



SCOTTISH COUNCIL FOR NATIONAL PARKS

Loch Lomond and the Trossachs National Park Local Plan: Response to consultation.

2. Planning and Development in the National Park

2.1 National Park Aims

Council welcomes the emphasis in Policy NP1 on the Sandford Principle which calls for the primacy of conservation in cases of irreconcilable conflict and also the application of the Precautionary Principle in cases where there is lack of knowledge or uncertainty of likely impacts. It is important that this is clearly understood and acted upon by all Board members who have responsibility for planning and development control matters.

3. Development Strategy

3.1 Our Vision.

We are generally supportive of the wording of the Vision for the Plan but would recommend a minor but significant change to the wording of line 2 to read,*quality, environmentally sustainable development*..... Unfortunately the word sustainable has been hijacked by the development industry so that a development which might be economically viable is then described as sustainable and the two are not the same. In a national park, environmental sustainability is an essential prerequisite.

3.2 Planning Context.

Population and Housing. If the Park is rightly not to provide new housing for people who are employed elsewhere ie commuters, the level of population will be a function of environmentally sustainable uses in the Park together with people living in existing accommodation over whom there is no influence. It is likely that established properties which go on sale will be bought mainly by better off people who may be in employment or retired but wish to enjoy the lifestyle and environment the park has to offer. Population loss is often caused because younger people cannot afford properties in the park and are forced to move out. Indeed, some may be in employment in the park and have to commute in, to get to work. This points to the need to place new housing emphasis almost entirely on local needs and affordable housing, not on open market speculative development. There is no ideal population level and the park cannot be viewed in isolation from its surroundings.

There is a mismatch between the level of new jobs likely to be created by the policies for growing the rural economy and tourism and the targets/locations for new housing. There is a danger of a significant proportion of the housing ending up being used by commuters and others not in employment within the Park unless more pro-active strategies and policies are adopted to deliver the additional local employment aspirations within the timeframe of the Local Plan.

3.4 Locational Strategy.

Council supports the principle of directing most new development to existing settlements but is concerned with the potential for encouraging a proliferation of housing in the countryside for which there is no functional case. A house being self-build is not a locational justification.

Small scale renewable energy schemes also need careful definition as this could have an adverse impact on the National Park's outstanding landscapes and environment despite some assurances and policies later in the Plan aimed at preventing this happening. The policies need to be more robust and the definition of small-scale renewable energy projects requires to be refined further as 20 metre high wind turbines in the National Park could be damaging and in conflict with landscape and conservation objectives.

3.5 Housing

Council welcomes the focus on affordable housing and choice of housing tenure. We have concerns however, about the means of attaining that goal. Considerable areas of the park are within commuting distance of the main centres of employment and population and therefore, a residency condition is going to play a significant role in achieving adequate provision of affordable and local needs housing. The vast majority of the existing housing in the park is currently available to all comers when it comes on the market. New house building is therefore, the only opportunity to meet local need and affordable demands. As such it requires very careful planning in terms of appropriate location and ensuring that it remains affordable in perpetuity.

There is, in our view, too much dependency on open market speculative housing, some of it in locations where there is little local employment. The likely buyers, in the absence of any residency requirement, are likely to be retired people or second home purchasers. This could increase the proportion of the population in the upper age ranges or in the case of second homes, do little to help sustain local services.

There are sites within the park, eg Gartness Road, Drymen which have a complex and inconsistent planning history with consequent difficulties of contributing to current needs. We understand that the inappropriate consents which have been granted in the past now have lapsed. The current plan is, therefore, a once and for all opportunity to revisit the future use of such sites and remove them from the housing land supply if the allocation is no longer appropriate. Planning should not only allocate land for specific purposes but change the allocation as necessary to meet current needs.

In deciding on the most appropriate sites to allocate for housing, the wider needs of the settlement for environmental improvement, traffic management, car parking and the public realm should be taken into account at the same time.

It is surely desirable for settlements to encompass change gradually and there seem to be certain areas where the number of new houses proposed seems excessive in comparison to the existing provision eg Ardentiny (+36 houses), Drymen (+91 houses).

