

## Appendix 2 - Consultation comments and responses on the Design and Placemaking Guidance

### Scottish Water (145)

Please note that for any site appraisals, early engagement with Scottish Water is recommended. Scottish Water supports the section you have included on Water Management and would encourage early discussions with developers on their site requirements.

**Planning Response:** *Modification made to pg9 to change 'Who to involve' to 'Who to appoint' and add a new box on 'Who to involve' and in this list include the planning authority, community council, Scottish Water, SNH, Roads Authority and SEPA.*

### Scottish Government(185)

Improve the text of the first narrative paragraph beginning 'Energy use...' is not as strong as it could be on referencing the requirement for low and zero carbon generating technologies to be installed. The final sentence of that paragraph could be amended to replace the word 'should' with 'must'.

**Planning Response:** *Modification proposed to be made to p60 changing 'should' to 'must'. Also more narrative has been added and a list of exemptions about what types of buildings are required to include the technology.*

### Nick Kempe (662)

#### 7) Design Guidance – Boundaries (P42).

The section of the Design Guidance on boundaries rightly states that boundary barriers should be designed in accordance with the character of the National Park. There is NO reference to deer fencing, which although sometimes a permitted development, can be put up around houses in settlements or for non-agricultural or forestry purposes. The need for this is illustrated by the example below, the new boundary fence for Loch Venachar House, currently the residence of the convener of the National Park Authority, which appears to have replaced the wall which was included in the original site plans for the adjacent car park (Five Lochs Visitor Management Plan): To support the Park's access objectives the section on boundaries should include a statement about the importance of boundaries being compatible with access rights, provisions of gates and styles etc. I wish to object to the section in the Site Guidance on Boundaries in the Local Development Plan as it should refer to deer fencing (undesirable and unacceptable for residential properties) and access rights.

#### 8) Design Guidance - Caravan and Campsites (P71)

As pointed out above this contains no guidance on the siting of campsites. It should do. There is some generally sound advice in this section but this is not related to the categories of formal, semi formal and informal campsites for which there are likely to be different design considerations. This needs to be made clearer. There is no mention of the impacts of tents on ground vegetation which is strange given Your Park makes considerable play of impact camping on vegetation and how campsites might avoid this given that they tend to concentrate use on particular pitches. There has been a failure to join up the design guidance in the draft Development Plan with the Your Park proposals. LLTNP's illustrative campsite design, which accompanied its letter to Ministers, shows a campsite built on a hillside with wooden platforms. This appears to have been done by someone who has little experience of camping and is hardly a low key development. How campers will put in pegs

to platforms is not shown and there are a number of health and safety issues relating to ensuring the platforms remain in sound condition, have sufficient means to secure tents etc. The campsite created at Sallochay is a much better example of the type of facility needed and according to information provided by the LLTNP is extremely well used. I object to the Design Guidance as it should include guidance on siting, as stated elsewhere in the Plan, and clarify the design considerations of the different types of campsites. The LLTNP's thinking about campsite design appears to be at a very early stage despite its experience at Sallochay and Loch Lubnaig where there have been considerable challenges and costs associated with providing electricity and flushing toilets.

***Planning Response:*** *Deer fencing is not considered a major issue in relation to planning applications received. Most deer fencing would fall under permitted development rights. The sections currently reflect good examples with a few poor examples which is considered sufficient. No change is proposed to pg42.*

*The camping and caravan site layout guidance on pg 71 provides sufficient guidance to cover caravan and campsites. It is not necessary to split the advice into different campsite categories in this Guidance as it is concerned with design principals to be applied when determining site layout. Minor amendments have been made to page 71 which include the rewording the introduction to reflect the Local Development Plan's vision of supporting more places to camp and experience the outdoors as well as some additional explanatory wording to expand on some of the bullet points.*

#### SEPA (664)

We note that the supplementary guidance underpins the proposed Local Development Plan by providing further steer for prospective applicants on how to comply with policies on good design, placemaking and sustainability. Many of the topics covered within the document are therefore outwith SEPA's remit.

We welcome the emphasis provided in the Design and Placemaking guidance on the need to consider flooding and drainage issues associated with new proposals from an early stage. Although, we would recommend that more weight is placed on these considerations forming part of the site selection process. Given the complexity often involved handling these issues it is also helpful that developers are directed to an appropriate professional. However, it may also be useful to include 'drainage' within the 'Appraisal of Site' box on p.8 and 'drainage engineer/consultant' within the list of 'who to involve at what stage' on p.9 and p.10.

