policy 1 (b) as a site adjacent to the town boundary. **No modification proposed.**

KILLIN (pp73-74)

Village Boundary

One responder seeks a change to the village boundary around the south east corner of the village to reflect the Conservation Area boundary. This would include a property called Yellow Cottage and surrounding land.

Summary of Recommended Response

The area of land around Yellow Cottage (Category C Listed Building) is notably different to land within the village boundary in terms of its land use and undeveloped, historic character. This area also has a strong rural characteristic which is associated with its relationship to

Kinnell House and Estate, this is emphasised by the Gatepiers at the entrance to the Estate (Category C Listed Building) and the long driveway that leads past Yellow Cottage. **No modification proposed.**

Killin Site ED1: Roads Depot area

SEPA does not object in principle but state that this site is at significant risk of flooding and a Flood Risk and Drainage Impact Assessment are required.

Summary of Recommended Response

There is already an icon on the proposals map for this site which requires a Flood Risk Assessment, however it is **recommended that a minor modification** is made to the Proposed Plan by adding an icon to show that a Drainage Impact Assessment is also required.

LOCHEARNHEAD (pp78-79)

Lochearnhead overview

The overview text on p78 was subject to one comment in the consultation requesting that more camping provision should be made in Lochearnhead.

Summary of Recommended Response

Whilst no land is formally identified in the Proposed Plan for camping this does not mean that camping provision is not desired or that it would not be supported by the policies in the Plan. Proposals for camping will be considered against Visitor Experience Policy 1 and the Planning Guidance on Visitor Experience which contains more detailed guidance on camping. No modification is proposed. **No modification proposed.**

TARBET (p85 TO 87)

Transport (Tarbet village map, p85)

Transport Scotland commented in relation to the A82 Trunk Road upgrades.

Summary of Recommended Response

Minor modification recommended - reference to the proposed works on the A82 is added to the Placemaking Priority 'pop-out box' on Tarbet village map on p85.

Open Space (Tarbet village map, p85)

There were two objections in relation to open space allocations on private land and that the cemetery was not allocated as open space.

Summary of Recommended Response

The private open space in question is a small field and garden ground on Clanreoch Road. It is a suitable infill site (subject to suitable vehicle access). In relation to the cemetery it is recognised that it is a visitor attraction due to those tracking their ancestral past.

Minor modification is proposed recommending the allocation of Tarbet cemetery on p85 as open space and remove the area of open space allocated on Clanreoch Road, Tarbet p85.

Tarbet H1: Land South of A83 (10 homes)

This site was identified through the Charrette process at the pre-Main Issues Report stage. The Community Council and one individual now wish the site to be removed due to the impact on the mature trees. The community council mention the alternative site across from the cadet centre, considered in the earlier Arrochar section.

Summary of Recommended Response

As above, see Arrochar & Succoth, the cadet centre is not considered a suitable site due to landscape sensitivities and being too distant from Arrochar and Tarbet centres and facilities.

The Charrette Report identified the site given there was a lack of recognisable village centre and this site had great potential in readdressing the asymmetrical growth of the village. It is however recognised that the site is heavily wooded, particularly the eastern edge where there is significant ancient woodland features (upland oak woodland). The site from the current entrance westwards, comprises of younger broadleaf woodland encroaching into an agricultural field.

The density of 10 homes is low to take account of the site constraints and it takes account of the placemaking priority (road re-alignment and civic space). It is recognised that there would be tree loss due to development but replacement trees would be required to compensate the loss of woodland. There are other policies in the Plan that would require new tree planting, invasive species and woodland management to benefit the site. However, it is recognised that the eastern edge contains notable ancient upland oak woodland and therefore it is advised that this is made clear to the developer by reducing the size of the allocation to prevent the loss of the core ancient woodland on the eastern edge. The reduced site area has capacity to accommodate 10 homes so no change is proposed to this number.

Minor modification is proposed recommending a reduction in the size of Tarbet H1 to exclude 0.8 hectares area of ancient woodland from the proposed 2.53 hectare site. The new site area would be 1.73 hectares and the number of homes would remain at 10. In addition a minor modification is recommended in relation to the red line boundary.

Tarbet VE1: Tourist Information Centre

There was only one comment from SEPA received in relation to a minor watercourse running adjacent to the site.

Summary of Recommended Response

The comments from SEPA are acknowledged and in response a flood risk assessment icon should be added. **Minor modification proposed to add a Flood Risk Assessment icon to site map.**

Tarbet VE2: Central Green and Tarbet VE4:Lochside Frontage

There were three objections in relation to the protection of the open space, natural lochshore, mature trees and that the sites should be allocated as such.

Summary of Recommended Response

It is not envisaged that these sites could accommodate large scale facilities or accommodation given the site sensitivities. The site is currently allocated for 'Open space

and Recreational Tourism Uses' in the Adopted Local Plan, and is now proposed for visitor experience - although the intended uses have not changed. Visitor experience is wide ranging and can include low-key recreational/visitor facilities or infrastructure. There are also other policies within the plan that ensure that existing open space, landscape context, trees and flooding are taken into account. There are two core paths that go through the site including the West Lomond Cycle Route, which starts at this location and these would require to be retained.

