A development proposal to support housing, employment, tourism and economic growth within the rural village of Drymen, promoting quality and sustainability within a deliverable project.
BACKGROUND

This document has been prepared by ROCK DCM and is submitted to Loch Lomond and Trossachs National Park (LLTNP) Planning Authority in line with their public consultation stage of the Local Development Plan. This serves as an update and addendum document to an earlier proposal that was submitted during the Consultative Draft Local Plan (November 2008) consultation period.

Since the initial document was submitted in February 2009 the need to strengthen Drymen’s position as an attractive rural village capable of supporting itself going forward has become increasingly important. There is continuing evidence of a downward economic trend in the village with more shop closures and with a slow housing market generally the time is upon us to stimulate growth and movement. RBS made a commitment in 2010 not to make branch closures - they have not maintained this position and the status of RBS Drymen is a concern.

1 View at the Square
2 Alternative view of the Square
3 Vista created by Main Street to the Square
4 West facing views from the application site
5 Vista looking back to the Buchanan Arms Hotel from the viewing platform
6 Vacant retail units on Main Street - these businesses have relocated into the Square, which helps strengthen its economic cluster
7 Aerial photograph showing the application boundary in red.
This concise addendum focuses on an immediately deliverable project. The enclosed is a potential development opportunity that will strengthen and support economic development, and will have a positive impact on housing, employment, tourism, and the local economy by increasing the resident population.

We have consulted with Martin Heath Associates (MHA) in relation to the roads and transport proposals; and with CBRE in relation to the socio-economic condition and impact. With recent input from Savills who comment on the market and economic condition.

We are in dialogue with Mactaggart & Mickel, and Rural Stirling Housing Association about possible partnership working, both of whom are pleased to consider how we might move forward together to deliver the right accommodation mix and optimum solution for the village.

Drymen itself has to compete against other rural towns and villages. It has to offer something different, and something attractive to the market. Fundamentally the village has core key assets however these need to be strengthened to allow economic sustainability and prosperity for the future. This can only happen through investment and increasing the critical mass of inhabitants - enough to make a difference and retain the character of the village.

Q / Why have development sites currently identified within the local plan not progressed?

A / 1. The sites are not attractive to Developers
2. Sites are not attractive to the Market?
3. Both
4. People are opting to rent rather than buy into sites that offer nothing ‘special’. Do people (purchasers and public) not deserve to enjoy the special views and environment?

To stimulate market activity the correct sites have to be both identified and supported.

This site has proximity, access, views and vistas, topographical variance, landscaping opportunities, opportunity to create mixed tenure, and all within a world class setting that can differentiate itself from any other potential site.
HISTORIC GROWTH

The historic growth of Drymen radiates from the Square, which maintains its geographic position at the core of village activity. Initial expansion followed Main Street southwards towards the Church. Thereafter development generally took place north of the Square and ribbons developed along Stirling Road and the B837 towards Balmaha.

Main Street belies its name as a very low density street and given its location and proximity to the Square (as the commercial centre of Drymen), it is the logical and natural choice for future expansion.
LOCATION & OWNERSHIP

Main Street (B838) is the key arterial route through Drymen linking traffic from A811 Glasgow - Stirling with Rowardennan and the east side of Loch Lomond. The site occupies approximately 9.55 acres, or thereby, to the west of Main Street and has an elevated and recessed position. The site is within one ownership and there are no site assembly requirements to fulfill delivery of this proposal.
DRYMEN / RESPONSE TO DRAFT LOCAL PLAN

PUBLIC TRANSPORT

Road-based public transport (bus/ taxi) utilises Main Street and bus stops are located as highlighted over. These would lie within reasonable walk distance contours and provide adequate opportunities for public transport trips. Additional bus stop locations may be desirable. There is scope perhaps to increase the timetable/ services to accommodate future development to encourage broader usage. We would further analyse this through a Travel Plan.

TOPOGRAPHY

The site has topographic variation rising up from Main Street to a crest and falling towards Loch Lomond. This creates good opportunity for views to and from the site, and minimising visual impact of any development from Main Street. The site is discrete and hidden, and provides good opportunity for an integrated landscape strategy that can offer visual and environmental enhancement to Main Street through subtle entrances and gateways.
ACCESS

Proposed vehicular and pedestrian accesses to the site are from Main Street where we seek to establish the principals of two secure access points to the site, setting out the intention of their hierarchy. The detailed entrance design will follow in the coming stages of detailed design through form, materials and landscaping. These accesses are proposed from Main Street without losing or compromising the character, and will provide good connection for residents and visitors.

Vehicular Movement

V1
Point V1 gives an entrance to the main part of the site at a logical access point 189m from the Square. An access at this point may run in parallel to the existing pedestrian access, might be screened through landscaping and through design at the detailed stage be considered within the overall context of a point of ‘arrival’ within an estate.

This access could support up to 99 units.

V2
The existing access V2 might serve a potential sub-zone to the main site, which may be appropriate for a courtyard/terrace key worker accommodation/affordable housing.

PEDESTRIAN MOVEMENT

P1
P1 is an existing path leading to a landscaped viewing platform that has views to Loch Lomond and the western hills.

We seek to upgrade the path and to reconfigure the termination point by potentially introducing a more formal viewing platform. The structure will allow orientated views at a greater vantage point and better opportunity to appreciate the view. The refinement of the design will be further explored during the coming months intandem with the wider development. The Glenfinnan monument is a well-known precedent - a potentially iconic structure for a world
class view. This is for further discussion with LLTN and Drymen Community Council.

DESIGN QUALITY

Drymen has an intrinsic quality and character that should be embraced and enhanced. The site itself is in a location that is difficult to rival and deserves high quality design and materials palette that will look good and perform well in 20, 40, 80, 100 years time. From the outset the aspiration is to establish quality, within a cohesive approach to design. The interconnection of spaces should be linked through well considered design and encourage movement throughout the site and village. Ultimately we aim to provide a development that as high in quality and differentiation as its outstanding location.

This project is in the early stages of design however in terms of a notional density and mix we might suggest the following:

- Detached villas (4/5-bed) 21-units
- Semi-detached / terraced units 12-units
- Affordable units (terraced / cottages) 11-units

Principal views are experienced from the topographical vantage of the viewing platform (L1). Note that this path is not well maintained nor is it accessible.

The first main vista is created by the pedestrian access to the viewing platform - this is two directional looking not only westwards but taking the eye back to the Buchanan Arms Hotel when walking eastwards.

The public Right of Way is tree lined and creates a clean, clear, geometric vista across the central axis of the site. This is well established and an important east-west linkage.
SUMMARY

WHY SUPPORT THIS SITE?
1. No ownership issues
2. No access issues, and located off trunk road
3. All services/utilities adjacent the site
4. Proximity to the Square supporting local amenities and services
5. Topography allows us to maximise views and light
6. Opportunity to create critical mass and mix of accommodation
7. Special/unique environment that can be enjoyed and experienced by residents and public
8. Opportunity to upgrade existing public footpath and viewing point
9. Good scope for quality integrated landscape strategy
10. Logical and natural site for village expansion
11. Opportunity to create distinctive place to live that integrates into its rural location
12. Potential to introduce district heating system and connect to neighbouring properties
Dear Norrie,

Residential Development Site- Drymen

We write with regard to the site that you are currently promoting in Drymen for residential development. We have as you are aware supported your continued promotion of this site for some time now and would wish to reiterate our support for the development. There are a number of reasons for this:

1. We are of the opinion that the site is viable and deliverable. As far as we can see there are no real impediments from a technical perspective to prevent development thereon and the scale of the site allows sufficient land to be set aside for open space and to allocate SUDS facilities etc.

2. From initial soft testing of the marketplace we understand that there is developer interest in the location to do a quality housing development which would incorporate affordable housing in line with local plan policy. There is sufficient quantum involved in terms of unit numbers to allow a developer to employ resource and benefit from economies of scale necessary to make the site viable.

3. Drymen in our opinion would from a sustainability perspective benefit from a quality housing development of scale providing a range of product and appealing to a range of buyer types. Bringing families back into the village will help sustain education provision, bring additional regular spend to the retail and leisure offers within the village and allow deal with housing market needs.

4. It will offer an opportunity through sensible s75 conditions to ensure that the existing environmental and landscape features of the site and its historic importance to the village and tourism can be maintained and improved upon and integrated carefully and viably into the residential development.

You will see therefore there are many positive aspects that development of this site can bring to the village of Drymen and we would therefore support the proposed development and would hope that it will be allocated for development in the upcoming local plan.

We trust that this is sufficient for your present purposes however if you wish to discuss further please do not hesitate to contact us.

Yours sincerely

Jamie Doran
Director

6 December 2013

Savill's Market / Economic Update

Norrie Innes
Rock DCM
5 Atlantic Chambers
Glasgow
Photographs taken in November 2013 showing vacant retail and business units within the Village. This is a clear sign of economic decline. Additional resident population would encourage business growth and help sustain a stronger economic position.
JULY 2014

A DEVELOPMENT PROPOSAL TO SUPPORT HOUSING, EMPLOYMENT, TOURISM AND ECONOMIC GROWTH WITHIN THE RURAL VILLAGE OF DRYMEN.

PROMOTING QUALITY AND SUSTAINABILITY WITHIN A DELIVERABLE PROJECT, WITHOUT DETRIMENT TO THE CHARACTER AND APPEARANCE OF THE VILLAGE.
In December 2013, ROCK DCM submitted a response to the Loch Lomond and Trossachs National Park Local Development Plan “Call for sites” consultation, making the case that a development proposal in Drymen should be allocated for housing development in the new Local Development Plan.

The “Main Issues Report” (MIR) has now been published, and we are disappointed to find that the site has not been identified as a preferred site. This document presents a case that in moving on from the Main Issues to the Proposed Plan, the site should be allocated for housing development.

