**Submission Statement**

Dear Planning Authority

Please find attached and linked, a digital copy of the Proposed *Kilmaronock Local Place Plan (LPP)*.

**Community Body**

The community body submitting this LPP is **Kilmaronock Community Council** and **Kilmaronock Community Trust**. Our community body’s contact details are:

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| *Andrew Sinnott - Secretary KCC**South Stables Cottage,* *Boturich Estate,**Balloch, Alexandria G83 8LX**secretary@kilmaronockcc.org**Tel. 07785 703392* | *Bob Shand – Chair KCT**Tullochan Beag,**Gartocharn, Alexandria G83 8ND**kct@gartocharn.org**Tel. 07715 546072* |

**Supporting Information**

Attached or linked is information supporting the LPP or documents referred to in the LPP:

* A copy of the Information Notice sent to all councillors and adjoining CCs
* Description of LPP Process document
* Project Plan
* NPF4 Mapping document
* Community consultation responses

**Consultation Evidence – Information Notice**

A copy of the information notice sent to councillors and community councils has been included as an attachment to this submission.

As part of this process, the locally elected LLTNPA board member was included with the locally elected WDC councillors. Where a neighbouring area has no active Community Council, a Community Development Trust was notified in its place.

No changes to the existing Local Place Plan were required or made following the 28 day consultation.

**Statement Showing Regard to Other Plans/Strategies**

In preparing the LPP, our community body has had regard to the [National Planning Framework 4](https://www.gov.scot/publications/national-planning-framework-4/), which aims to create sustainable, liveable and productive places. These national policies are reflected in the priorities and actions summarised in the following sections of the Local Place Plan:

See attached document **NPF4 Mapping**

This plan has also taken account of:

* Loch Lomond and the Trossachs [Local Development Plan](https://www.lochlomond-trossachs.org/planning/planning-guidance/local-development-plan/) adopted in 2016 – which vision is to create thriving town and villages centres, more active travel options and off-road connections, a thriving economically active rural economy, support the needs of everyone, safeguarding historic buildings and precious natural and cultural assets as well as high quality development that enhances towns and villages
* Loch Lomond and the Trossachs [National Park Plan 2018-2023](https://www.lochlomond-trossachs.org/park-authority/what-we-do/national-park-partnership-plan-2018-2023/#:~:text=What%20is%20the%20National%20Park,future%20for%20this%20iconic%20place.)
* [Delivery of Housing in the National Park](https://www.lochlomond-trossachs.org/planning/planning-guidance/delivery-of-housing-in-the-national-park/)
* [The National Park Place Programme](https://www.lochlomond-trossachs.org/place-programme/)
* [Outdoor Recreation Plan](https://www.lochlomond-trossachs.org/park-authority/publications/outdoor-recreation-plan/)

**Engagement evidence**

Our community body has demonstrated that there is support for the priorities and proposals in our LPP as demonstrated in the information set out on pages.

EITHER WITHIN THE LPP OR HERE, THE FOLLOWING MUST BE PROVIDED:

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| 1. A brief description of the engagement and consultation activity or activities
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| 1. An estimation of the number of interests of people/organisations involved (that would be in a survey or workshop)
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| 1. A summary of the views expressed in both support and opposition
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See attached documents **Description of LPP process** and **Preliminary Analysis**

**Statement Setting Out LDP Amendments**

This LPP requires the following amendments be made to the current Local Development Plan 2016 and its successor.

