

Safeguarding Facilities Guidance

Summary of comments

01 Gartmore CC/Gartmore Community Trust – We understand the reason for the policies but places are dynamic so room for change should be possible. There needs to be a degree of flexibility because each situation is unique and may require a different approach. The policy on length of time for properties to vacant impacts on individual freedom of choice and their individual circumstances.

02 Private Individual – Agree with the reason for safeguard local facilities and businesses particularly in smaller towns and villages. Agree that pubs and food/drink outlets are listed as there are some areas that they are very few and they are vital to local communities in providing democratic space without any forced parameters for conservation or debate. Agree with the level of supporting information but a case-by-case approach is needed as to when supporting information is required, particularly for isolated retail units. I particularly agree that situations where a business has failed or been vacant without necessarily active marketing should be a material consideration and evidence as to why the business failed should be submitted. 12 months is considered long enough. The abundance of dwellings changing to holiday lets is very concerning as there are fewer homes for local people.

03 Kilmaronock Community Council – Agree with the reason for the policies. In general, we agree with the list of community facilities listed but there is too much biased towards protecting visitor interests rather than local residents e.g. loss of car parks in Balloch has significant impact on residents. Car parks should be protected without consideration of replacement facilities. Bus stops, play areas and cafes (where there is only one) should be safeguarded. Public toilets should be protected. Can Public Parks and Gardens be added to the class order.

For supporting information – do not agree. if a business is not viable, it will close and these policies will not alter that. The policies will not encourage vibrant and thriving communities. They will inhibit change and there is a danger of properties lying empty in excess of one year given the lengthy planning process. The policy makes the planning process more expensive and stifles development. It inhibits change of use – some of which might meet aim 4 – promote sustainable economic and social development in areas' communities. The views of the affected community should however be taken into account in the planning process. There is cost to providing supporting information for a struggling business that is already short of cash. The required format and level of detail should be more transparent and easier to provide.

12 months marketing – it is too long and change of use is not always a threat to safeguarding the use but could facilitate it and encourage it before loss of value. Delay can cause projects to fail and too much regulation can be counter productive. Investors will go elsewhere. Appreciate genuine requests need to be separated from the chaff but a time limit is indicative of some businesses may be able to absorb and others won't.

Final comments – change of visitor accommodation to permanent residences should be encouraged. There should be the same scrutiny of change of use from residential to tourism (short-term lets).

04 Private Individual – Agree with the reasons for the policies. Too many buildings along Callander Main Street are in state of decay and have a high detrimental impact on the town and residents and visitors so change of use would be preferable to doing nothing. The guidance doesn't make it obvious that the National Park has powers to force landlords to take action. Absentee landlords seems to have invested little in the community so any way that community ownership can be encouraged then this would be beneficial. Discretion is needed across the different proposals and more involvement of the community checking and using local knowledge, history and impact. In terms of current policy, 12 months is too long and a building deteriorates and becomes an eyesore. There should only be deviations under special circumstances and with wide publicity of the reasons. Community involvement is essential.

05 Loch Lomond and the Trossachs Countryside Trust – Agree and no detailed comments.

06 British Horse Society – No comments.

07 Stirling Council, Transport Development Team – No comments.

08 Scottish Government Development Plans Team – SPP notes that when directing the right development to the right place that the planning system should consider the re-use or re-development of brownfield land before new development takes place on greenfield sites. The Draft NPF4 proposes a stronger policy intent in relation to Vacant and Derelict Land and buildings. LLTNPA may wish to consider if/how this stronger policy emphasis might be considered in relation to the guidance. I.e. NPF4 proposes a stronger policy position in regard to the reuse of vacant land and buildings.

09 Sportscotland – Community Facilities Policy 1 – We support this however the national planning policy applying to outdoor sports facilities is slightly different in emphasis to what is included in this policy. The two approaches aren't mutually exclusive but we would request that reference is made to SPP para 226 or new draft NPF4 for clarity.

10 Private Individual – Agree with the reasons for the policies. Do not agree with the detail as business, economies are all fluid and changing all the time. Such tight controls could end up with empty and run-down properties for long period of time. The market should lead for what is needed. Therefore do not agree with the level of supporting information being required. To be so strict on change of use is not necessary. Things evolve, people's circumstances and need change. We need homes to come onto the market to encourage more people to live in the National Park. Most people do not want to live in a holiday resort and this will put people off living here.

11 Luss and Arden Community Council – The emphasis is wrong about residential experience. Consideration of this is completely missing and is wrong. The continuing emphasis on and loading of consultation towards visitor experience, irrespective of know and well-documented damage already done by uncontrolled over tourism to the quality of life of residents at Park's hotspots is foolish and dangerous.

The needs of communities – like Luss or Callander – are very different. Any attempt to construct one-size fits all approach is wholly inappropriate due to different needs between locations and communities. Involving community experience is necessary to inform and facilitate appropriate local strategies.

The sustainability of Luss is under sever threat due to outdated and inappropriate planning policies failing to meet the housing needs of local people with a biased towards providing additional short-term holiday rental properties. A sustained and noticeably rising trend of second home ownership which threatens to rip the heart out of our community. Profound lack of affordable housing for young people.

The Park's mission is to sustain and nurture communities within the National Park, this is simply not happening and is not supported by these documents.

12 Sustrans – No comments.

13 Strathclyde Passenger Transport (SPT) – No comments.

14 Scottish Environment Protection Agency (SEPA) – No comments.

15 Historic Environment Scotland (HES) – No comments.

16 Transport Scotland – No comments.

17 Private Individual – Comments were provided to suggest amended wording in relation to the guidance on the Use Classes Order and where planning permission may be required.