Our case is based on the following aspects:

1. A development on the site will relate well to the village: all houses would be within easy walking distance of the village shops, services and facilities. It represents an infill or linkage between the two parts of the village: the traditional village and the Castle Gardens estate.

2. The development would be very inconspicuous from the village, from the surrounding area, and from main roads. This is due to its position behind a ridge to the west of Main Street, and to its setting within extensive tree belts and woodland. Indeed, unlike other sites identified in the MIR, its development would almost be invisible from the village and surrounding area.

3. We consider that the alternative sites identified in the MIR are, in comparison, far more prominent and would effectively change the character of Drymen. The site allocated for housing in the adopted local plan (Gartness Road / Stirling Road) will be prominently visible from the village centre, and is located in a dark depression. The opportunity site identified in the MIR would extend the village well into open, flat countryside. We argue here that it would disrupt the setting and character of Drymen when viewed from the A811 main road.

4. The Gartness Road / Stirling Road site has been allocated for housing development for nearly fifteen years and has not been progressed with. This must question whether the site is an effective part of the housing land supply, and we advocate that the new Local Development Plan should identify alternatives.

5. The site is free from technical constraints on its development, and we contend that it offers the best opportunity for an increased population in the village, a proportion of which would be affordable. We have already had discussions with Stirling Rural Housing Association on their potential involvement. We explain in this document why additional population will re-invigorate the village: increase the trade for local shops and services and use of the local bus services.
BACKGROUND

This document has been prepared by ROCK DCM and is submitted to Loch Lomond and Trossachs National Park (LLTNP) as a formal response to the Local Development Plan “Main Issues Report”.

We also re-submit our February 2009 brochure. Since that initial document was prepared, the need to strengthen Drymen’s position as an attractive rural village capable of supporting itself going forward has become increasingly important. There is continuing evidence of a downward economic trend in the village with more shop closures and with a slow housing market generally the time is upon us to stimulate growth and movement. RBS made a commitment in 2010 not to make branch closures - they have not maintained this position and the status of RBS Drymen is a concern. It should be noted that the 2009 document identified a larger development area than is now now promoted.
PROPOSAL

The proposal is that the promoted site can supply Drymen with effective housing land, developable within the Plan period. Early development of the site will strengthen and support economic development, and will have a positive impact on housing, employment, tourism, and the local economy by increasing the resident population.

The indicative capacity of the site is:
- Detached villas (4/5-bed) 21-units
- Semi-detached / terraced units 12-units
- Affordable units (terraced / cottages) 11-units.

The site is approximately 3.8 hectares (9.5 acres) in size.

The site slopes gently from north to south and is bounded to the west and north by houses and gardens in the village. To the west is a recently-felled forest belt which forms a wedge between the site on the Buchanan Castle housing estate. The present submission proposes that only the northern section of the land be developed, and to the south of the proposed site lies further open land. The southern boundary of this larger area is formed by a dense tree belt.

The land is not presently in agricultural use and is immediately available for development.

Development on the site would relate very well to the existing village, and be only about five minutes walk from the shops and other facilities. We elaborate on this in the following sections of this document.

The development area sits beyond a low ridge line which runs north-south behind the row of existing houses on the west side of Main Street. These houses and surrounding trees provide a visual barrier to the new development. The effectiveness of this can be seen by two recently-built houses which have already been built beyond the ridge line, and which cannot be seen from Main Street.

The site therefore offers a development opportunity within minimal visual impact on Drymen.
SITE & SETTLEMENT BOUNDARIES
DEVELOPABILITY

The site is within one ownership, and the access routes connecting it to Main Street are within the same ownership.

We have consulted with Martin Heath Associates (MHA) in relation to the roads and transport proposals; and with CBRE in relation to the socio-economic condition and impact. With recent input from Savill’s who comment on the market and economic condition.

We are in dialogue with Mactaggart & Mickel, and Rural Stirling Housing Association about possible partnership working, both of whom are pleased to consider how we might move forward together to deliver the right accommodation mix and optimum solution for the village.

Drymen itself has to compete against other rural towns and villages. It has to offer something different, and something attractive to the market. Fundamentally the village has core key assets however these need to be strengthened to allow economic sustainability and prosperity for the future.

This can only happen through investment and increasing the critical mass of inhabitants - enough to make a difference and retain the character of the village.

We question why the currently-allocated development sites have not progressed? We assume that the sites are not attractive to Developers, are not attractive to the Market, or have constraints which have frustrated their development.

We contend that to stimulate market activity, the correct sites have to be both identified and supported.

Our case is that this site is very well located within the village and can connect the two disparate parts of the settlement – the old village and the Castle gardens estate. This document explains access, views and vistas, topographical variance, landscaping opportunities, opportunity to create mixed tenure, and all within a world class
DESIGN QUALITY

Drymen has an intrinsic quality and character that should be embraced and enhanced. The site itself is in a location that is difficult to rival and deserves high quality design and materials palette that will look good and perform well in 20, 40, 80, 100 years time. From the outset the aspiration is to establish quality, within a cohesive approach to design. The interconnection of spaces should be linked through well considered design and encourage movement throughout the site and village. Ultimately we aim to provide a development that as high in quality and differentiation as its outstanding location.

PUBLIC TRANSPORT

Road-based public transport (bus/ taxi) utilises Main Street and bus stops are located as highlighted over. These would lie within reasonable walk distance contours and provide adequate opportunities for public transport trips. Additional bus stop locations may be desirable. Bus services operate on weekdays, Saturdays and Sundays between Drymen and Glasgow via Milngavie; Balfron; Balloch and Alexandria; and Balmaha. A further range of destinations can be reach by the connections afforded by these services to the rail network at Milngavie and Alexandria; and at Balfron to Stirling and Aberfoyle. There is scope perhaps to increase the timetable/ services to accommodate future development to encourage broader usage. We would further analyse this through a Travel Plan.
ACCESS

The site is therefore discrete and hidden. Within the site, there are opportunities to design an integrated landscape.

Proposed vehicular and pedestrian accesses to the site would be from Main Street. The detailed entrance design will follow in the coming stages of detailed design through form, materials and landscaping. These accesses are proposed from Main Street without losing or compromising the character, and will provide good connection for residents and visitors.

VEHICULAR MOVEMENT

V1
Point V1 gives an entrance to the main part of the site at a logical access point 189m from the Square. An access at this point may run in parallel to the existing pedestrian access, might be screened through landscaping and through design at the detailed stage be considered within the overall context of a point of ‘arrival’ within an estate. This access could support up to 99 units.

V2
The existing access V2 might serve a potential sub-zone to the main site, which may be appropriate for a courtyard / terrace key worker accommodation/ affordable housing.

PEDESTRIAN MOVEMENT

P1
P1 is an existing path leading to a landscaped viewing platform that has views to Loch Lomond and the western hills. We seek to upgrade the path and to reconfigure the termination point by potentially introducing a more formal viewing platform. The structure will allow orientated views at a greater vantage point and better opportunity to appreciate the view. The refinement of the design will be further explored during the coming months in tandem with the wider development. We would initiate discussion with LLTNP and Drymen Community Council on the design.

With a network of footways and cycleways in the Castle Gardens and beyond to the west, the site offers the opportunity to improve connections between these and the village centre. Residents of a development on the site would have extensive walking opportunities: to the shops and services in the village, to the church and hotels, to Buchanan Castle Golf Club, and to the network of rural walkways in the Endrick basin to the west and the West Highland Way to the east.

PEDESTRIAN & CYCLE LINKAGES
setting that can differentiate itself from any other potential site.

The site lies beyond a ridge-line which runs behind the houses on the west side of Main Street. From this, the land slopes gently downwards away from the village towards the Castle Gardens estate. The accompanying photos demonstrate that the development will not be visible from the main street due to the existing houses and tree cover, and because the development would be set back from the ridge-line. For the same reasons, and with extensive intervening tree belts, the site would barely be visible from the A811 Drymen by-pass road. We have assessed the visual impact of the development from further afield, and the accompanying photographs show that due to the site’s elevation and extensive surrounding woodland areas, there is no location from where it would be visible.

VISUAL IMPACT

PHOTO VIEW POINTS

VISUAL IMPACT SUMMARY
COMMENTARY ON IDENTIFIED SITES

We note that Drymen’s housing needs are to be met within the plan period predominantly by the Stirling Road / Gartness Road site (H16), plus two small sites in Main Street.

The Stirling Road / Gartness Road site H16 site has been a feature of successive development plans since the 1999 Stirling Local Plan, and yet remains undeveloped to this day. We are mindful of the Government’s requirements that Local Development Plans must meet their housing requirements in full, allocating sites that can be relied on to provide “effective” development land within the period of the plan. We suggest that the failure to develop site H16 over a period of fifteen years is a clear indication that development of the site is constrained, and therefore cannot be an effective part of the housing land supply. It was relied on to provide housing in the 1999 Stirling Local Plan, and again in the 2010 National Park Plan. The site should not therefore be considered “effective”, and should be discounted as providing housing land in the new Local Development Plan.

The MIR identifies a “long term development opportunity” site beyond the existing village edge in Stirling Road. Visiting this site and considering Drymen’s setting from the important view from the A811 by-pass road, we conclude that this site is a poor choice. The character of Drymen when viewed from this road is primarily influenced by a strong green wedge which separates the road from the village, beyond which the village houses - again set in trees – are visible at a distance, usually at a lower level. The effect of this is that nowhere does the village directly abut the road, and the village is seen slightly distant, and within a very effective landscape setting. The opportunity site however is a hilltop sloping down to the A811, where a good landscape will be difficult to achieve, and take many years to reach a level of maturity. The site also represents a major expansion of the village into open countryside with few natural or woodland barriers until the A811 is reached. It would therefore fundamentally change the shape and character of the village. All these issues are in contrast to the promoted site which, as explained in this document will not alter the character or setting of the village, and provide development land much closer to the village centre.
THE PREFERRED LONG TERM SITE WILL DISRUPT THE PRESENT VILLAGE CHARACTER WHEN VIEWED FROM THE A811. DESTROY GREEN WEDGE; EXTEND DEVELOPMENT INTO FLAT, OPEN COUNTRYSIDE; GIVE VILLAGE A ‘RAW EDGE’.
WHY SUPPORT THIS SITE?