It is acknowledged that in simplifying the style of the plan that the details of the potential uses are not included which may have caused the concern. In order to continue the accessible style of the Plan it is not proposed to include a list of potential uses in a table format. However to address this issue there is an opportunity to clarify the potential uses of this site by annotating the map similar to other sites in the Proposed Plan.

Minor modification is proposed recommending change to Tarbet MU1 – Mixed Use and Open Space to replace maps on p87. Insert an annotated version of the proposals map to provide further details of potential uses, constraints and opportunities i.e. key views out over Loch Lomond, linkages and access improvements to core paths, increase car parking provision, biodiversity enhancement, enhance and retain central open area, sympathetic scale and design, consider natural foreshore and mature trees, improve water access and potential for low key water based facilities such as launch facilities.

Minor modification is proposed recommending exclusion of Shore Cottage at the northern edge of Tarbet VE4 which is a private property and garden grounds.

Tarbet VE5 – Rear of Tarbet Hotel

One response was received from the community council in relation to flood risk and that the allocation should be for retail rather than visitor experience.

Summary of Recommended Response

The flood risk is known and the flood icon is included on the proposals map. The site is allocated for visitor experience which allows for a small element of retail ancillary to the primary use. The site is to the rear of the Tarbet Hotel and best used to extend that use as opposed to retail. **No modifications are proposed.**

Tarbet TR1: Pier – Transport Proposal

There were three objections for this allocation in relation to there being no requirement for a second pier and also concern over noisy water sports.

Summary of Recommended Response

It is recognised that the existing pier has been upgraded recently and supports the waterbus service. However, there is a need to enhance the water-based offering and it may be clearer if there was specific reference to enhancement of the water-based recreation offering rather than a particular need for a new or replacement pier. **Minor modification is proposed recommending amend the text in Appendix 1 Schedule of Development Site (p116) to state “Water-based recreational infrastructure” rather than “Tarbet Pier”. Also, the site should be mapped individually and icons added in relation to noise, landscape, flood risk assessments.**

TYNDRUM (p88 & 89)**Tyndrum MU1: Clifton – Mixed Use (Visitor Experience and Economic Development)**

The site in Tyndrum was subject to one comment. The responder requested that woodland on the site be listed as a consideration for any planning application for this site.

Summary of Recommended Response

The site map has additional annotations illustrating key points for developers to consider.

Minor modification proposed to include a woodland icon on the site map.

SECTION 4: Policies

OVERARCHING POLICIES

Overarching Policy 1: Strategic Principles, Page 93

SEPA recommend that this policy is updated to encourage waste hierarchy principles in line with the Zero Waste Plan objectives and Scottish Planning Policy. The Scottish Government state that the Proposed Plan should be amended to reflect the opportunities for digital broadband connectivity that exist in the National Park and encourage developers to explore opportunities for provision of digital infrastructure to new homes and business premises as an integral part of development.

Summary of Recommended Response

Minor modifications to the wording of Overarching Policy 1 are proposed to include an amendment to the third criterion under heading ‘A low carbon place by:’ on page 93 to read ‘Supporting the provision of waste reduction and waste hierarchy principles including prevention, reuse (e.g. Composting) or recycling’ and a change to the last bullet point under the last heading ‘A more connected place by:’ to read ‘Encouraging developers to explore opportunities for the provision of digital infrastructure to new homes and business premises as an integral part of development.’

Gartmore Community Council requests the Plan highlight specific details of sustainable transport and improve public transport times during peak tourism times.

Summary of Recommended Response

The Plan supports sustainable forms of travel and the National Park’s Core Paths Plan and Outdoor Recreation Plan as reflected in the vision section and transport policies. It is the purpose of Local Authorities Transport Strategies to provide more detail on sustainable transport measures. **No modifications proposed to Plan.**

Overarching Policy 2: Developer Requirements

The Scottish Government refers to Section 3F of the Town and Country Planning (Scotland) Act 1997 which requires that local development plan policies are designed to ensure all new buildings avoid a specified and rising proportion of the projected greenhouse gas emissions from their use... through the installation and operation of low and zero-carbon generating technologies.

The Scottish Government states that the section of this policy on ‘Climate Friendly Design’ should specify a proportion of the greenhouse gas emissions reduction required by the 2015 Scottish Building Standards to be met through the installation and operation of low and zero-carbon generating technologies. The policy should include at least one increase in the proportion.

Summary of Recommended Response

There are difficulties in terms of assessment, delivery and enforcement for this specific policy request as reflected in the Fifth Annual Report on the Operation of Section 72 of the Climate Change (Scotland) Act 2009. Whilst having a shared desire to reduce greenhouse gas emissions, the relationship between the roles of planning and building standards is

unclear. The new Scottish Planning Policy (SPP) no longer requires local development plans to incorporate a policy setting out specified and rising targets for carbon emissions in new built developments.

However, Scottish Planning Policy states: '18. The Climate Change (Scotland) Act 2009 sets a target of reducing greenhouse gas emissions by at least 80% by 2050, with an interim target of reducing emissions by at least 42% by 2020. Annual greenhouse gas emission targets are set in secondary legislation. Section 44 of the Act places a duty on every public body to act:

- in the way best calculated to contribute to the delivery of emissions targets in the Act;
- in the way best calculated to help deliver the Scottish Government's climate change adaptation programme; and
- in a way that it considers is most sustainable.'