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| --- | --- | --- |
| Top Priorities in LPP relevant to LDP and NPPP | Detailed Actions in LPP | Suggested amendment/consideration for LDP or NPPP |
| Living Well Locally : Housing/PlanningImprove housing mobility for young & old by increasing stock of smaller and more affordable properties.Enable elderly or disabled residents to remain in their community. | *Prioritise development of small scale housing of 2-3 bedrooms being over more substantial properties.* *Promote development of housing for rental rather than sale.**Promote development of single storey housing to benefit elderly or less able bodied persons.**Insert a disability category to the LDP Housing Policy on new residential housing in rural areas.* | See LPP Map 8NPPP Action p97: *“Through the National Park Authority’s planning role and working with housing partners, ensure new housing more closely corresponds to identified requirements of communities and the local labour force”*. NPPP Objective p103: *“Housing within the National Park better meets the needs of young and working-age people who want to work and live in the National Park, directly supporting the rural economy and vibrant rural communities”*.NPPP Action p103: “*Through the new Local Development Plan, ensure that new housing responds to meeting local housing needs of both communities and the rural economy though a continued focus on affordable housing provision and securing delivery of a broader range of housing types and tenures”*.LDP Gartocharn p69, H1 & H2 housing allocation.LDP Housing Policy 1: “*A range of house types, sizes and tenures will be provided on all sites to help meet the needs of everyone living and working within the National Park”*.LDP Housing Policy 2: “*Sites for 4 or more homes shall provide for affordable housing needs in accordance with Affordable Housing Requirements”*.**Addition to LDP H2 (c & d) to include a clause for disability (i.e. accessible housing).****Consideration in the LDP for policy update to weigh in favour of smaller houses during planning assessment.** |
| Living Well Locally : Housing/PlanningExpand the village envelope to make use of some unproductive land, provide economic benefit to landowners, contribute to the housing supply and disperse development from a crowded central location.Limit impact of multiple unit developments on existing infrastructure and amenities. | *Allow sympathetic infill housing out with the village envelope – the opposite of clumping (massing).* *Any multiple unit developments to provide infrastructure impact assessment e.g. travel plan to major hubs, population equivalent values for public Water & Sewage use, traffic effects (access & egress to road network), off road parking, EV charging facilities etc.* | See LPP Map 8LDP Housing Policy 2: “*Each site shall be developed to a density which is in keeping”*.LDP Housing Policy 2: will be supported “*where new housing is sensitive to the scale and character of the host small rural community or where a new house/new houses will help reinforce the character of an existing building group”*.**Consideration in the LDP for full community consultation for any housing development.****Consideration in the LDP that sewerage capacity taken into account during planning assessment.** |
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| Living Well Locally : Housing/PlanningTackling climate change with improved housing stock.Improve environmental protection in rural areas that are not connected to waste infrastructure. | *Promote development of Carbon neutral housing within LDP Housing Policies for obvious benefit to counter Climate Change.**This applies to alterations as much as new builds.**Place more weight on statutory consultees SEPA & Scottish Water to deliver stronger assessments of impacts of sewage treatment whenever an application proposes a discharge to any watercourse.* | See LPP map 8LDP Overarching Policy 1: *“Reducing greenhouse gas emissions through sustainable design; use of energy efficient materials, passive solar design, landscaping and micro renewables, connecting or creating opportunities to a shared heating scheme”***Amendment to ensure that planning policy considers support for householders and businesses to incorporate green measures in conservation areas, and that new houses should be ‘eco-homes’.**NPPP Objective: *“To increase the quality, naturalness, and health of freshwater and marine bodies in the National Park”***Consideration to work together to improve loch and catchment management in NPPP.**LDP Natural Environment Policy 11 - Protecting the Water Environment – *clauses (a)(b) & (e)*LDP Natural Environment Policy 12 - Surface Water and Waste Water Management**Consideration that private sewerage treatment process is taken into account during planning assessment.** |