1. No ownership issues
2. No access issues, and located off main street
3. All services/ utilities adjacent the site
4. Proximity to the Square supporting local amenities and services
5. No adverse visual impact
6. Topography allows us to maximise views and light
7. Opportunity to create critical mass and mix of accommodation
8. Special/ unique environment that can be enjoyed and experienced by residents and public
9. Opportunity to upgrade existing public footpath and viewing point
10. Good scope for quality integrated landscape strategy
11. Logical and natural site for village expansion
12. Opportunity to create distinctive place to live that integrates into its rural location.
CONSULTATIVE DRAFT LOCAL PLAN (NOVEMBER 2008): RESPONSE
A POSITIVE & SUSTAINABLE WAY FORWARD FOR DRYMEN
FEBRUARY 2009 & MARCH 2010
presented by:
ROCK DCM to Loch Lomond & The Trossachs National Park
PREFACE

We present our proposals for Drymen from a strategic perspective encompassing the following aspects:

> planning
> socio economic
> spatial

Our proposals will not dilute the local sense of place. It is our aim to deliver a scheme that will sit well within the landscape and be welcomed within the village Conservation Area.

Consolidation of local amenities and provision of a new tourist information point at the Square will tighten the cluster and reinforce the centre of the village, and provide navigation for visitors.

Our proposals are seen as a timeline looking forward - to build upon the village's reputation as a desirable rural destination. More importantly perhaps as a desirable and attractive community to live, work and spend leisure time. A vital social and economic mix and a critical mass is necessary to sustain the village - within is a strategy that will achieve this.

We will achieve this working in partnership with Loch Lomond & Trossachs National Park and Drymen Community Council, through setting high standards and a clear way forward.

This is the start of a process of design and compliance and creating something special for the village of Drymen.
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17. Notes
18. Addendum: 10 March 2009
   20 October 2009
INTRODUCTION

ROCK DCM is an award winning property focussed company combining the practices of planning, engineering, architecture and design, cost control to deliver changed spaces and places. Our track record provides a fusion of project works although the thread continuous throughout is regeneration. We have been involved in regeneration projects in Cambridge, Sheffield, Fort William, and in Glasgow at Homes For The Future, Millennium Spaces, the Broomielaw, Merchant City and more. Regeneration projects in Cartcosh Village, Cumbernauld Village and Downham Market (Norfolk) proved hugely successful, positive enhancements and improved local environments for communities.

We have commissioned MHA to assess engineering, traffic and utilities assessments. We have commissioned Shiels Flynn as landscaping consultants. CBRE have been engaged as social and economic consultants. While there are a number of intrinsic differences between our proposals at Drymen and the achievements at Poundbury, Dorset, we have consulted the Princes Trust Foundation for the Built Environment established by Prince Charles (Duke of Cornwall) and act as advisors to urban design and regeneration projects throughout the UK. Encouraging a sense and pride of place and a community, with a human scale and a sense of belonging will be at the heart of our proposals.

We will work together with LLTNP planning department to deliver a well considered, integrated scheme that provides Drymen with an opportunity to create economic growth, an additional resident community that will supplement services and facilities and key worker accommodation that will provide affordable housing for sale and rent.

The key to this report and our proposals is opportunity and sustainability within a rural setting and community and to encourage retention of a younger community. We have looked at how we can achieve this, where this can be achieved and how it links into an existing functioning community.

REPORT CONTEXT

This report is submitted by ROCK DCM Ltd, in anticipation of the formulation and publication of the Loch Lomond & Trossachs National Park Local Plan (Consultative Draft expected November 2008) and seeks the designation of a site west of Main Street, Drymen for the development of residential units and potential for workshops, a percentage key worker/assisted living accommodation. Demonstrable community benefits will be delivered as part of this proposal.

The purpose of this report is to first of all provide a planning policy analysis of the Main Street site. Additionally, ROCK DCM Ltd have engaged the involvement of key consultant Martin Heath to assess access and traffic impact considerations, and Dougall Baillie Associates to assess flooding aspects of the site.

ROCK DCM have analysed the landscape and visual aspects in order that we may arrive at the most appropriate solution befitting a site of this nature in this location. Our findings are outlined in the succeeding chapters of this report. These promote land use with direct access of a main road, within an existing community - with the view of achieving a feasible, logical and sustainable way forward for the village over the coming years.

We have considered the utilities aspects of the site and capacities/ upgrades and enablement throughout the proposals. We will of course co-ordinate the utilities programme with other development stakeholders.

Sustainability of the proposals and a harmonious design strategy are critical to establishing the right standard in this location, with a genuine world class setting and orientation. We will present you with a design statement outlining our intent as well as a strategic view of linkage into the existing infrastructure network, paths, roads, rights of way and present you with a scheme that offers a sustainable expansion to the community, where economic benefit to businesses and facilities can truly benefit from achieving the critical mass and population. We will work positively with LLTNP, Drymen Community Council and McTaggart & Mickel to stimulate growth in the local economy and community.

These proposals have been considered within the context of an existing rural village and resident community. We have undertaken a study of the village with CBRE, from a socio-economic perspective and taken an objective view of the current climate, its position, sustainability and potential for strengthening over the coming years. We have looked at the resident population, the attraction of the area and the commercial reality in engaging with the activities and requirements of the National Park and the opportunities this affords. We will demonstrate within this report that there is a need and real opportunity to enable this site for residential development, and take a strategic approach.
LOCATION & GROWTH

Drymen grew during medieval times through its position at the crossing point over Endrick Water. It became a common meeting point between highland and lowland and a point of orientation was quickly established around what is now known as the Square.

Local hostelries opened and by the late 1700’s the Clachan still remaining at the north of the Square is said to have become licensed.

We can see from the above plans that the area surrounding the Square was predominantly agricultural or green belt land, much of this remains the same today.

By the mid-1800’s a resident community had formed with sufficient demand to facilitate a bank, a hotel, bowling green and church, with manse. Education was provided at a School of Industry, virtually on the same site as the primary school is today.

By the first quarter of the 20th century we can see the proliferation of residential dwellings - all radiating from the Square and initially towards the east.

Buchanan Castle Golf Club was not established until 1936, which by Scottish standards is relatively new. Nevertheless it does indicate to us that there was sufficient population by these years to justify its creation. The linkages back to Glasgow and to Stirling would have made travel laborious and time consuming - further the number of people with a car and actually able to travel would be minimal.

The curling pond would have been well established as a community facility and by these years we see the emergence of further conveniences, a public house and creation of a public park.

Art of this time romanised Scottish countryside encouraging tourism to the area as a destination.

The outbreak of the World Wars presents us with a gap in the plans of that time. We do know that Buchanan Castle (former home of the Duke of Montrose) was used as briefly as a hotel during the 1930’s until reverting to a military hospital during the Second World War.

The village itself was a largely farming community with no industry and with the railway line a distance to be useful in transporting goods, yet too far at that time for commuting distance.
Over the subsequent years the village and its amenities grew with tennis and football now available as recreational sports within the community. Strathendrick Golf Club opened to the south of the village and we now being to see that by the end of the 1960’s much of the increased residential population are spreading northwards. Buchanan Home Farm and its cottages remain to the west of Main Street, which has established itself as the main thoroughfare through the village.

Advancements in the size and scale of the village from the end of the 60’s until now have been generated largely by advancements in travel and leisure. Expansion has been largely constrained and like many other towns and villages of such attraction, services a small commuter population who take advantage of its close proximity to Glasgow and Stirling during the week.

Nevertheless the village does manage well to maintain a strong community spirit and some part of this may be down to its relative isolation from neighbouring settlements.

The formation of Loch Lomond & Trossachs National Park naturally brings increased profile to the area and outdoor enthusiasts enjoy the experiences the eastern side of Loch Lomond offers, most especially Ben Lomond. Traffic does necessarily travel into Drymen and skirts westwards on Balmaha road to access Rowardennan from where the walk most popularly starts.

In terms of our site of particular interest this has been disused land for as far back as we can see - at least until the mid-1800’s. Green belt here is in abundance, which does not mean that there is a case for careless expansion, rather we feel that there is an opportunity to safeguard and assist the future life of a rural community at a period in history where rural communities are suffering given ongoing struggles with farming as an industry competing with other career choices and foreign farming imports from other European countries.

The village development to the north of the Square appears to work well spatially due in part, to the density of cluster. Its proximity to the Square ties it into the heart of the village and pedestrian linkages allow a sustainability.

Our site provides a logical and sustainable addition to the community. The critical mix of population providing an opportunity for key worker and affordable accommodation and start up business facilities within the development proposal allows the existing community and new residents to fuse. Sports facilities within the village and existing businesses will benefit from additional revenue and those looking to move from a family home, or return to their home town after university for example will have an opportunity to do so.

A well-managed and controlled, well considered expansion on this site can create a depth to the village and a sustainable buffer to the green belt beyond. Well designed and well thought through architecturally, schematically and integrated through landscaping this would be a positive addition to the village.
Principal access routes have varied little over recent history, dictated largely in early days by Drymen’s position in relation to Endrick Water and logical access arrangement. These routes have been sufficient to transgress the different eras from medieval times to present.

**ROAD:**
Drymen is served by road only, with routes arriving from Glasgow and Stirling on the A81. This route skirts the entrance to the village and continues straight through breaking only to allow a connection with Main Street (B838). The main arterial route to the village centre and beyond passes at the core - the Square. Rowardennan and the western reaches of the village and beyond are accessed from the B837.