National Planning Framework 3 (NPF3) requires planning to facilitate the transition to a low carbon economy and there remains a statutory requirement to comply with section 3F of the Act. The Proposed Plan can support practical measures that deliver reductions of greenhouse gas emissions through our Planning Guidance on Design and Placemaking. Such matters relate to orientation of buildings, passive solar design to reduce energy requirements, landscaping to reduce impact from prevailing winds, complementing existing topography to reduce impact from prevailing winds, design of roof to maximise benefits from solar technologies, light tunnels to reduce energy needs, and rain water storage for non-drinking uses.

It is not necessary for the policy to refer specifically to Building Standards as any building would require to comply with the relevant building standards at the time of development. New Planning Guidance content will be prepared to provide details of how to implement this policy prior to Plan adoption (end of 2016). Collaboration will be sought with the Scottish Government, Local Authorities and others to develop this guidance.

Minor modification is proposed to the policy wording to now read: 'Climate Friendly Design: demonstrate how proposed buildings will meet a reduction in greenhouse gas emissions through; a) minimising overall energy requirements through conservation measures, and b) incorporating 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.'

Minor modification is proposed to the policy for the Supplementary Guidance section on the same p94: last sentence to replace 'low carbon design documents' with 'reducing greenhouse gas emissions'. Note: Additional guidance will be provided within the Design and Placemaking SG on the requirement to provide an Energy Statement to comply with this part of the policy.

Overarching Policy 3: Developer Contributions

The Scottish Government recommends that the Developer Contributions Planning Guidance is made statutory to accord with Planning Circulars 6/2013 and 3/2012 which state that the methods and exact levels of contributions should be included in statutory supplementary guidance. Details of the locations and types of developments that will be required to make contributions should also be included in the Proposed Plan in line with Circular 3/2012.

Strathclyde Partnership for Transport request that the 'Transport Infrastructure' bullet point is amended to read 'Transport Infrastructure and Services (where appropriate)'.

Summary of Recommended Response

A minor modification is recommended by making the associated Developer Contributions Guidance statutory and by adding an additional sentence to state that 'Where planning obligations are used to secure developer contributions, these will be sought in line with the requirements of Circular 3/2012 Planning Obligations and Good Neighbour Agreements. **A minor modification to wording is recommended** to read 'Transport Infrastructure and Services (where appropriate)'.

Gartmore Community Council asks for reference in Plan to importance of communications, mobile phone reception and broadband.

Summary of Recommended Response

Plan Section 4 Policies includes support for development proposals for digital infrastructure under policies a) Overarching Policy 1 Strategic Principles and b) Telecommunication Policy 1. **Minor modification proposed to amend last sentence under 'Our rural economy, Overview' on p.27 to read: 'Agriculture, forestry, tourism and modern telecommunications infrastructure are the backbone to our rural economy.'**

HOUSING POLICIES

Housing Policy 2, Page 96 Housing Land Supply

The Scottish Government, whilst not challenging the annual target of 75 new homes per year, states that the Proposed Plan should show how this target is derived from evidence contained in the constituent four Local Authorities Housing Need and Demand Assessments (HNDA). One responder states that the Proposed Plan is over-reliant on windfall (unplanned) development and that additional effective sites should be identified for housing development (and proposes land in Balloch for this purpose).

Summary of Recommended Response

The accompanying Proposed Plan Population and Housing Background Report provides a detailed summary of the evidence base and shows how this has been used to determine the target of 75 new homes per annum. This includes the findings of the Housing Need and Demand Assessments of the four Local Authorities, however a **minor modification is proposed to includes additional commentary in Appendix One of the Population and Housing Background Report in order to present this relatively complex information in a more accessible and transparent manner.**

Windfall development accounts for a significant proportion of all housing development in the National Park, taking place on gap sites within towns and villages and in the countryside, reflecting the fact that the National Park is a large rural area. It is reasonable to plan for this type of development and to make an allowance for this coming forward in the future based on past trends and assumptions on future trends, in accordance with guidance contained in Scottish Planning Policy. **No modification proposed.**

Affordable Housing Definitions

Two responders state that the definition of affordable housing is not broad enough with one stating that policy should promote self-build in certain locations to offer wider housing opportunity.

Summary of Recommended Response

The Proposed Plan seeks to promote and facilitate more opportunities for a range of different types of affordable housing, including self-build. Whilst it has no specific policy on self-build, the policies are designed to enable opportunities for self-build to come forward, specifically in the rural area within the small rural communities and building groups in the countryside (see part 2(c) of Housing Policy 2). By supporting only affordable housing in these areas it is hoped that planning policy will help people/communities to access land at a reasonable price and facilitate new affordable housing solutions, such as self-build. **No modification proposed to the policy however a minor modification is proposed to the Housing Vision text on Page 24 of the Proposed Plan to include a reference to include self-build.**

Affordable Housing Requirement and Commuted Sums

Three responders commented on the affordable housing percentages required in the Proposed Plan, stating that the requirement for affordable housing contributions of 33% and 50% will significantly affect development viability and are inconsistent with Scottish Planning Policy Paragraph 129 (which states affordable housing contributions should generally be no more than 25% of the total number of houses). One responder states that flexibility is vital in the application of this policy. Another responder objects to Housing Policy 2(ii) (which requires new housing on sites of up to three homes in the accessible rural villages area to be affordable or that a financial contribution is made) on the grounds that it is impractical to build an affordable home for 3 or less units.