3.6 Economic Development

It is disappointing but true that further work is required to gain a better understanding of economic development in the Park to inform future initiatives but it is a sad reflection on those agencies charged with economic development that this is the case. The prospects for addressing this topic adequately are not good given the recent changes in public agency organisational arrangements and the reduction in resources to tackle job creation within the Park. Councils and the Park Authority should adopt a more pro-active role in undertaking a review and identifying actions which will make a real difference. In the meantime it is sensible to retain and safeguard existing sites identified for economic development while opportunities to identify new sites are explored. The identification of four Rural Activity Areas for the

concentration of appropriate new and expanding businesses is welcome. Policies ED1-4 are supported.

There are lessons to be learnt from others such as the Peak District National Park, and Highlands and Islands Enterprise on how to deliver sustainable economic development in scenically sensitive rural areas and there would be merit in delivering some 'demonstration projects' within the Park to help stimulate economic development and prevent the continued stagnation of existing development sites.

3.7 Sustainable Tourism and Recreation

Whilst it is appropriate to focus on sustainable tourism development, it should be recognised that some categories of tourism facilities have a finite product lifecycle due to consumers changing preferences and expectation levels. Tourism development planning policies therefore, require to be flexible and sympathetic enough to allow for changes in the tourism product development mix and this is particularly the case in relation to tourist accommodation types where sometimes there has been a fairly rigid categorisation adopted by some planning authorities while in reality there has been more of a blurring in the market place between serviced and self-catering accommodation. There is a danger of the Park Authority falling into this same trap with some of the policies and statements in this section of the Local Plan and this could work against the National Park's vision of 'becoming a world class destination that promotes quality and investment in facilities and services'.

We are supportive of Policy TOUR1 but have some concern about the amount of emphasis being placed on tourism developer contributions being possibly required for wider issues such as transport, environmental enhancement and biodiversity within the Park. If this policy is overused it could hamper the viability and sustainability of some tourism developments and there are examples from elsewhere where this has been a contributory factor in delaying tourism projects going ahead. Emphasis is placed in areas outwith settlements on small-scale developments with a farm or other business diversification project but sight should not be lost of possible 'stand alone' opportunities for small-scale schemes in and around the Forest Parks.

The tourism development sites identified in Schedule 4 seem appropriate but we have concerns about the potential loss of the existing large site at Gart Holiday Park in Callander for housing despite provision being made for the development of a new and inferior site on the opposite side of the road for a new Holiday Park. The tourist accommodation base in Callander has already been severely eroded by speculative housing development on sites such as the former Tannochbrae Chalet Park and it would be difficult to replicate the quality and scale of the Gart Holiday Park which has previously won the accolade of 'Best Holiday Park in Britain' due to its parkland setting and the quality of facilities and services. Reference is made to safeguarding a site at Auchinlaich for static caravan provision when in fact this should be for touring provision at the Gart Holiday Park which is predominantly used by tourers. It is important that adequate provision is available for touring vans in the Callander area. We also have concerns, as mentioned previously, about potential housing ribbon development effect on one of the main approaches to the Park which is in danger of replicating some of the mistakes made with the development of Aviemore.

Woodbank House in Balloch has been in a dilapidated condition for many years and detracts from the quality of the southern approach to Loch Lomond. We therefore, welcome the identification of Woodbank House site for tourist development but this

site could be derelict for years to come unless a positive action is taken by the Park Authority to unlock its tourism development potential.

Proposals for the former torpedo range near Arrochar are welcome but there are dangers in being too prescriptive on the type of tourist accommodation to be provided.

We consider that Aberfoyle has a need for further tourism development given its important role as a gateway and service centre for the Trossachs and aims of the Destination Management Strategy previously developed. The village requires more tourist accommodation to counteract the 'drift' to being a predominantly day trip destination. There are some potential sites to the south of the existing village.