Vehicle routes on the B roads can at times be slow moving due largely to tourist traffic on unfamiliar routes, keen to access the eastern shores of Loch Lomond. There does not appear to be a capacity issue. Similarly the A81 is a connection between Glasgow and the rural villages of the Stirlingshire countryside. Proximity to the commercial cores of Glasgow and Stirling has given way to commuter traffic and during these times the road can be busy although, from a traffic flow point of view, with capacity for additional vehicles.

The critical connection is the junction at Main Street/ Stirling Road - this defines the southern most tip of the village, main access point and gravitational boundary to the heart of Drymen. It provides the gateway to Drymen and linkage between the village and the golf club.

**WALKING:**
Drymen is generally regarded as the end of the first stage of the West Highland Way. From within the village walking access throughout is comfortable and convenient. The village’s strength will be further reinforced by the opportunities this provides.

**BUS:**
Regular bus service connections within the rural area are operated by First and Stirling & Clackmannanshire Public Transport. The provide connection between Balfron High School and Balloch Bus Stance. These run on a two-hourly basis. There is one additional service that runs on school days only. Bus services to Glasgow and Stirling operate on a two-hourly basis also. The first service leaves Drymen at 0722 arriving into Glasgow Bus Station at 0830, and 0709 arriving at Stirling at 0754. These times are important in understanding people movement.

A private company McColl’s also operates a bus service on these routes at slightly more frequent times, between Alexandria and Balmaha. Stops on all routes tend to be at the Square, and on either Balmaha Road or Buchanan Castle road end.

Road-based public transport (bus/ taxi) utilises Main Street and bus stops are located as highlighted ever. These would lie within reasonable walk distance contours and provide adequate opportunities for public transport trips. Additional bus stop locations may be desirable. There is scope perhaps to increase the timetable/services to accommodate future development to encourage broader usage. We would further analyse this through a Travel Plan.

**CYCLE:**
No specific cycle route facilities exist within the village and cyclists make use of the existing road network. Cycling as a form of transport for this development are also well supported by the development design principles and road alignments. Some potential for shared walk/cycle paths exists and the development does not prejudice cycle transport.

We would work with Council officers to help develop a cycle strategy linking homes/ village square/ places of employment and integrate cycle stands within the village Square enhancement proposals in conjunction with LLTP and Drymen Community Council.
The infrastructure and general vehicular and pedestrian movement within the village is towards the Square.

The built typology follows a rural order with heights no greater than 4 (modern equivalent) storeys at the Buchanan Arms Hotel. This relatively low height allows the passage of sunlight to all areas and despite the orientation of many of the existing dwellings following a north-south direction, their grounds do afford light and space.

Prevailing wind comes from the south-west. The village is sheltered somewhat to the western side by the existing green buffer on the north and south of our site. The mature vegetation at the Buchanan Castle Golf Club provides immediate shelter to our site and the mature vegetation around the Home Farm to Bramblewood area of the village provides shelter to the village centre.

From a planning and layout design perspective the village follows a north-south flow and the orientation of (generally single) housing plots tend to sit east-west from the south side of the Square northwards.

In terms of how our site might be orientated we demonstrate there is scope to acknowledge not only the north-south axis of Main Street but also to provide a visual connection and relationship with the green buffer to Loch Lomond. The principal artery will run north-south however with east-west connection into Main Street. This is later discussed in the Access section of this report.

We propose a well considered and well thought through schematic layout that will embrace existing built form, existing layout orientation, views and vistas and mature landscaping and create an interesting and positive use to the vacant and underused land bringing wider benefit to the existing community.

Present Land Use:
ZONE A: No agricultural use for over 20 years
ZONE B: Rotational grazing
> Village Views & Vistas
By far the main point of orientation to which all routes and vistas are drawn within the village, is the Square (S). This is the village centre, the nerve centre and point of arrival into the heart of the village.

There is a sense of discovery rather than expectation - there are no wide boulevards and grand entrances and approaches, rather routes seem to emerge from this social hub. Vistas are short given the historic and slightly organic nature of the growth of the village.

Views are retained generally for outward looking aspects and vantage points although the circulation around the Square and containment of space around means the animation occurs around this civic focal point.

> Site Specific Views & Vistas
Consideration of existing views and vistas will inform the structured layout and orientation within the site itself. This will be intertwined with differences in space between public and private. The detail of this will be further developed in the successive layering of design. We will create new visual connections in both north-south and east-west, and we will provide protection and enhancement of those existing. Its location provides discretion - Drymen Parish Church is very much appreciated looking across Main Street from the higher ground and our proposals have potential to create, or expose understated vistas.

Principal views are experienced from the topographical vantage of the viewing platform (L1). The most attractive views are westwards towards Loch Lomond although significant tree felling in the foreground interrupts the continuous green carpet nevertheless we benefit visually from the open landscape. We should seek, with a reduced planting zone to preserve these views. Beyond boundaries north and south, the topography falls and mature landscaping permits shorter, less generous views.

There are two main vistas.

(L1) The first one is created by the pedestrian access to the viewing platform - this is two directional looking not only westwards but taking the eye back to the Buchanan Arms Hotel when walking eastwards. The path is presently poorly maintained and at times hazardous. We seek to enhance the strength of the path as a vista through landscaping and resurfacing, giving definition and interest to the route.

(L3) The public Right of Way is tree lined and creates a clean, clear, geometric vista across the central axis of the site. This is well established and an important east-west linkage.

We have treated these vistas as design constraints within our masterplan proposal and will retain visual linkage across the site and leading views north-south. These will both be further developed throughout the detailed design stage.

Views and vistas occur looking into the site as well as outwards. These will be considered within in parallel with privacy, public and private spaces, open spaces and direct views as well as shorter views that use landscape screens. Our proposals will protect and enhance.
**SCALE**

As we move away from the central core of the Square perimeter, more contemporary development, has taken place using more contemporary design and materials. These schemes have diluted the sense of place and we will ensure that our proposals will do the opposite.

We experience a variance of scales ranging from two storey stone buildings with pitched, slate roof in vernacular design to the three - four storey Buchanan Arms Hotel. There are more modest properties extending two storeys that have a prominence within the local area - these tend to be the later properties built more around the Victorian era, where their solidity and size and scale exert a presence beyond the relative massing of its predecessors. The existing Royal Bank of Scotland property on Main Street is an example of this - it appears elevated and aloof and out of context with its prominence and scale.

Where we seek to secure the future of the village through development there has to be a harmony in fusing old and new and respecting existing structures and scale. Scale and topography work together - the Buchanan Arms Hotel is a good example, where the land to the east and the rear of the building cascades and the building takes advantage of that. Prominent positions on corners and main junctions such as the hall on Old Gartmore Road, and the B&B on the corner opposite the Post Office, the predominant house on Balmaha Road, behind the Clachan Inn. These two eras in architectural history sit side-by-side, both different, both different scales and both with equal importance.

**MASSING**

Massing and density will work together with scale to bring a sense of dimension to a space and there are a variety of massing precedents within the village.

The closer we go to the Square, the greater the massing and density. However it is worth noting that over a distance of 574m (or thereby) from the top of ZONE A to the bottom of ZONE B, Main Street (as a main road) serves only 15 residential units. This could be more efficient.

We can see from the plan opposite that the massing of the village extends principally northwards towards the Primary School (and to some degree eastwards). The village ‘tails off’ to the south along Main Street and it is our opinion that the primary area for development that will provide meaningful contribution to a community is to the west of Main Street. On a physical level this allows feasible, logical controlled expansion to the village, bringing critical numbers to the village. This is supported in an economic sense by the report from CBRE.

We will deliver the right scale, massing and density in order that we achieve a development that establishes the high standard, tempo and right type of environment for this world class site.
Our amenities appraisal addresses (i) typology and placement within the village layout plan, and (ii) economic condition - and asks are they sustainable?

(i) The plan opposite plots existing amenities and the natural gravity of the civic centre of the village has grown around the Square, around which retail, post office, library, hotel and public house and other amenities are centred.

The Square itself is under used as public realm and forms more of a roundabout than an area of civic gathering. As a village plan the nucleus of community life is energised from the nucleus at the Square - distributing veins to the amenities that sit on the outer reaches of the streets.

Drymen Primary School has a role of circa 124 pupils and 7 (full time) teaching staff (with visiting staff). The new building and its playgrounds are located to the north of the village in a more rural setting. Secondary education is undertaken at Balfron High School. The existing primary certainty has scope for expansion were it required. The school brochure demonstrates that those involved take a pride in being a part of the community and encourage integration with local events.

Tourism is a significant contributor to the local economy. The West Highland Way passes adjacent the village centre and Drymen is often used as a first stop on the famous walk to Fort William.

Despite a tourism economy the Tourist Information office within the library closed in 2006. It is our proposal that a new tourist information point with potential to link in with a new bus shelter/pavilion is obviously subject to fuller design consideration, is delivered within the Square. This will bring a point of connection back to visitors to the village. This becomes a point of orientation as well as information and encourages a prolonged stay in the village.

Further design detail on the information point will follow at the next stage although we will set/establish high design standards.

The existing RBS building is detached from the cluster of amenities. We propose to relocate the Royal Bank of Scotland from Main Street, to the Square and consolidate amenities at the civic centre.

The service and retail sectors include 11 outlets dealing in retail, food and grocery shopping, car garage, bank, clothing and art gallery/gift shop. An exchange of community news can be seen in the Post Office/store - one of the few rural PO’s to remain open during the Government restructuring programme.

Each one of these services and retailers can benefit from an increased resident population - that means one more loaf of bread per household, one more set of clothing per household, more gifts per (visitor) household purchased locally, etc. Across the retail and service sector the impact of additional housing cannot be understated - it will drive a sustainability in local businesses and give added confidence to their position. At the last census the village had 681 residents, additional residents means additional wealth within the local economy, this would make a contribution. Further with projected decrease in earning population it is essential that we create the opportunity for business and community sustainability.