Summary of Recommended Response

The Proposed Plan requires an affordable housing contribution of 25% in the remote rural area villages of the National Park however within the more pressured accessible rural area villages either 33% or 50% is required. This approach was consulted on at Main Issues Report Stage and the percentages set reflect feedback from stakeholders including the housing authorities. 33% is consistent with the adjoining Stirling Council LDP approach and the Local Housing Strategy which shows significant need and demand.

The 50% requirement only applies to the Loch Lomondside Villages and replaces the current local needs policy which has been in place for over 30 years. The Loch Lomondside area faces strong pressure for second, holiday and retirement homes yet is within easy reach of Glasgow so also faces commuting demand. Housing pressure in this area is particularly strong in comparison to the rest of the National Park and it is considered that a bespoke planning approach is still required. Land values in this area are currently suppressed due to the local needs occupancy policy, the removal of this and replacement with a new policy requiring 50% affordable/50% open market is considered to offer an uplift in land value in this area and should not stifle development. This has not been objected to in the comments by other landowners and developers in the Loch Lomondside villages.

This is also the justification for Housing Policy 2 (a)(ii) which applies to only the towns and

villages in the accessible rural area. Development on small sites accounts for a significant proportion of all housing development and it is considered necessary and appropriate to introduce guidance on this allowing the option of either providing an affordable house or a commuted payment to be used towards affordable housing elsewhere in the local area.

The need for affordable housing provision within the National Park is significant and evidenced. It is important that planning policy takes a stringent approach to help redress the balance and mix of housing in the National Park and create more opportunities for young and working age families. This is a core component of the strategy to address predicted population decline. In this respect it is necessary to set higher affordable housing requirements. However, the challenges of delivering affordable housing within a rural area are recognised, therefore in all cases a flexible approach to these percentage requirements will be applied. This is addressed in more detail in the accompanying Supplementary Guidance on Housing. **No modifications are proposed.**

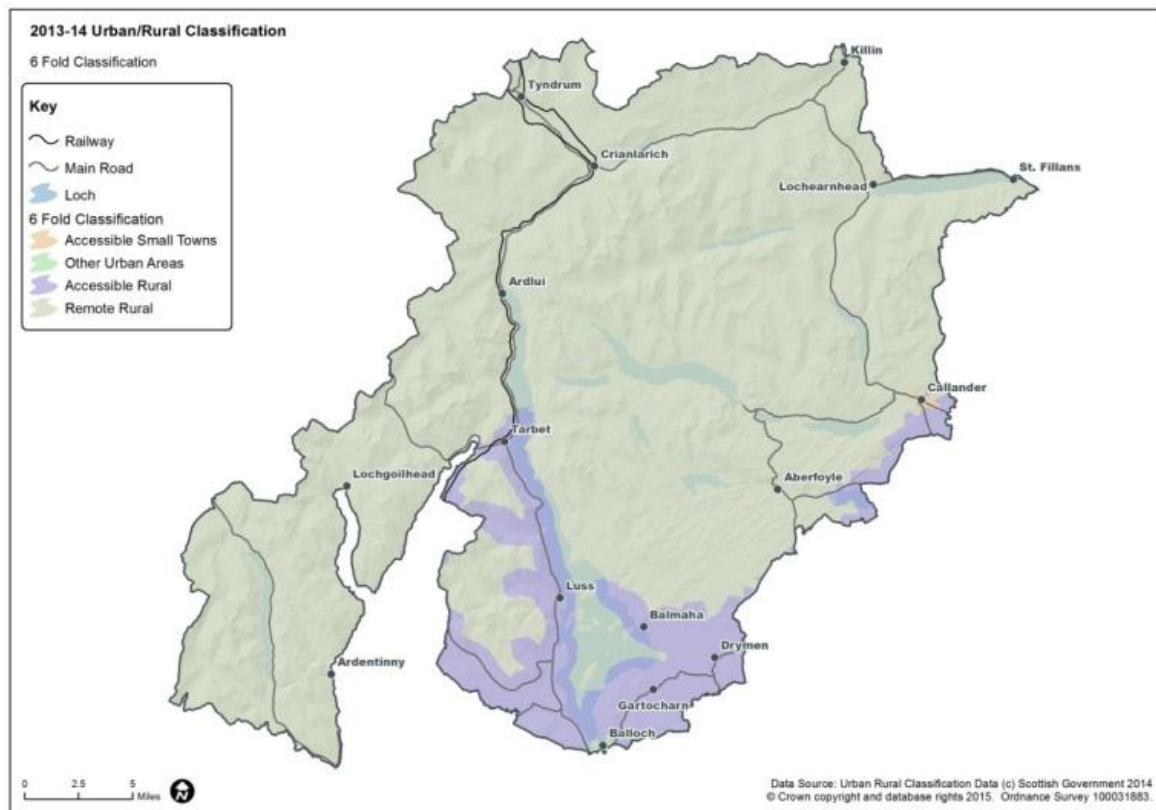
Housing Outside Towns and Villages

The Scottish Government comments that the approach to new housing in the countryside is more restrictive than that set out in Scottish Planning Policy, which states that in remote rural areas plans should allow the construction of single houses outwith settlements where appropriate. The Proposed Plan should either be amended to allow some flexibility in rural areas or provide justification as to why such development is not appropriate in the National Park. The reference to occupancy conditions tying new housing in the countryside to an established rural business should be removed. One other responder states that mixed tenure development is more appropriate than single tenure affordable housing development in these locations.