We welcome the reference to the Parkways which include the great journey experiences through the Park. It would be advantageous to include some cross references to the tourism opportunities identified here in the transport and access section where the impression is given that opportunities will **not** be taken to deliver improvements that enhance the visitor experience when road and rail upgrades are being taken forward. Also outwith planned route upgrading schemes some specific gateway stopping off/orientation/interpretative opportunities should be identified as this is still a major weakness on some approaches to the Park, particularly from the south-east (A84).

We have some concerns about the detail of Policy TOUR2 and the strict categorisation of tourism accommodation types given the changing preferences of visitors, the blurring of accommodation types in the market place and the dynamics of developing sustainable tourism enterprises. We accept the suggested guidance of timber holiday chalets(Ai) but would like to see a variation in the suggested camping and caravanning development policy (Aii) to better reflect emerging trends and assist with the sustainability of sites. The viability and sustainability of small to medium size touring sites is questionable and they generally need a mix of touring and static caravan stances/lodges/cottages. Why therefore is there a general presumption against static caravans, including the extension or replacement of existing sites? No justification for this is given in the Plan and this is potentially prejudicial to existing Park operators and the ambitions to grow tourism. As a result of innovations static caravans now come in a range of design forms which are more sensitive to the environment and provision should be allowed in the Plan for site upgrading and modest expansion with the use of caravan modules which meet prescribed design standards. There should also be more flexibility in allowing static vans to be replaced by high specification lodges/cottages reflecting the Park Authority design guidelines and the ambition to become a world class tourist destination. New 'cottage style' clusters of tourist accommodation should also be encouraged within the set of policies for tourism development as this is in line with the aspirations of visitors who are seeking higher standards of accommodation and also the Park Plan vision for quality and sustainable tourism.

We accept the need to continue to impose planning conditions or a Section 75 Legal Agreement to control occupancy of new holiday letting accommodation but this should not preclude the property being used throughout a 12 month period by different visitors. The historical policies of leaving properties vacant for a specific period each year should end given the growing trend to year round tourism and the growth in short breaks outwith the traditional holiday months.

Policy Tour3 is welcome as this should provide a more robust planning framework for rejecting proposals that would result in the loss of existing tourism sites to other

uses. There have been a number of instances in the past, particularly in the southern parts of the Park, where tourist accommodation has been lost due to higher site development values being achievable for housing. Support for proposals which enhance or improve existing tourist developments is also welcome as there are a number of existing tourist accommodation establishments which have plans to modernise, remodel and extend to cater for the current and future needs of visitors. The reference to 'small-scale expansion where appropriate' should be replaced with 'expansion where appropriate' as in some instances expansion requires to be more significant (e.g. coaching hotels) to remain sustainable. High design standards should still be achievable.

We are supportive of Policies REC1 and REC2 and Schedule 6 which details specific recreation opportunities/constraints within the Park but we have reservations about the Park's ability to manage intense recreational activity in some areas through land use policies alone. There needs to be more pro-active use of the Ranger Service and other visitor management techniques and in this context the recent announcement to get Rangers out on the ground interacting with visitors and local residents more is very welcome.

Council is concerned that the Plan does not address the problem of Jet-skis and Float planes neither of which should have a place in a national park.

3.8 Transport and Access

The limited number of transport infrastructure proposals in Schedule 7 is worthy of support but it is disappointing the list doesn't include the previously planned major A84/A85 improvement scheme north of Lochearnhead or a reference to the Parkway opportunities referred to in Schedule 5. Policies TRAN1-7 are supported but require to be backed up by a more pro-active approach to trying to secure a higher level of take up in transport inter-modal transfers. The proposals to develop a network of water-based transport services and linkages should be explored more fully with existing boat trip operators as this offers great potential to achieve some of the aims of the Park Plan including enhancing the quality of the visitor experience and reducing car travel around the lochs. Historically it has been easier to achieve public sector revenue support for land-based bus services but if there is to be a significant step change in how visitors get around and enjoy parts of the Park then serious consideration will require to be given to helping fund enhancements to water-based transport services and experiences with the trusts and private sector operators who are active and specialists in this field.