Further the 4 restaurant/eateries and 3 public houses would also benefit from additional residents. The 10 hotels and B&B’s will retain their function servicing the tourist community although benefit from further recommendation by the additional residents. Increased fuel charges and cost of living has seen a rise in holidaying at home - these facilities in attractive rural towns such as Drymen must be in a position to compete and benefit from this trend.

This contribution spreads beyond service and retail and permeates the facilities boasted by the village. The leisure centre will have additional members, the tennis club and bowling club will gain members, bolster their talents and nurture others, the golf clubs will gain additional memberships in a time where clubs generally are seeing falling memberships. Drymen affords its inhabitants time. It infuses relaxation and human pace.

### Graphical Elements

- **Healthcare & Education**
- **Public House & Hospitality**
- **Community Amenities**
- **Service Industry (Non Hospitality) & Retail**
- **Sports Facilities**
Throughout time these two areas have remained underused, performing no real agricultural purpose in the case of the northern part and as grazing land to the south. They serve as a green buffer to Loch Lomond. There are few constraints and the 24.48 acres is well placed to connect the southern reaches of the village to the village Square, there is flexibility within the site to design appropriately. The site is within close proximity and very easy walking distance to the Square and offers potential to create a genuine positive contribution to the community and amenities. The site comprises land owned by NW Innes and the Duke of Montrose, 9.568 acres and 14.73 acres respectively.

Identified within the Stirling Council Housing Land Audit 2007 as a site for potential development, the former Salmon Leap site is a 0.49 acre piece of brown field land has been suggested as a potential for subsidised housing. The land sits between the bowling club and the Post Office and constrained to the east by existing housing. There is an existing access route to these rear cottages, which could assist with accessing further development. The site is small - is there a reasonably cost effective solution to enablement? Delivery of this site would certainly knit Main Street together at a key point.

Once again identified within the Stirling Council Housing Land Audit as potential for owner occupied housing, this 0.27 acre site is relatively small and relatively constrained. The boundaries of the roads on two sides and bowling green to another raise questions over the quality of product and how meaningful a housing solution might be in this location. From a strategic point of view there are benefits to filling the gaps however the density in this area does not demand critical infill and what we may be doing is closing gaps rather than looking at a more substantial, perhaps more meaningful contribution.

The site identified within the Stirling Council Housing Land Audit 2007, between Stirling Road and Gartness Road offers a relatively compact opportunity for development, close to existing amenities and to the civic centre. There is scope to enhance a medium density area southwards to meet the neighbouring site on the opposite site of Gartness Road and this would add to the ‘jigsaw’ at the north-eastern edge of the village. The area of the site is 6.103 acres or thereby, with existing housing to both sides albeit the boundary to the southern edge is most immediately formed by a road.

This site has already been identified in the Stirling Local Plan as a potential area for development to accommodate a mixture of owner occupied and affordable housing. It is a greenfield site.

In terms of impact on the local community and facilities and amenities, to what extent can reasonable density be achieved on this site that will generate sufficient population and make a positive contribution to the village?

This site offers 13.61 acres of potential development land. Connections from this site are limited in the respect that it sits remotely on the junction of two roads, one being the main arterial route A811, it also reduces any green buffer with the road in this area of the village. Alone it seems distant from the village centre - at arms length. Further natural gravity of expansion does not naturally extend eastwards in this area.
Drymen has the opportunity now to secure its future and deliver housing on this site that will help achieve a sustainable way forward.

This site is critical to achieving all the above. Its location within the village massing and natural gravity south of the Square, its proximity to all amenities, the critical number of people that will integrate into, and support the local community will make a real difference. We will provide the opportunity for the live, work, leisure dimension - all within the same village. Local businesses can be further supported, and additional business/es generated through additional residents.

The size of the site as a residential development will allow us to offer a vital mix of accommodation typologies, from privately owned and occupied to affordable/key worker accommodation. We are encouraging the extended life cycle of living in the village through positive demographics - deliver the three generations - living, cycling, study and working, relaxing together in Drymen.

The location, positioning and orientation of the site all favour this as a natural site of preference. Development thereupon will bring a balance to the village providing a more even distribution of ‘weight’ and connecting, the south of the village with the centre, through the efficient and effective use of the existing ‘Main Street’ infrastructure.

A site in this location is largely unconstrained in terms of overlooking, and over shadowing, there are no real privacy concerns to existing buildings - the topography assists with this and the structure and orientation of the proposed buildings will relate to one another to bring the optimum solution for habitation.

The mix of accommodation will be important in creating the right densities in the right areas, opportunities for affordable housing, terraced/semi-detached living as well as detached, more spacious living. External space is hugely important, designing for this particular environment where there is a positive influence from outdoor activities, sports and recreation. This brings a design attitude as well as a lifestyle dimension to our proposal.

*This site differentiates itself from all others in a number of ways:

1. it is largely unconstrained,
2. access (3 no. secured points) can be achieved within existing road (Main Street) conditions,
3. secured access/ownership,
4. the size of the site facilitates meaningful additional population - change to the local demographics assisting with economic factors,
5. proximity to the Square and all amenities, the connecting piece in linking the gateway to the civic centre,
6. topography and orientation allow us to maximise views and light, and vary the accommodation type;
7. key/seasonal worker accommodation,
8. assisted living provision,
9. quality family homes,
10. quality affordable studios/cottages for sale/rent,
11. we can implement a meaningful, cohesive landscape strategy,
12. we can enhance linkages,
13. we can deliver a more experiential use of land, harmonious with local and planning needs,
14. we will contribute to civic pride
15. we present you with a strategic view that will strengthen Drymen for the coming years, and differentiate it from other rural communities,
16. we present you with the opportunity to improve economic conditions
17. it is the natural location to accommodate the village expansion, to a position of achieving sustainable critical mass.

In the subsequent sections of this report we demonstrate our intention to retain and enhance existing views and vistas, integrate with existing landscaping, provide and strengthen existing pedestrian linkages to the Square, provide a coherent linkage strategy within the site itself enabling vehicular movement and tying in the notion of the traditional Scottish estate together with a well considered, well designed landscaping and architectural statement, befitting a world class site. There is scope on this site to create a variance in the densities with low, medium and higher densities encompassing the opportunity to engage with the geographic location of the site, demographics of the site and village, and bring an achievable, sustainable development layout to the village.

*The development proposal by ROCK DCM can be considered beneficial for the residents of the village of Drymen and the LLTP area... It promotes sustainable economic development, includes affordable housing and will positively impact on the local economy. It also has the potential to improve local residents’ quality of life* (CBRE)
At this stage of establishing principles we demonstrate the potential for a variety of accommodation typologies, mixes and densities shown on the plan opposite. The detailed stage of design will inform the individual units although these will harmonise with the design statement contained within this report.

**HOUSING MIX**
The plan opposite shows an indicative zonal layout comprising the following types of accommodation:

- key worker/affordable housing;
- assisted living;
- terraced housing, and
- villas.

Their orientation will be based on:

- mixed tenure,
- topography, and
- village distance contours.

The topography and orientation of the site allows provision of low, medium and higher density areas and will bring a vital generation spread; key workers and affordable housing, opportunities for young people, opportunities for young families, growing families, married couples, working families and those retired.

**MASSING**
At this early stage of design the massing values have yet to be established. What we can offer at this stage is the principal of a variety of massing models, which will relate directly to housing typology and market.

The zonal marking given distance contours gives us a physical condition that can begin to inform the process. For example, it makes logical sense that key worker and affordable housing may be more clustered (perhaps a courtyard layout!) located closer to the village centre.

We would propose a thoughtful hierarchy between the massings of build form and the tenure. The spaces and the connections between the different areas will allow us to move across the zones giving an experiential journey from detached villas to terraces to courtyard accommodation. The massing will be achieved through the buildings’ relationship and proportion with the private outdoor space.

We enclose a simple but focussed Design Statement that establishes an approach to impressing a design standard. We seek to provide a solution that provides a quality environment in a world class location - harmonising with the materials, robustness and clear form of many of the existing local buildings.

**DENSITY**
A variety of densities across the zones generates the opportunity to acquire a healthy mix, variety and hierarchy of spaces and places reducing a repetition of rows of houses.

**SCALE**
Examining existing typologies within the village, there are numerous examples of differing scales from the single storey croft type to the robustness and scale of the baronial Buchanan Arms Hotel to weight of the Victorian villas. The levels of appropriateness within this rural setting are dictated largely by tenure and topography.

We would propose that the design guidelines for the site include parameters on scale, in order that there is continuity and cohesion across all zones.
Within this report we present you with principals of movement. The detailed design stage will determine what the entrance is, through materials and finite detailing in roads design and compliance, landscaping. At this stage we set out a hierarchy in vehicular movement and to submit for approval two secured access points to service the future phased development programme and key pedestrian routes. We will deliver the right scale and proportion of access provision for this development and all accesses and roads will be delivered to an adoptable standard.

Further, access will be gained without loss of housing or character along Main Street, sitting within the proposed village Conservation Area.

The new access points will deliver, for residents, visitors and tourists, a different directional perspective to two of the villages special buildings, Buchanan Arms Hotel and Church/ Cemetery.

**VEHICULAR MOVEMENT**

**V1**

Point V1 gives an entrance to Zone 1 at a logical access point 189m from the Square. An access at this point may run in parallel to the existing pedestrian access, might be screened through landscaping and through design at the detailed stage be considered within the overall context of a point of ‘arrival’ within an estate.

‘V1 affords adequate visibility and road space within Main Street to accommodate trips and vehicles’ (MHA).

This access could support up to 99 units.