Summary of Recommended Response

The Scottish Government's Urban/Rural Classification mapping is a useful tool in helping to show the accessibility of rural areas and remote/fragile areas. The 6 fold classification mapping is shown in the Proposed Plan Background Report on Population and Housing and also in Figure 1 below. This classifies areas of the National Park as being accessible or remote rural.

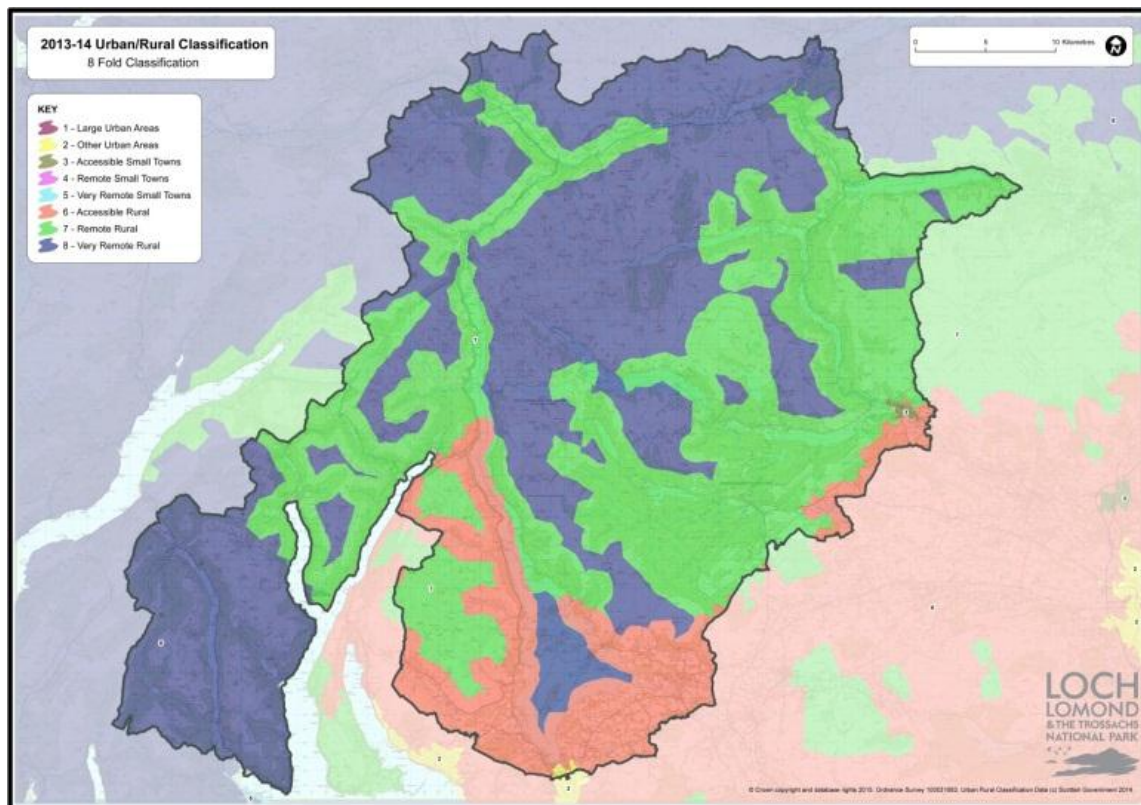
Figure 1 Urban/Rural Classification (6 Fold)



Proposed Plan Housing Policy 2 differentiates between accessible rural and remote rural in part (a) of this policy which applies to new development in the towns and villages (higher affordable housing contributions are sought in the towns and villages within the accessible rural area as well as commuted sum contribution/or affordable house on small sites). However, there is no differentiation between the accessible and remote rural areas in parts (b),(c) and (d) of the policy which apply to the countryside. This is because all of the countryside area of the National Park experiences strong housing demand (commuting, second, holiday, retirement or 'lifestyle change' homes). Planning policy seeks to allow new housing in the countryside but to focus this on affordable housing provision, for example self-build.

The 8 fold Urban/Rural classification categories accessibility in more detail and this can be used to help further justify the Proposed Plans approach to new housing in the countryside. The 8 fold classification distinguishes the remote rural area as being either 'remote rural' or 'very remote rural', as shown in Figure 2.

Figure 2 Urban/Rural Classification (8 Fold)



It is considered that the majority of the area shown as remote rural (green) is actually more similar in character, and experiences similar challenges, to the accessible rural area than very remote rural. Much of this area, especially the Stirling Council part of the National Park, is within commuting distance of Glasgow and Stirling and experiences strong housing demand. This is evidenced in the housing market analysis undertaken in October 2013 and published with the Main Issues Report. Of the very remote rural area shown, the bulk of this is mountains/lochs with the exception of the southern Cowal part of the Park which experiences demand for second, holiday and retirement homes. Therefore, whilst the *nature of demand* varies across the National Park, the *strength of market demand* is consistently strong.

