

Friends Of Loch Lomond And The Trossachs – response to Loch Lomond & The Trossachs National Park Finalised Draft Local Plan

2nd April 2010

1. National Park Aims (Local Plan, s2.1, PolicyNP1, p9)

We **support** the emphasis on the Sandford Principle in this overarching policy and we hope the Park Authority staff and members will uphold this policy when some of the more contentious forms of developments referred to in the draft Local Plan and supplementary guidance publications, such as wind farms, come before them for consideration.

It is not clear from all the detailed supporting guidance documentation when the Sandford Principle would come into play and we **recommend** that, in the same way that practical guidance is provided on a range of topics with illustrations of good and bad examples of design/development, there would be merit in adding some examples to demonstrate the application of the Sandford Principle where development proposals create conflict between the first and any of the other statutory National Park aims. This would be useful for those involved in determining planning applications as well as prospective developers.

2. Our Vision (Local Plan, s3.1, p11)

We **support** the overall vision for the Plan but are very disappointed that the suggested change to the second sentence **recommended** in the Scottish Council for National Parks response to the previous draft has not been acted upon. We concur with their view that the addition of the word '*environmentally*' in front of 'sustainable development' would emphasise the importance of all developments in the National Park being environmentally sustainable. It would also be helpful if a definition of sustainability was added in this section – the term has different meanings for different people and it is important that users of the final Local Plan are aware of this Park Authority's interpretation.

3. The Development Strategy (Local Plan, s3.3, p14-17)

We are in **agreement** with the four drivers which are listed as the basis for underpinning the Park's planning function but **recommend** under the third bullet point the second line should read '... to help conserve and **protect** the special qualities'. This would help to reinforce the importance of the International Union for Convention of Nature (IUCN) classification and the specific reference to the management of protected areas.

We **welcome** the emphasis being placed on issues such as sustainable and high quality design, green practices and safeguarding the environment on the first page of the summary development strategy schedule (*Table1, p15*) but we are concerned about some inconsistencies between the summary text under some headings such as Green Practices and the more worked up detailed sections on renewable energy policies (*Policy REN1 Wind Renewable Energy Projects, p84*) and the supporting technical guidance advice (*Draft Supplementary Guidance on Renewable Energy, p31-38*). In the summary the impression is given that the Park Authority will not support large-scale wind or hydro schemes and we **support** this position if this is the case. The summary then goes on to state 'the draft plan seeks to encourage more small-scale renewable energy projects such of run-of-river hydro and biomass' which in general we are **supportive** of too, but surprisingly no mention is made of the intention to encourage clusters of 'community wind farms' measuring up to 50 metres in height and consisting of between 1 and 6 turbines depending which element of the inconsistent guidance provided later in the draft Plan, and in the supplementary guidance documentation, is judged to be correct. We are **strongly opposed** to structures of this scale and nature within the Park and are very concerned about the extent of the Park area identified as 'being potentially suitable' for wind energy developments of this nature as this seems very much at odds with the ICUN protected landscape status of the Park and the statutory duty the Park Authority has 'to conserve and enhance the natural and cultural heritage of the area'. This is an issue that we will return to later in our submission as this is one of our **major objections** to the draft Plan and we will be urging the Park Authority to have a rethink on the wind energy development policy to help safeguard the special landscape and scenic qualities of the Park.

We are broadly **supportive** of the strategy for new development and land summarised on pages 16 and 17 with the **exception** of the housing strategy that we will return to later in our submission. The strategy on topics such as tourism, recreation economy and transport are generally clear and well thought through. We particularly **welcome** the focus on sustainable tourism linked to trying to establish the Park as an internationally recognised destination that provides an

exceptional visitor experience, and also the proposals to encourage investment in new and improved infrastructure on the sea lochs and Lochs Lomond, Katrine and Tay to support water transport opportunities. More needs to be made of the potential of heritage vessels such as SS Sir Walter Scott, PS Waverley and PS Maid of the Loch to enhance the visitor experience and overall enjoyment of the scenic splendour of the area and we are surprised that no specific mention is made of them in later sections (*e.g. Sustainable Tourism and Recreation-s3.7, p34-47; Transport and Access-s3.8, p47-52; and Historic and Built Environment-s4.1, p73-78*). We **recommend** this omission is addressed;

4. Locational Strategy (Local Plan, s3.4, p18-19)

We are interested to note the approach to the locational strategy outlined in this section, which it is acknowledged differs from previous and existing local plans. We do have some **concerns** about lifting restrictions on some forms of development in the countryside as the previous and existing plans have played an important role in protecting the special landscape and scenic qualities of the Park. We **welcome** the reference to applying the Sandford Principle when considering applications for development in the countryside but would also **urge caution** in not having too relaxed a regime as the decades of good work by previous planning authorities could be very quickly undermined and, more importantly, some of the outstanding scenic views in the Park could be irreparably damaged. We **recommend** that some additional training measures are put in place for Planning Officers and Park Board Members involved in processing and determining applications in the countryside, and indeed, also in the small rural settlements and the larger settlements. This should be linked to gaining a good understanding and appreciation of good design principles in a National Park context and the excellent *Sustainable Design Supplementary Planning Guidance* documentation prepared for the Park Authority by Anderson Bell Christie Architects.