**V2**

The primary access point to Zones 2 & 3 is at V2, direct through surplus scrub garden at 70 Main Street. Martin Heath (MHA) advises also that:

‘The location for this access is good and offers optimum opportunity to afford a safe and convenient access; without detriment to the existing road network and/or private accesses, or necessitating costly and disruptive road realignment works. Adequate visibility can be achieved from V2, although there is a case if necessary for accepting a reduced visibility envelope, since speeds on Main Street are already constrained by the rural and geometric alignment.’

This access could support up to 99 units.

**V3**

The existing access V3 would serve a potential sub-zone 1b, which may be appropriate for a courtyard/terrace key worker accommodation.

‘Visibility is constrained at this point by existing buildings and the road alignment. However, vehicle speeds are constrained by current alignment and geometry, which would further investigated through a safety audit. Assuming this (courtyard) site did not exceed 20 units, this site could function acceptably in traffic terms. It could be argued that given the nature of a courtyard development would be for affordable housing/ key worker accommodation there are likely to be reduced trip rates’. (MHA)

**PEDESTRIAN MOVEMENT**

P1

There is an existing Right of Way across the site as a landscaped lined navigatory route from east-west, which acts as a key pedestrian linkage to Buchanan Homes Farm. We have viewed the existing landscaping here as a design constraint retaining a landscaped strip breaking it only to facilitate secondary/ emergency vehicular access through the site. The rural experience of the route will be protected whilst at the same time enhanced through appropriate surface treatment.

P2

P2 is a path leading to a landscaped viewing platform that has views to Loch Lomond and the western hills.

We seek to upgrade the path and to reconfigure the termination point by introducing a more formal viewing platform. The structure will allow orientated views and a greater vantage point and better opportunity to appreciate the view. The refinement of the design will be further explored during the coming months. The Glenfinnan monument is a well-known precedent - a potentially iconic structure for a world class view. This is for further discussion with LITNP and Drymen Community Council.

**NOTE**

There may be scope at the coming stages of analysis to create pedestrian and cycle linkages to the proposed rural activity area. There are wider issues of ownership and traffic management to be considered since this would require connection over Stirling Road.
CONCEPT

A key ingredient in creating a positively experiential scheme will be the arrival and transition of space from public to private and views and vistas created thereto. These will be critical to differentiating this development from many others.

Within this rural context we have related to a more traditional idea of the estate. Much of our traditional estate architecture is based on the concept of processional space - a subtle unfolding of the private realm as we progress through the layers from the site exterior. As transitional, in-between areas the street typically addresses the sensory as well as perform the physical function of transporting from one area to another. Landscaping, orientation and presentation of public and private spaces will generally inform this aspect of the design.

However the creation (and retention) of views and vistas into and out of the site will generate interest and draw the eye to focal points any beyond the public boundary. Views are important, experiences include impact, surprise, familiarity, sense of place, the hidden gems.

(landscape) vista 1 (L1)

We will retain and enhance the world class view westwards to Loch Lomond and the western hills by upgrading the route to a well designed, well considered viewing platform - securing views for the future.

(landscape) vista 2 (L2)

Public vista established by the existing right of way connecting Main Street to the viewing platform. We propose to retain this route, reconfigure the platform and frame the view to Loch Lomond through vertical landscaping as indicated on the adjacent plan. There is a clear line of sight from the Buchanan Arms Hotel at Main Street that shows the land rising towards to platform.

(landscape) vista 3 (L3)

A public right of way exists across the site running from Main Street to the farm land on the west of the site. The path is lined with fairly mature, tall and attractive planting and we seek to retain this making breaking the momentum only to allow a cut for the north-south axis - principal connection between the two 'halves' of the site.

(public/private entrance) vista (E3)

A peek-a-boo view from Main Street to the rising topography, landscaped vista, past the site boundary into the site. The vista terminates at the peak of land and through the detailed design stage we will demonstrate how the entrance to the estate will be expressed to differentiate it spatially from Main Street. Looking to Main Street from within the site this vista actually creates a line of sight and a stunning view (not usually seen) to the Parish Church.
Existing physical linkages with the village centre are all connected to Main Street. Our proposals will notionally echo Main Street - linking the north and south of the site - and cross-site linkages occur at three main points acknowledging the two existing established pedestrian routes and creating one further that will make the vehicular connection.

In terms of reaching beyond Main Street the public right of way allows connection with Buchanan Homes Farm (equestrian centre) in the west - once again this is an established route and we seek to include that within our design proposal - formalising the route as a tertiary linkage will, notionally at least, encourage movement there through, raising awareness of the opportunities the Farm has to offer.

The proposals presently offer connection from the site eastwards to Main Street only, with the exception of the cross-site right of way, and the linkage with Buchanan Castle Golf Club to the south west of the site (pedestrian only). In terms of pedestrian/ cycle distances distances are shown in the section 'Zoning Plan'- proximity to the central village hub is close.

There are visual linkages westwards to the Loch and hills and eastwards to Main Street, and beyond. The proposals seek to enhance amenities within the village and the fingers of the site all reach towards Main Street to allow easy access. Similarly the physical and notional linkage with the Golf Club raises awareness of its presence and leisure opportunity that instils.

Beyond the immediate linkage proposals the affordable/key worker accommodation will link with Drymen’s position within the National Park, giving the opportunity to link in with employment and leisure in the area. The village will benefit from this additional resident population of workers who can engage with the existing community, leisure facilities and amenities.
STATEMENT OF INTENT & APPROACH

1. EXISTING LANDSCAPING
We seek wherever possible to retain existing landscaping and integrate it within the next stage of the detailed design. We will repair/replace broken fencing where required. It is likely that we will have to break the continuous landscaping flanking the public right of way, to enable vehicle passage (if necessary). We will replace any removed trees. Existing mature trees/vegetation to the perimeter of the site will be respected. On top of this tree removal will be minimal and compensated for by new structured planting/landscaping provision.

2. A HARMONIOUS APPROACH
The whole development will be linked through high design standards using a consistent design and palate of indigenous (where possible) materials. We will work positively with Shiel Flynn to deliver the high quality landscaping design that will set the standard for the development. We will provide appropriate detailing, using robust materials and create, through landscaping and layout, appropriate experiential dimension to the development that will distinguish it from other residential developments and be recognisable as an estate from outwith.

The boundary treatment to Main Street will be critical and important in providing a visual linkage on Main Street. Further the landscape/amenity interventions such as tourist information point/bus shelter at the Square should integrate/harmonise using the same materials and design.

3. VISUAL CONNECTIONS, VERTICAL SCREENS
We will deliver important visual connections and linkages through the landscape strategy where key views in and out of the site are created, retained and upgraded. Privacy to existing dwellings and grounds will be respected and landscaping introduced as vertical screening to protect neighbouring interests. We suggest a proposed landscaping infrastructure that integrates to provide transitions between public, semi-public and private spaces; to navigate the eye to particular views; to frame particular views; to create different spaces across the site and to set the standard for the development.

4. HORIZONTAL & VERTICAL PLANES
The landscape strategy will follow in finer detail over the coming stages of design. We seek to deliver a robust, clear, attractive and sustainable system that will address both horizontal surfaces and vertical planes.

5. MOVEMENT THROUGH THE SITE
Zones 1-3 naturally flow north-south. It is our intention to create a fluidity across the Zones that is experiential and a pleasurable journey. The integrated landscaping and architectural design will work together to give visual penetration, east-west at key points. It is also our intention within the design to use landscaping and architectural design as navigatory tools on a north-south route. This level of detail would be undertaken at the next stage of design.

6. ELEVATION
Zone 1 has undeniable world class views to Loch Lomond. Avoiding duplication (discussed earlier in Views & Vistas) although of great importance feeding into this landscape section. The design product will fulfil all the criteria within this section.
DESIGN STATEMENT

This is a simple, focussed statement about an approach to design that will assist set the high standard for the development. Lasting quality: of design, materials and a special environment: how will this look in 20, 40, 80 years? Setting the standard of our expectations right at the outset. This is our intention.

At this stage we set out the first positive steps to achieving this. We will work positively with LLTN and Drymen Community Council and other contributory parties.

1. ESTABLISHING QUALITY
Quality of environment, built form and public realm sets the standard and expectation in a place - it demonstrates civic pride.

We seek to design a pleasurable attitude across the zones - appropriately varying densities, typologies and landscaping. There should be a clarity and understanding to the whole design - this encompasses all aspects of the developments access, linkages, orientation, housing layout, views, detailing and landscaping. Places to walk, cycle, drive, rest, look, appreciate, experience where we are. A well considered, well built and sustainable, robust, safe, attractive, experiential environment.

2. A COHESIVE APPROACH
We will present well considered design - thinking through all aspects of a proposal from strategy to detail. We will create a product that is harmonious in its approach, ethos and appearance. We will adopt a set of design ‘rules’ - these would include using indigenous (where possible) materials and certainly a consistent palate - colour, material, texture. The quality of the village and the positive experience of the site through good design will set Drymen apart from other rural settlements.

We will apply appropriate and consistent design rules. This means differentiating between spaces, public and private - respecting that there are relationships between spaces.

There will be points of celebration and differentiation - views and vistas created and appreciated through design and landscaping, using the palate of materials.

3. CONNECTION THROUGH DESIGN
Design should filter into every aspect of the layout and proposal, demonstrating a harmonious approach and connecting spaces and places.

The design connection will be expressed through continuity and appropriateness.

4. DIFFERENTIATION
Drymen has its own character and sense of place - we will not dilute that rather allowing it to be a stronger.

The scheme will embrace the rural location, respect the community dimension to life and through layout and strategy encourage participation.

We would look to expand the proposed Conservation Area, in time, to encompass the site. Through good design, implementation of well considered development and embracing whole life costing, Drymen can differentiate itself from other rural villages.