The strategy for new housing in the countryside is to focus on using planning policy to facilitate opportunities for new affordable housing in the countryside, not open market. This can be justified as follows:-

Part (b) of the policy relates to sites located either adjacent or within very close proximity to towns and villages. Otherwise known as an 'exceptions policy' this allows planning permission to be granted for affordable provision on sites that would not normally be used for housing. This accords with Scottish Planning Policy and is not being challenged.

Part (c) of the policy relates to new housing in the small rural communities and building groups in the countryside and requires that all new housing must be affordable (in some instances open market housing may be supported where this is essential as enabling development to support the delivery of affordable housing). This is to reduce land values in order to enable more people to access land and build new affordable housing. It is hoped that this will enable more people and/or communities to access land for projects, such as affordable self-build.

To relax this part of the policy and allow open market housing in the small rural communities and building groups in the countryside is most likely to make access to land and affordable housing provision extremely challenging. In this instance planning policy is being used positively as a tool to try and support more inclusive and sustainable communities, directly supporting the achievement of the National Parks fourth aim.

To comply with part (d) (which relates to new housing in the open countryside) a household must demonstrate a connection to a rural business. As stated above, it is considered that the countryside area is best described as accessible rural. Whilst Scottish Planning Policy states that planning authorities should *avoid* the use of occupancy restrictions on new housing in accessible rural areas, this guidance needs to be interpreted carefully within the National Park context. It is not a fragile or a remote rural area, it is a highly scenic and accessible area lying on the edge of the main central conurbation. Given the significant pressure for new housing in the countryside the planning policy approach has historically been cautious and restrictive. It is still considered necessary to continue this robust approach and to seek to control the occupancy of new housing, via conditions, within the National Park. There is always the option, should circumstances change, to vary the condition at a later date and this would be considered on a case by case basis. This approach directly contributes to maintaining and strengthening a robust and strong rural economy where the relationship between people living and working on land is supported and encouraged.

No modification is proposed to the policy however it is considered that the Proposed Plan Background Report on Population and Housing should be amended to incorporate analysis and further justification of this approach, including the 8 Fold Urban/Rural Classification.

VISITOR EXPERIENCE POLICIES

Camping Provision in the National Park

There are three objections concerning the lack of guidance, clarity and support for camping provision in the Proposed Plan and the lack of integration between the Proposed Plan and the 'YourPark' work currently being undertaken by the Authority (which involves identifying where new camping provision, and investment in this, is required). Other comments received relate to more detailed matters and these will be considered as part of the review of the Planning Guidance on Visitor Experience, which is a separate process to the Proposed Plan examination.

Summary of Recommended Response

The Proposed Plan includes camping in its vision (page 13) and provides commentary on this in the section that describes how this vision will be delivered (page 21). Camping provision is currently being looked at in a strategic manner across the whole of the National Park as an action arising from the 2012-2017 National Park Partnership Plan ('YourPark'). As such, it is not agreed that the Plan should identify specific sites for camping at this time. The drive for the Your Park project is from a visitor management perspective which will be supported by a mixture of public and private capital investment in facilities. It is agreed that the Proposed Plan does need to provide support and guidance for this investment when it

reaches the planning stage. **A minor amendment is recommended to Visitor Experience Policy 1 criteria (g) to read ‘development which will help deliver a *Visitor Management strategy or action identified in the National Park Partnership Plan*. The accompanying Planning Guidance will be used to provide planning guidance on camping in the meantime.**

Visitor Experience Policy 1: Location and Scale of new development, Page 98

There were three objections to this policy. One regarding wording detail (minor) and one from Gartmore Community Council objecting that Gartmore and the surrounding area are not included in the zones shown as having small scale tourism potential on the Development Strategy Map on Page 19 of the Proposed Plan. One responder objects to the zones that are identified as having potential for small scale tourism development in the countryside on the basis that this means little area is available for new campsites.

Recommended Response

A minor wording change is proposed to Part (i) of the Policy so that it reads ‘the benefits that development would bring to the local economy *and/or the local community*’.

No change is proposed to the zones identified in the Proposed Plan as having small scale tourism potential. These zones reflect the approved National Park Partnership Plan to which the Proposed Plan must accord (National Park Plan Rural Development Policy 2: Spatial Development Strategy Part (c)). Tourism related proposals in the Gartmore area will be considered against Visitor Experience Policy 1 Parts (d) to (g) which do allow scope for further development. Proposals for new camp sites will also be considered against this policy which does not limit new camping to just the zones identified in part (b) for small scale tourism potential in the countryside. Outwith these zones proposals for new camping would be considered against the other criteria set out in the Policy. **No modification proposed.**

NATURAL ENVIRONMENT POLICIES

Natural Environment Policy 1: National Park Landscapes, seascape and visual impact

The Scottish Government states that, to avoid potential ambiguity, the Proposed Plan needs to differentiate between ‘wild land areas’ and ‘areas of wild land character’, making it clear that only the former are identified in the Scottish Natural Heritage 2014 wild land areas map referred to in Scottish Planning Policy.

Summary of Recommended Response

The context for this policy in relation to wild land character is set out in the National Park Partnership Plan in ‘Con Policy 3: Landscapes’ in which criteria a) states ‘*that priority will be given protecting the relative wildness of the National Park, specifically the core areas of wild land character.....*’ Map 2 on Page 21 on the Partnership Plan maps relative wildness and core areas of wild land character. While the requirement of Scottish Planning Policy is recognised, the Plan is required to be consistent with the Partnership Plan. For clarity, a footnote could be provided to be clear on the context of this policy.