Within the 'Site and Area Appraisal Overview' we would recommend reference is made to the siting and design of development being informed by the natural flow paths of water through the site. We would also recommend that reference is made of avoiding impacts to Groundwater Dependent Terrestrial Ecosystems (GWDTE), which are specifically protected under the Water Framework Directive, within the section on water on p.26.

We would highlight that SUDS are mandatory under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended) (CAR). We do therefore welcome the emphasis placed on considering the disposal of surface water at an early stage. SUDS help to protect water quality and reduce potential for flood risk and also have the potential to offer the opportunity of enhancing the performance, amenity and appearance of the development if carefully integrated into the design. They are appropriate in both urban and rural situations.

Further information on this issue is available within our Planning Advice on Sustainable Drainage Systems. We welcome reference to de-culverting throughout the document as a potential enhancement measure for the water environment. We would also highlight re-naturalisation of channels; appropriate buffer strips to watercourses and removal or

modification of man-made barriers to improve fish passage and sediment transport as other potential enhancement options. All such proposals must include consideration of potential flood risk aspects. Further guidance is available within our Development Plan Guidance on the Water Environment and planning guidance on the Water Framework Directive including River Basin Planning. Please note that any proposals to undertake alterations to, or works on, the bank or bed of the watercourse constitutes an activity which requires to be authorised under CAR. More information on the regulations can be found at <http://www.sepa.org.uk/regulations/water/engineering> . We would recommend that this requirement is highlighted within the guidance. We note that p.45 of the guidance states that 'in most instances foul drainage will be discharged to the main sewage pipes'. We would advise that it is our preference, as set out within our Policy and Supporting Guidance on the provision of Waste Water Drainage in Settlements, that where a settlement is served by a public sewerage system that new developments should connect to the public sewer. We would recommend that this requirement is set out more explicitly within the guidance. Should a public sewerage system be unavailable, and a private solution therefore required, we would advise that it our preference that any new foul drainage discharge goes to soakaway if the ground conditions are suitable. Please note that the discharge of sewage effluent to the water environment, inclusive of groundwater, will require to be authorised by us, in accordance with the terms of CAR. It may be useful to state this within the document and encourage early engagement with SEPA. Further details on this matter can be found on our website [www.sepa.org.uk](http://www.sepa.org.uk) .

**Planning Response:** *Modification made to change 'Who to involve' to 'Who to appoint' and add a new box on 'Who to involve' and in this list include the planning authority, community council, Scottish Water, SNH, Roads Authority and SEPA. Other listed changes are proposed as modifications to pg26 and 45.*

## SNH (712)

Design and Placemaking The draft Supplementary Guidance is well laid out, graphically appealing and easy to follow and we are supportive of its aims and purposes. We are supportive of the approach advocated in this document, particularly in section 2.2, and would welcome reference to Green Infrastructure in the text and a link in Section 4 'Source of Information' to the Scottish Governments Green Infrastructure: Design and Placemaking.

We advise that section 2.2 titled, 'Spaces Between the Buildings' is renamed to reflect the breadth of this section and the importance of place making and landscape in the life of the park. The use of terms Landscape Architect and Landscape Designer in Overview of the Process (section 1) and Siting in the National Park landscape (section 2.1) could be confusing for the reader. We support the clearer approach taken in Section 2.2 page 37, where one term Landscape Architect is used, with reference to the relevant professional chartered institute. We advise that the definition given in the glossary for Landscape Character is incorrect and currently describes a Landscape Character Assessment. We recommend that it would be useful to include definitions for both Landscape Character and Landscape Character Assessment. The glossary of landscape terms on our website (<http://www.snh.gov.uk/protecting-scotlands-nature/looking-afterlandscapes/landscape-resource-library/glossary-of-terms/> ) has the following definition for landscape character: The distinct and recognisable pattern of elements that occurs consistently in a particular type of landscape.

**Planning Response:** *Modifications proposed as listed above. Section 2.2 has been changed to 'high quality places and spaces. The reference to landscape designers has been removed on pg 9, 10 and 30 (note, it is proposed to delete pg30 to avoid confusion and duplication).*