5. MOVEMENT
The journey to and through the site should be experiential and enjoyable. The transition of space from public to semi-private (to private) is important in appreciating there is a difference in environment between the estate and (the) Main Street. There should be a celebration of entrance into the development/ estate - this might be a gate or might be changes in surface/ texture/ colour - this will be considered within the next level of detail.

Either way we will create a sustainable, safe and attractive design for rural living.
Please find below a list of policies set out by LL TNP within the Draft Local Plan document. Our approach is completely harmonious with the objectives as laid out below and we will work together with LL TNP and Drymen Community Council in delivering a sustainable way forward for Drymen.

<table>
<thead>
<tr>
<th>POLICY NO.</th>
<th>POLICY TITLE</th>
<th>SECTION</th>
<th>COMMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.0</td>
<td>THE SPECIAL QUALITIES OF LOCH LOMOND &amp; THE TROSSACHS</td>
<td>5, 12, 14, 15</td>
<td>Boundary treatment, viewing platform and village square</td>
</tr>
<tr>
<td>4.3</td>
<td>LANDSCAPE</td>
<td>14, 15</td>
<td>Boundary treatment and enhanced/landmark/ iconic viewing platform</td>
</tr>
<tr>
<td>4.3</td>
<td>BIODIVERSITY</td>
<td>14, 15</td>
<td>Supports and enhanced through estate management, compost recycling, bio land products</td>
</tr>
<tr>
<td>4.4</td>
<td>GEODIVERSITY</td>
<td>15</td>
<td>Work within existing geological constraints and seek to integrate</td>
</tr>
<tr>
<td>4.5</td>
<td>INTEGRATED LAND MANAGEMENT</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>4.6</td>
<td>WATER &amp; FISHERIES MANAGEMENT</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>5.0</td>
<td>AWARENESS, UNDERSTANDING &amp; INVOLVEMENT</td>
<td>7, 11, 13</td>
<td>Creation of tourist information point, tourist/landscape trails</td>
</tr>
<tr>
<td>6.0</td>
<td>RECREATION &amp; ENJOYMENT</td>
<td>7, 11, 13, 15</td>
<td>Paths, trails, awareness, accessibility</td>
</tr>
<tr>
<td>7.0</td>
<td>PEOPLE, COMMUNITIES &amp; CULTURE</td>
<td>ALL</td>
<td>Critical mass / mix: healthy, active and strong</td>
</tr>
<tr>
<td>7.0</td>
<td>Local culture and cultural growth</td>
<td>ALL</td>
<td>Information point</td>
</tr>
<tr>
<td>7.0</td>
<td>Sustaining services and facilities</td>
<td>ALL</td>
<td>Hotels, spa, information point, shops, bus, school, post office, bank</td>
</tr>
<tr>
<td>7.0</td>
<td>A sustainable housing supply</td>
<td>ALL</td>
<td>Mix and tenure, positive contribution: ownership, key worker and affordable, commercial workspace and craft studios</td>
</tr>
<tr>
<td>8.0</td>
<td>ECONOMIC GROWTH &amp; SUSTAINABILITY</td>
<td>ALL</td>
<td>Mix and tenure, key worker and affordable (30+ = region of 30 units)</td>
</tr>
<tr>
<td>9.0</td>
<td>BUILT HERITAGE &amp; DESIGN QUALITY</td>
<td>15</td>
<td>Respect for existing built heritage, acknowledgement of their importance and precedent and integration through design</td>
</tr>
<tr>
<td>10.0</td>
<td>ACTION PLAN &amp; DELIVERY</td>
<td>ALL</td>
<td>Feasible and achievable, this is a scheme ready for delivery</td>
</tr>
</tbody>
</table>

SUMMARY: THIS SCHEME IS GOOD FOR DRYMEN AND GOOD FOR LOCH LOMOND & THE TROSSACHS NATIONAL PARK

* These sectional references interconnect with other areas within the document - policy compliance is threaded throughout
APPENDICES

Appendices appear in the following order:

> CBRE: Socio-economic report
> Aerial Photographs
These aerial photographs below demonstrate the proximity of the site to the village centre and the massing of growth over the years.

From the air, we see that the natural location for growth is the site outlined - it is the best solution, deliverable and ready.
The above photographs were taken on 10 March 2009 during a visit to Drymen. It paints a factual picture of the economic challenges the village is facing at this time. (It is also worth noting that the garage at the Square is again ‘to let’). Further to the image to the bottom right is a copy of the article in last week’s Herald, advising that Brown’s Hotel is for sale. These are all signs (together with Buchanan Arms Hotel in administration) that the economic health of the village is not well.
The above images are taken from the two covers of auction properties being presented by Jones Lang LaSalle, following instructions from Administrators, earlier this month.

These properties are amongst the most prominent within the village and represent a (further) declining health - a negative movement in key economic contributor to the wealth of the town - tourism and hospitality. We feel this strengthens our argument for the need for positive, strategic change within Drymen.
**PROPOSAL CRITERIA (SET OUT BY PAN 2/2010)**

| Ownership | The site is in the ownership or control of the party expected to develop it | Within the ownership of NW Innes | ✓ |
| Physical | Slope | The site has a favourable topography that would allow natural drainage and fall; there are no awkward slopes to overcome | ✓ |
| | Aspect | Existing viewing platform to be retained and upgraded; site benefits from world-class views to Loch Lomond and the open countryside. | ✓ |
| | Flood risk | There are no considerable water courses flanking the site, or running through it. This is not a known flood plain | ✓ |
| | Ground stability | There are no issues of ground stability | ✓ |
| | Vehicular access | The site allows free access and egress for vehicles, and sight lines and distances are compliant with current recommendations | ✓ |
| Contamination | Previous use | There has been no previous land use that would create a contamination | ✓ |
| Deficit funding | 3% assistance from public bodies to make scheme viable | This can be defined once scheme finalised to a greater detail and full development appraisal carried out | ✓ |
| Marketability | Can this be delivered within the programme? | This can be achieved within 5 years | ✓ |
| | Compliance with National Park objectives | The objectives of the development would support the objectives of the LLTNP | ✓ |
| | Compliance with Final Draft Local Plan objectives | The objectives of the development would support the objectives of the Final Draft Local Plan, in terms of achieving a core affordable housing unit (and more) | ✓ |
| Infrastructure | Infrastructure constraints associated with the site | There are no constraints on infrastructure, good, free, compliant access opportunities; the site allows scope of internal infrastructure without compromising privacy and sense of place | ✓ |
| Land use | compliance with planning | Logical and achievable development site for residential opportunity to secure a sustainable future for the village, through mixed tenure and key worker affordable space | ✓ |
| | | Refer to ROCK DCM submissions made February 2009 & March 2010 | ✓ |
| Programming | Lead-in time | Work and initial sketches have already been undertaken | ✓ |
| | Expected completion over the following 5 years | This scheme can be completed within a 5-year time scale | ✓ |
| Partnership & common goal | Planning Authority | Loch Lomond & Trossachs National Park | ✓ |
| | Housing Provider | To be confirmed | ✓ |
| | Developer | ROCK DCM Ltd | ✓ |

**SUMMARY:** This scheme is good for Drymen and good for Loch Lomond & The Trossachs National Park and is achievable, ready and unconstrained.
ROCK DCM
FLOOR 5
ARGYLL CHAMBERS
BUCHANAN STREET
GLASGOW
G2 8BD

T: 0141 226 2265
F: 0141 248 6699
W: www.rock-dcm.com
Dear Mr Mearns

Town and Country Planning (Scotland) Acts
Main Issues Report and Draft Environmental Report
Loch Lomond & The Trossachs National Park Authority

Thank you for your consultation letter which SEPA received on 29 April 2014. We welcome the opportunity to comment on the Main Issues Report (MIR) for the Local Development Plan for Loch Lomond & the Trossachs National Park Authority.

In general we found that the MIR clearly sets out the main issues, opportunities and alternatives. We support the general approach to new development taken by the National Park of directing the majority of it to existing settlements.

We have provided some general comments below. Our comments on the site allocations with regards to the water environment are provided in appendix 1 below and a review of the policies is provided in appendix 2. Our detailed flood risk comments will be sent as a separate excel spreadsheet. The site specific comments should be read in conjunction with our comments and spreadsheets sent in response to the call for sites analysis sent in our letter dated 26 August 2013.

General comments
It is noted that the Main Issues Report focuses on areas of change and in general the current framework of policies in the Local Plan remain relevant and will be brought forward with some minor amendments for inclusion in the proposed plan. We welcome the inclusion of sustainability and flood risk management as overarching themes in the Local Development Plan. The Flood Risk Management section in the proposed plan should refer to the general duty of Responsible Authorities to reduce overall flood risk.

Tourism and visitor experience, and housing are also recognised as important issues for the National Park and overarching themes. We welcome the proposal to continue to direct the majority of new development to existing towns and villages. It is noted however that there is a desire to provide flexibility to allow currently unplanned developments to take place. This is linked to looking at alternative approaches to support low impact and informal camping.
We recently met with the National Park Authority to discuss working together in the early identification and screening of potential informal camping locations. It was agreed that the way forward is to produce a strategic report identifying potential sites this would assist in identifying sites which require consultation with SEPA and allow identification of problematical sites.

We appreciate the extent to which Loch Lomond and The Trossachs National Park Authority have involved us in the preparation of the MIR and we look forward to continuing working with you on the plan.

If you have any queries relating to this letter, please contact me by telephone on 01698 839 000 or e-mail at planning.sw@sepa.org.uk.