Minor modification proposed to add a footnote to the Natural Environment Policy 1 that states; ‘Scottish Planning Policy only applies to wild land areas as defined in the Scottish Natural Heritage 2014 wild land areas map. Out-with wild land areas wild land character is a descriptive term that does not relate to wild land areas as discussed in

the Scottish Planning Policy but does relate to areas of wild land character as identified in the National Park Partnership Plan.'

Natural Environment Policy 12: Surface Water and Waste Water Management

SEPA requests wording changes to this policy to reflect its role. SEPA also objects to the wording of part (a) of this policy and wish the Proposed Plan to be clear that if development is in a sewered area (or area served by Scottish Water's sewer) it must be connected to the public sewer.

Summary of Recommended Response

Minor modifications are proposed to this policy to reflect SEPA's requirements and role. Specifically it is proposed to amend part (a) of the policy to read 'If the public sewerage system cannot be developed due to technical constraints or the connection is unacceptable to Scottish Water, then a private system may be permitted. This would be subject to the system not creating or exacerbating an environmental risk, including cumulative impacts with other developments.'

Natural Environment Policy 13: Flood Risk

The Scottish Government requests a minor wording change to ensure this policy accords with the flood risk framework set out in Scottish Planning Policy.

Summary of Recommended Response

Minor modification to the policy proposed by adding the words 'to achieve a neutral or better outcome'.

Natural Environment Policy 14: Marine and Inland Aquaculture

SEPA objects that this policy is not clearly linked to Policies 11 to 13. Sportscotland requests that Natural Environment Policy 14 also refers to the adverse effects of aquaculture on recreational and leisure activities as a policy criterion. One responder objects to the lack of a separate policy specifically on fisheries in the Proposed Plan and states this is necessary to address conflicts between established fisheries interests in land and new developments.

Summary of Recommended Response

A separate fisheries policy is considered unnecessary as the point made by the responder is adequately addressed in Natural Environment Policy 11: 'Protecting the Water Environment' and in Overarching Policy 2 'Visitor and Recreational Experience' through safeguarding access rights. Sportscotland's concerns are also addressed by the same Overarching Policy 2. In terms of Scottish Environment Protection Agency's comment, it is not agreed that there is any need to link policies 11 and 13. The majority of planning applications are assessed on numerous planning policies, in that, it is impossible for every policy to address every permutation in assessing a proposed development. The Scottish Government have requested that Local Development Plans be concise map-based documents to convey proposals in an accessible way as per Planning Circular 6/2013 paragraph 79. In order to continue the concise and accessible style of the Plan it is not possible to repeat policy criterion throughout. **No modification proposed.**

Natural Environment Policy 15: Coastal Marine Area

The Scottish Government requests minor wording changes to this policy.

Summary of Recommended Response

Minor modification to the policy part (a) to read 'Is in alignment with the National and Regional Marine Plan policies and objectives'.

Natural Environment Policy 16: Contaminated Land

SEPA caution the use of the term 'Contaminated Land' as this term has specific implications under Part IIA of the Environment Protection Act 1990. To avoid confusion, SEPA suggests the term 'Land Contamination' instead.

Summary of Recommended Response

Minor modification to wording is proposed to replace the term 'Contaminated Land' with 'Land Contamination' instead.

RENEWABLE ENERGY POLICY

Renewable Energy Policy 1 - Renewable Energy within the National Park, Page 109-110

This policy covers new renewable energy projects within the National Park - wind energy, hydro energy, biomass and biogas (heat and power). There were various comments of support which is welcomed. There were 5 comments from government bodies including Scottish Government, SEPA, Scottish Natural Heritage, Stirling Council and Sportscotland. There were also 2 comments from McLaren Leisure Centre and Mountaineering Council of Scotland. There were no comments from individuals. The comments were either in support or seeking small amendments. The main comments related to the biomass and biogas section. There were also comments about landscape impacts from access tracks in relation to hydro schemes.

Heat Mapping

There were comments from both Scottish Government and SEPA in relation to co-locating development with high heat demand to sources of heat supply and also undertaking heat mapping. This is required by Scottish Planning Policy.

Summary of Recommended Response

Heat mapping has not yet been undertaken for the Park's area although this will be considered along with partner local authorities as part of the future update to this Plan. The potential opportunities for both new sources of heat and where the demand may be have been considered within the context of new development.

The Callander South area is the only major area of growth identified in the Plan. The Callander South Masterplan Framework states that there is an opportunity for a community heating scheme and this could be linked to the neighbouring secondary school and leisure centre. There is also an opportunity identified in relation to the residual heat from the approved biomass plant that will be operational in 2017 (Killin RA1, Acharn, Rural Activity Area). The Killin description box on p73 states "...additional land for economic development at the proposed Acharn Biomass Plant site located between the village and Lix Toll. This is an opportunity to utilise any surplus heat from the Plant for workspace, business and light industry uses."

In addition the Design and Placemaking Guidance - zero and low carbon energy p61 recognises combined heat and power as a low carbon technology.