4. Enabling and Management Policies

4.1 Environment

Council is generally supportive of the policies in this section but to make clear the park's commitment to protecting important designations some could be reworded to state a 'presumption against unless.....' rather than the less firm wording *eg Policy ENV1 Natura 2000 Sites (SACs and SPAs) and Ramsar sites. Policy ENV6 Enhancing Biodiversity in New Developments* seems well meaning but unrealistic.

4.2 Sustainable Communities

We are generally supportive of policies in both the Environment and Sustainable Communities Sections but have some particular concerns as below.

Renewable Energy: Scale and Type

This section of the Plan causes Council great concern. Government has made clear, as far as it makes anything clear, that national park designation is an accolade of the highest order and that protection of the qualities which justified the designation must

be of a similarly high order. In Council's view, there is no place for commercial scale wind turbines in national parks and that is a stance that has been adopted and supported consistently throughout national parks in the UK. In landscape terms a 20mw windfarm is not medium or small. A 20mw windfarm would comprise ten, 100 metre high turbines or six or seven, 125 metre high turbines together with all the road building, trenches, substation, power lines, etc that go with it. All electricity generated goes to the national grid and brings no benefits, only detriment to the park area.

A national park is designated because of its high landscape value, sensitive habitats, cultural history and high conservation needs. **The Plan's policy, therefore, ought to be a clear presumption against commercial scale wind turbines unless there is some over-riding need in the national interest to support it.** Such a situation is highly unlikely and applications have been refused on appeal in less sensitive locations acknowledging that there was no national case to support them. A policy as written in the draft plan shows a failure to appreciate the true responsibility of caring for a national park. Every commercial scale wind turbine has some adverse impact on a good landscape. For users of the park for countryside recreation, wind turbines are a disaster.

In the reasoning, the plan also refers to small scale wind-turbine developments to serve local communities. If these are constructed as a commercial proposition, the energy will also go to the national grid with no benefit to the local community but possibly some financial benefit to an individual. Commercial developers of wind turbines have been in the habit of offering sums of money to local communities which in effect is an attempt to bribe them with their own money and such inducements should have no place in the planning process.

5. Action Programme and Monitoring

Some of the monitoring proposals planned are fairly weak. For example, under the Sustainable Tourism and Recreation Development theme, it is only proposed to undertake an annual audit of new tourism developments delivered in the National Park. In isolation this will not be an effective barometer of whether or not the sustainable tourism and recreation objectives and policies of the Plan are being achieved. A more comprehensive approach is required which should involve 'How's Business Surveys' which gauge occupancy/trading levels, emerging trends and future investment intentions. Similarly, under the Transport Infrastructure heading simply monitoring the number of projects and completions will not be an accurate or meaningful measure of the scale of modal shifts to more sustainable forms of transport including water based transport. It should be possible to secure the co-operation of transport operators and measure usage levels on an annual basis. Statistics for the use of car parks where there is a charge should also be readily available from local authorities and attraction operators(eg Callander and Luss Car Parks, David Marshall Lodge and Loch Katrine). Road traffic counts are also a useful barometer of trends and it is understood electronic counters are in place at various locations throughout the Park.

It will be interesting to see the level of investment planned for the Plan period in the revised Table 7: Overcoming Infrastructure Constraints and Table 8: Funding, Marketing and Promotion. It is unlikely they will come anywhere near matching the level required to achieve the implementation of the targets and policies in the Plan but this should help to scope out the scale of the challenges being faced in delivering the Local Plan outcomes and more generally in supporting the aims of the National Park.

To conclude.

The park has had to work with policies and development proposals inherited from predecessors with all the difficulties that can arise. However, when this plan is finally approved, it will be the vehicle for ensuring that the National Park Plan is put into practice. There are clear indications that the Board is still going through a learning curve and has some way to go before it can be said that there is a full appreciation of what it means to manage a national park. There have been development control decisions which do not reflect the Vision, the Sandford and Precautionary Principles eg the Hospice; Rowardennan Hotel; former Harvey's Garage; loss of valuable woodland to another golf course etc.

Ultimately, conservation for the long-term is the key factor in sustaining Scotland's first National Park and it will require an approach which is robust, clear, consistent and committed – and we wish the Park well in that task.