| Living Well Locally : Housing/PlanningPreserving the character of the land and preserving bio-diversity. | *Provision of a clear statement of intent that the LLTNPA will be rigorous in up holding land designations and will act in support of the Scottish Government’s ambition to increase the area they cover from 18% to 30%.* | See map 2aNPPP Objective: *“To increase the number, species diversity and health of trees across suitable areas of the National Park”* NPPP Objective: *“Reduce grazing, browsing and trampling pressures in order to promote recovery of key habitats and sites”*NPPP Action: *“Encourage and support more projects and proposals that deliver healthy and diverse tree and shrub habitats in suitable landscapes in the National Park”***Consideration in the NPPP for more partnership working.** |
| Living Well Locally : Amenities & FacilitiesPromote provision and retention of local amenities and facilities that will help communities reduce their travel footprint. | *Improve scrutiny of change of use classes that impact on community facilities including pubs, cafés, shops, toilets etc.* | See LPP maps 3, 4, 6 & 7 LDP Community Facilities Policy 1*“The change of use of a community facility to other uses will* ***generally not be supported*** *unless it can be demonstrated beyond reasonable doubt that it is not viable to continue operating as a community facility by: Clauses (a) & (b)”*Safeguarding Policies Planning GuidanceAppendix 1 – Use Class 3 – Food and Drink *“Local Development Plan 2017-2021 - Economic Development Policy 3 and/or Community Facilities Policy 1 may be relevant if it provides a* ***valuable*** *community facility (only café/restaurant in a village) and or Visitor Experience Policy 3 if the café/restaurant provides for mainly visitors.”***Consideration in the LDP for full community consultation in the case of valuable community facilities being lost.** |
| Living Well Locally : Amenities & FacilitiesPromote sustainable travel and improved active travel options linked to a functioning public transport network. | *Liaise across council borders with Transport providers to coordinate public transport services that connect villages across council boundaries with each other and the major transport hubs.* | See LPP maps 3, 4, 6 & 7 NPPP p62 – *“Public Transport - Improving public transport options for travelling to and within the National Park including: Encouraging more convenient services to popular destinations and providing better travel information at strategic transport hubs surrounding the Park.”*NPPP p87 – *“Local Services - Supporting improved local service delivery and infrastructure, safeguarding rural facilities, including improving public transport links in and around the National Park.”***Consideration in the NPPP to hold perodic stakeholder reviews of Public Transport services linking across the National Park and surrounds.**LDP Transport Policy 1 - Safeguarding sites to Improve the Transport networkLDP Transport Policy 2 - Promoting sustainable Travel and Improved active Travel options (clauses a, b & d).**Consideration in the LDP for a requirement to describe proposed Public Transport connectivity for any new developments, housing or recreational.** |
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| Natural Open SpacesImprove management and enjoyment of Natural Open Spaces in the area. | *Promote provision for habitat restoration in development applications either as part of the development or developer contribution to a community accessible fund.* | See LPP map 2a, 4 & 5LDP Natural Environment Policy 5 - Species and Habitats*“Development that would have an adverse impact (including cumulative impact) on habitats or species identified in the National Park Biodiversity Action Plan which occur in the National Park will only be permitted where: clauses (a)(b)(c)”*LDP Natural Environment Policy 6 - Enhancing Biodiversity*“Developments will be required to enhance**biodiversity by: clauses (a)(b)”***Consideration to the LDP to have a policy for developers to fund habitat and biodiversity enhancement**  |
| Natural Open SpacesImprove management and enjoyment of Natural Open Spaces in the area. | *Promote enjoyment of managed Natural Space by improving accessibility by sustainable means e.g. safe routes for walking, cycling, wheelchair use.**Improve connectivity between popular sites via said safe routes.* | See LPP maps 2a. 4 & 5NPPP p50 - *“Paths Network… the existing paths network needs to be improved with some additional strategic links being created, improvements to local paths and finding long term solutions to ensure the overall network is maintained and promoted to a high standard.”***Consideration in the NPPP for more partnership working particularly around funding sources** |