Yours sincerely,

Lorna Maclean
Senior Planning Officer
Planning Service

Disclaimer

This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at the planning stage. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning application. However, we consider it to be at the applicant’s commercial risk if any significant changes required during the regulatory stage necessitate a further planning application and/or neighbour notification or advertising. We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue. If you did not specifically request advice on flood risk, then advice will not have been provided on this issue. Further information on our consultation arrangements generally can be found in How and when to consult SEPA, and on flood risk specifically in the SEPA-Planning Authority Protocol.
Appendix 1
Site specific comments

Foul Drainage

In line with adopted local plan policy ENV11 and SEPA’s guidance on waste water drainage all development within or adjacent to publicly sewered areas must connect to the public network. Table 1 below highlights sites where there may be limited capacity in public systems.

<table>
<thead>
<tr>
<th>Site</th>
<th>Foul Drainage comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>All Callander sites</td>
<td>Callander sewage treatment works is hydraulically overloaded. The opportunity to remove surface water from the combined sewer should be taken. The applicant should discuss connection to the public sewer with Scottish Water.</td>
</tr>
<tr>
<td>Site ref. 59 Auchenlaich, Cambusmore Estate</td>
<td>The foul sewage from this site should be connected to public sewer (200m away) this could link in with foul sewage from Callander East site (RA1) and also allow existing developments at Keltie Bridge (14 houses) and Keltie Bridge caravan site to be connected to the foul sewer. Private sewage discharges are likely to exacerbate existing phosphorus pressure on River Teith SAC.</td>
</tr>
<tr>
<td>Gartocharn, France Farm (H18)</td>
<td>There may be capacity issues.</td>
</tr>
<tr>
<td>Drymen South Rural Activity Area (local plan site RA2)</td>
<td>Site is adjacent to Buchanan Castle STW. Issues with capacity in network and STW. The applicant should contact Scottish Water to discuss connection. May need developer contribution to upgrade.</td>
</tr>
<tr>
<td>Drumbeg, near Drymen (local plan site ST12)</td>
<td>No public sewer nearby. Would require private treatment but limited capacity in water environment. Constrained site therefore.</td>
</tr>
<tr>
<td>Croftamie, Buchanan Crescent (local plan site H15)</td>
<td>The Scottish Water septic tank has no spare capacity. This is therefore a constrained site. We would not want a private system so request discussions between developer and Scottish Water. Potential for impact on the Catter Burn due to location of development: morphology and point source impacts.</td>
</tr>
<tr>
<td>Croftamie, Main Street (local plan site LH2)</td>
<td>The Scottish Water septic tank has no spare capacity. This is therefore a constrained site. We would not want a private system so request discussions between developer and Scottish Water. Potential for impact on the Catter Burn due to location of development: morphology and point source impacts.</td>
</tr>
</tbody>
</table>
Lack of detail on nature of tourism development. Connect to Scottish Water system for any wastewater discharge. May be issue with connection due to nearest sewer being several hundred metres to the south but this is preferred option.

Table 2: Summary of water environment developer site requirements and comments

<table>
<thead>
<tr>
<th>Site</th>
<th>Water Environment comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ref. 59, Auchenlaich, Cambusmore Estate (ST9)</td>
<td>There is a ditch which flows through the site which is visible on 1:25 K map. There is the opportunity to make this ditch more natural in morphology.</td>
</tr>
<tr>
<td>Tarbet, central green area south east of Tarbet hotel (ST15) and former Harvey’s garage site (ST16)</td>
<td>Sites currently have morphology pressures, there could be the opportunity for restoration that could reduce existing pressures.</td>
</tr>
<tr>
<td>Callander East (local plan site RA1)</td>
<td>Keltie Water forms S boundary of site and large pond is within N area of site. Buffer strips needed for these areas of water. Public sewer is 500m from site - consider requiring a foul sewer connection here - see comments on Auchenlaich above</td>
</tr>
<tr>
<td>Ref. 82 Luss, land to north of Loch Lomond Arms hotel and site north of Colquhoun Arms (H25)</td>
<td>Buffer strip required. There is a culverted burn nearby which has a small section open, opportunities to open up more should be looked at. This should not be closed for land gain.</td>
</tr>
<tr>
<td>Drumbeg, near Drymen (local plan site ST12)</td>
<td>Buffer strip required, there may be restoration opportunities</td>
</tr>
<tr>
<td>MIR62, Drymen, site north of graveyard</td>
<td>Buffer strip required, there may be restoration opportunities</td>
</tr>
<tr>
<td>Croftamie, Buchanan Crescent (local plan site H15)</td>
<td>Buffer strip required, there may be restoration opportunities</td>
</tr>
<tr>
<td>Balmaha (local plan site T4)</td>
<td>Buffer strip required, there may be restoration opportunities. Looks as if this is an upgrade to existing infrastructure. Loch Lomond has morphological pressures and more structures will add to this. Seek to get the existing ones and new to reduce morphological impact. It is recognised this will be small scale. CAR engineering aspects to be considered.</td>
</tr>
<tr>
<td>Balloch, Woodbank House (local plan ST5)</td>
<td>Small watercourse along site boundary so principle of no deterioration applies. Buffer strip required there may be restoration opportunities.</td>
</tr>
<tr>
<td>Balloch, Loch Lomond Shores/West Riverside (local plan ST6)</td>
<td>There are small burns nearby which may be impacted by the development. This is a large site so potential for detrimental impact. Opportunities to make improvements but need specific detail on proposal. Buffer strip required. Restoration could contribute to reducing RBMP morphology pressure.</td>
</tr>
<tr>
<td>Balloch, The Old Station (local plan ST7/T2)</td>
<td>Buffer strip required. Restoration could contribute to reducing current morphology pressures.</td>
</tr>
<tr>
<td>Balloch, St Kessogs, East Riverside and Moss O’Balloch (local plan site ST8)</td>
<td>Possibly a small watercourse nearby so could this be uncultverted. Buffer strip required. Restoration could contribute to reducing RBMP morphology pressure.</td>
</tr>
</tbody>
</table>
Loch Lomond Shores Balloch (local plan site T3)  
This appears to be the project covered by CAR S 1103044 and 45 dredging and pontoon construction. The plan in the 'local plan' appears to be that site. If so no requirement for further comment as covered by licences. If not, please advise.

Cobblers Rest (local plan site H2)  
Unable to access site plans so can't comment on extent of site in relation to waterbodies nearby. Loch Long to the north and burn to the east. Potential impact. Connect to ScW sewer; assess capacity of network and septic tank. ScW pumping station to the west of the site.

Arrochar (local plan ST2/CU1)  
Unable to access site plans so can't comment on extent of site in relation to waterbodies nearby. Loch Long to the north and burn to the east. Potential impact. Connect to ScW sewer; assess capacity of network and septic tank. ScW pumping station to the west of the site.

Table 3: Recommended buffer strip widths

<table>
<thead>
<tr>
<th>Width of watercourse</th>
<th>Width of buffer strip</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than 1m</td>
<td>6m buffer</td>
</tr>
<tr>
<td>1-5 m</td>
<td>12 m</td>
</tr>
<tr>
<td>5- 15 m</td>
<td>20 m</td>
</tr>
<tr>
<td>15 m +</td>
<td>30 m +</td>
</tr>
</tbody>
</table>
Appendix 2

Policy Review

Do you agree with the potential retention/changes to each policy outlined?

Significant updates to policies HOUS4 and ED3 are proposed to introduce greater flexibility towards appropriate development; we would highlight that where no public sewerage infrastructure exists the private sewerage system must meet SEPA standards for the protection of the environment under CAR. Generally this will present no insurmountable obstacle however some areas are constrained by the proliferation of private systems to the point that discharges of treated sewage may require enhanced treatment to meet environmental standards. We have published a layer on GIS which highlights such areas and we recommend that the proposed plan refers to or contains a link to this information.

Ch.4 Enabling & Management Policies

Water Environment

The National Parks Authority is designated as a Responsible Authority in the RBMP process and is represented well in the RBMP process through the Area Advisory groups that cover the LL & TTNP area and also through the National Advisory Group. A consultation on the development of the second River Basin Management Plan (2015 - 2021) will be published in December 2014 and LL & TTNP Authority will be asked to input into this. We will also be involving LL & TTNP Authority in engagement work to look at setting objectives for the pressures affecting the waterbodies within the National Park area. This engagement work will ensure that proportionate and feasible objectives to protect and improve the water environment within the LL & TTNP Authority are set.

The Local Plan 2010 - 2015 identifies the need to protect and enhance the water environment through ENV 10, 11, 12 and 13. We support the retention of these policies in the proposed plan and would make the following comments on these policies.

Policy ENV12 Surface Water Drainage

We request that policy ENV12 includes reference to construction phase SUDS as this is a legal requirement. Further information on the requirement of construction phase SUDS can be found in our regulatory guidance, WAT-RM-08: Regulation of Sustainable Urban Drainage Systems (SUDS).

Policy ENV13 River Engineering Works and Culverts

We recommend that this policy should be renamed, “Engineering in the Water Environment”. The policy in the adopted local plan is very focused on river and culverts. The policy should incorporate impacts on the water environment in lochs and coastal waters as well as on rivers and all types of engineering not just culverts. These developments are covered through the Water Environment (Controlled Activities)(Scotland) regulations 2011 (as amended) but it is also worth noting that opportunities lie where engineering works are being carried out to make improvements to existing engineering impacts and alleviate pressure on the water environment.
Sustainable Flood Management

SEPA’s new flood maps are now available and contain more information than the previous maps including flooding from surface water. The new SPP also contains a section on surface water flooding. We request that the flood risk policy ENV16 explicitly refers to surface water flooding.

Renewable Energy

We also welcome the retention of policies REN1, REN2 and REN3.

Sustainable Waste Management

We consider that retention of the existing policy wording in WAS1 is appropriate. We consider that retention of the existing policy wording in WAS2, subject to some minor amendments is appropriate. Point (a) should be amended to remove reference to Area Waste Plans, as these have been superseded by the Zero Waste Plan. We recommend that point (c) is removed as there is no requirement through national planning policy for “BPEO” to be demonstrated.