It is therefore considered that the Proposed Plan has looked at the potential for co-locating developments with a high heat demand with sources of heat supply.

Minor modification proposed including:

- **Add the following text to Overarching Policy 1, p93, under "A low carbon place" bullet 2, "connecting or creation of opportunities to shared heating schemes."**
- **Add a fourth bullet point to Callander overview on p44; "support opportunities for co-locating development with heat demand to sources of heat supply."**

Other comments

Sportscotland wish the policy to mention communities to recognise sport and recreation interest groups. The policy already covers recreation and access interests as well as residential amenity. Therefore, the potential impacts from renewable energy projects in relation to sport and recreation interest groups will be considered as part of the planning application process. In addition, the issue is addressed by Overarching Policy 2 'Visitor and Recreational Experience'. **No modification is proposed.**

Scottish Natural Heritage wishes European sites to be considered in the supplementary guidance. McLaren Leisure Centre wish a change to the biomass criteria to be amended as it is unrealistic to expect a biomass proposal to be located in close proximity to the source of fuel.

Summary of Recommended Response

The following **minor modifications are proposed including:**

- **Renewable Energy Policy 1, p110- Biomass and Biogas Energy (Heat and Power). Reworded as follows:**
"Proposals will be supported where they:
 - a) are located in close proximity to the source of demand for the generated heat and power, and**
 - b) use a sustainable source of fuel, locally supplied."**
- **The new renewable energy planning guidance will be updated to include the text currently contained in the adopted renewable energy SPG in relation to European sites as requested by Scottish Natural Heritage.**

Access tracks

Renewable Energy Policy 1, criteria d) states "*sufficient landscape measures are included to integrate the proposal into the landscape setting and reinstatement measures are taken to restore the physical conditions of the site when construction is complete*". However there is one response raising concern that this will not be achieved in practice.

Recommended Response

The renewables SPG contains detailed guidance on access tracks and landscape impacts and this will be revised and published with the Local Development Plan. The Development

Management team has also been monitoring hydro scheme construction extremely closely, working alongside the conservation team. This will ensure access tracks are durable and visually discreet. **No modifications are proposed.**

RETAIL POLICY

Retail Policy 3, Display of Adverts p109

One response was received regarding retail policy from Arrocher and Tarbet Community Council. They requested that policy be expanded to include provisions on the display and appropriate attachment of business advertising signs; specifically concerning trees. The responder requested that businesses in the villages contain off-site advertisement to designated central areas.

Summary of Recommended Response

Policy states that applications for the display of advertisements will be assessed on their potential impacts on amenity and highway safety. With specific reference to signs sited near trunk roads, Transport Scotland has the power to remove signs they deem distracting or inappropriate. It is felt that the policy currently addresses these concerns. **No modifications proposed.**

OPEN SPACE POLICY

Open Space Policy 1 – Protecting Outdoor Sports Facilities

Sport Scotland was the sole contributor to the Open Space Policy section of the Proposed Local Development Plan consultation. It commented that it should be made clearer that planning applications affecting outdoor sports facilities - that are designated as Open Space in the Plan - will be assessed against Open Space Policy 1.

Summary of Recommended Response

It is felt that given the title of the policy reads, “Open Space Policy 1: Protecting Outdoor Sports Facilities” that this sufficiently clear to users of the Plan that the policy should be considered on all Outdoor Sports Facilities. **No modifications are proposed.**

MINERALS POLICY

Mineral Extraction Policy 1, Page 111

There were two responses to the Minerals Policy in the consultation. The changes requested include a change to the text from “New Mineral Extraction shall only be supported...” To read, “New Mineral Extraction shall also be supported”. SEPA also request that the policy meets their requirements, namely the Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended) (or CAR regs) and the Waste Management Licensing (Scotland) Regulations 2011 (or WML regs).

Summary of Recommended Response

It is accepted that the policy is restrictive. It is considered necessary to safeguard the special landscape qualities of the National Park. The policy only supports minerals in exceptional circumstances and it is for the developer at the planning application stage, to demonstrate such a proposal is acceptable. SEPA's concerns it is felt are addressed in Natural Environment Policies 12 and 14 and in the interest of having a map based concise Plan, repetition should be avoided where possible. **No modifications are proposed.**

SUSTAINABLE WASTE MANAGEMENT POLICIES

Waste Management Policy 2, Page 112

SEPA requested that the policy identify where new waste facilities would be supported. SEPA also raise objection to the policy unless it is modified to make reference to employment, industrial or storage and distribution uses' being acceptable for waste infrastructure. This would bring the policy in line with Scottish Planning Policy.

Summary of Recommended Response

SEPA's concerns are already addressed in Economic Development Policy 1 (page 97) of the plan which states that Development proposals for new or expanded business, general Industry, storing or distribution (classes 4,5,6) or waste management facilities will be supported where they are located in identified sites or appropriate gap sites within towns or villages.

SEPA also objected unless a minor modification is applied removing the requirement for a new waste facilities to be supported solely on the basis of local operational need to adhere to Scottish Planning Policy (SPP).

Minor modification proposed to add a note at the end of Policy 2 - *Economic Development Policy 1 also outlines locational considerations for new or expanded waste management facilities.*

Minor Modification Proposed. Part b) of the policy should be replaced read, "*The proposed provision of waste management facilities is required to meet shortfalls in waste capacity*".