| Paths and CyclewaysEncourage Active Travel | *Take more responsibility in maintenance and improvement of the existing path network by having good Landowner Agreements in place for Rights of Way and Core Paths at the very least.**Reduce the bureaucratic burden on Community Bodies who are engaged in projects to maintain and improve paths on the behalf of LLTNPA and actively assist Community Bodies in accessing funding for Active Travel projects large and small.* | See LPP map 4NPPP Objective: *“Promoting Visitor Safety: A co-ordinated approach will be taken across responsible bodies to ensure the safe enjoyment of publicly managed and other popular visitor sites.”*NPPP Action: *“raise awareness of public safety issues and potential hazards in the outdoors, particularly in relation to water safety.”***Consideration for safe walking and wheeling routes in LDP and NPPP.**NPPP Objective: “Investment in the National Park’s recreational path network will focus on keeping the existing network and statutory core paths in good condition”. **Consideration for partnership working in NPPP.**LDP Transport Policy 2 – *“ All development proposals will make a positive contribution towards encouraging safe, sustainable travel and improving active travel options throughout the Park by enabling opportunities for: (d) New and improved links to existing and proposed walking and cycling routes, as described in the Core Path Plan and included in the National Walking and Cycling Network (NWCN).”***Consideration of the requirement for formal landowner agreements to define the maintenance responsibilities of core paths prior to designation of core paths and at every review of existing core paths.** |
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| Enjoyment of Outdoor Spaces by allEnhance public enjoyment of outdoor spaces.Reduce instances of anti-social behaviour.Encourage preservation of outdoor spaces. | *More investment in outdoor education. This could be in schools at all age levels, online resources through social media, public facing online presences not just LLTNPA website and make leaflets available all tourist accommodation providers.**Encourage Community Councils and Development Trusts to promote the**educational material and the work of partners such as the Royal Highland Educational Trust (RHET).* | See LPP Map 2aNPPP Objective: *“Outreach and outdoor learning programmes are focused on building understanding of the challenges facing our planet, inspiring action for nature and climate and promoting the wellbeing benefits of enjoying the outdoors.”***Consideration for partnership working included in NPPP.**NPPP Action p76: *“Jointly plan visitor management with partners to ensure a co-ordinated approach to staff presence on the ground, litter management, visitor information campaigns and operation of publicly managed visitor facilities”.***Consideration of more community partnership working in NPPP to educate outdoor users.***NPPP Objective: “To ensure a strong partnership approach to co-ordinating all public bodies with a role in supporting the safe and responsible enjoyment of the National Park.”**NPPP Action: “plan visitor management with partners to ensure a co-ordinated approach to staff presence on the ground, litter management…”**NPPP Objective: “To increase the quality, naturalness, and health of freshwater and marine bodies in the National Park”***Consideration to work together to improve loch & lochside management in NPPP.** |
| Pollution / protection of natural resourcesReduce pollution and increase protection of our natural resources | *Take more responsibility in tackling litter throughout the National Park not just on LLTNPA owned land* *Liaise with Local Authorities, Community Councils and Development Trusts to remove or prevent litter.**Continue the Seasonal reviews with all Stakeholders to maintain a priority list of infrastructure improvement needs and encourage existing and future tourism providers to participate in provision of parking, bins and toilet facilities.**Require SEPA responses to all Planning**Applications involving ANY discharge of sewage outflows to a water course.**Take the lead with WDC, SW & SEPA to raise awareness and monitor run-off water quality for continual improvement.* | See LPP maps 21, 5 & 7NPPP Action p76: *“Jointly plan visitor management with partners to ensure a co-ordinated approach to staff presence on the ground, litter management, visitor information campaigns and operation of publicly managed visitor facilities”.***Consideration of more community partnership working in NPPP to mitigate visitor impacts.**NPPP Objective: *“To increase the quality, naturalness, and health of freshwater and marine bodies in the National Park”***Consideration to work together to improve loch and catchment management in NPPP.**LDP Natural Environment Policy 11 - Protecting the Water Environment – *clauses (a)(b) & (e)*LDP Natural Environment Policy 12 - Surface Water and Waste Water Management**Consideration that sewerage capacity taken into account during planning assessment.** |

**Community’s Submission Statement Appendix Checklist**:

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| To Do |  Done |
| 1. A digital copy or link to the Local Place Plan so it can be downloaded.
 | Yes |
| 1. A copy of the written constitution of the community body if not a community council
 | N/A  |
| 1. Copy of *Information Notice*
 | Yes |
| 1. Copies of any other documents referred to in LPP (not NPA docs)
 | Yes |