5. Housing (Local Plan, s3.5, p20-27)

We generally are **supportive** of the view that the housing supply in the Park needs to be fit for purpose, meet the needs of its communities and support a healthy economy (p13) and we are relieved that the proposed housing allocations are more in line with projected demand than is proposed in the Cairngorms draft Local Plan. However we do have **major concerns** about the scale of allocations planned in some of the larger communities such as Drymen and Callander, which are coming under increasing pressure for speculative and high-density housing schemes to the detriment of the character of the settlements and their major roles as visitor 'gateways' to the Park. It is important that plans to increase housing do not

compromise their ability to perform this function effectively with the potential loss of valuable tourist business and potential car/coach parking sites to housing. We also have some concerns about the proposed method of trying to deliver more low cost housing but **agree** the emphasis does need to be on the delivery of local needs and affordable housing. Ideally local housing associations should be properly resourced to deliver a higher proportion of the affordable housing needs as the policy of heavy reliance on the private sector to deliver this type of housing as part of a sliding scale of the percentage mix of housing developments has a number of shortcomings. In most instances developers seek a higher density of development to maximise their profit margins and there are some recent examples where the scale and nature of the development detracts from the character of towns and villages in the Park.

In the Drymen area there has been a long history of speculative housing development pressures due to the proximity of Glasgow and the appeal to commuters. There are still some major outstanding issues relating to a housing proposal near the centre of the village (Gartness Road) which could result in the loss of much needed additional coach and car parking and amenity space that is urgently required if Drymen is to be properly developed as a thriving 'gateway' tourist and service village on east Loch Lomondside. We understand the current consents have now lapsed and given the Park Authority has an opportunity to start with a 'clean slate', linked to the adoption of the new Local Plan, we would **strongly recommend** that, given the strategic importance of this site in enabling Drymen to perform its role as a visitor service/gateway hub for East Loch Lomondside, it should be **removed** from the housing land supply and **safeguarded** for larger scale car parking provision and other appropriate tourist and recreational uses. This would tie in well with the Park Authority's wider objectives of strengthening visitor management arrangements on East Loch Lomondside. We also consider the allocation of part of this site for housing is no longer appropriate as there are proposals to provide an allocation for affordable housing in another part of the village and there is further potential as identified in our supplementary note on car parking and housing issues in Drymen.

The attached more detailed note on Drymen also sets out a clear and well argued case for retaining the Gartness Road site as **the strategic location** within the village for providing much needed enlarged car and coach parking and other tourist and recreational facilities to ensure the visitor service/gateway hub role can be properly met. We **recommend** the proposals set out in this supplementary note are adopted as part of the final Local Plan.

In the Callander area there has been a significant amount of high density new housing built on the Stirling approach to the town and this has resulted in the loss of valuable tourist

accommodation (Tannochbrae Holiday Park) and also the dilution of the 'sense of place' in what is an important tourist and day trip destination. We are **concerned** that this could be exacerbated by the loss of the large and high quality Gart Holiday Park to housing in the long-term. Apart from being one of the top touring caravan holiday parks in Britain (a previous winner of the Best British Holiday Park Award), it is located in an attractive and mature parkland setting on the entry to the town and makes a valuable contribution to Callander's overall setting. There is a real danger that giving this site over to high density housing could add further to the unattractive ribbon development visual effect that has emerged in recent years as a result of nearby housing developments. We are concerned about losing attractive parkland and valuable tourist accommodation. We are not convinced relocating the Park to another site is either realistic or desirable. We therefore **object** to the Gart Caravan Park being allocated as a potential long-term site for 174 houses and **request** that this is removed from the Housing Allocations Schedule on page 23.

We also wish to register our **strong objections** to the proposal to substantially abandon the current 'Local Needs Section 75' policy with the relaxation in the housing occupancy conditions referred to in *Policy HOUS1-New Housing Developments in Settlements* and *Policy HOUS2 Local Housing Needs in the Loch Lomondside Area*. We cannot understand why an 'in perpetuity local need' housing occupancy policy which has operated successfully for 45 years in the Loch Lomondside area is being diluted down with the replacement of a 10 year local occupancy condition. There is no justification for this given in either the draft Local Plan or the *Draft Supplementary Guidance on Affordable Housing* and we therefore **strongly recommend** the in perpetuity condition is re-instated. We are also concerned that if the 10 year rule is introduced retrospectively, as suggested, this is likely to have an immediate adverse impact on the availability of housing for 'local need' as some houses which go on the market will inevitably end up in the ownership of commuters and lifestyle retirees with no connections with the area, and at a much higher price, which will be outwith the reach of locals. This appears to be a 'political fix' as opposed to a policy with sound planning justifications. The 'in perpetuity' local need housing occupancy policy has been successfully introduced in National Parks throughout England and Wales as it has proved to be an effective mechanism for helping to ensure housing stock is available to support local housing priorities.

The current 'Local Needs Section 75' policy was introduced in 1965 to protect the south Loch Lomond villages of Tarbet, Luss, Gartocharn, and Croftamie in Dumbartonshire and was subsequently extended to include Drymen in Stirlingshire. The purpose of the policy was to protect the villages from the damage to their character and environment caused by unwanted additional housing development. The additional

housing threat at that time came from heavy pressure from 'open market' housing developers taking advantage of the strong market attractions of these villages in terms of location and proximity to Glasgow (Pressures that are still very extant).

The 'Local Needs Section 75' policy operates by restricting the granting of planning permission and subsequent sales only to local people and the Section 75 ensures that it goes on in perpetuity. This policy has proved very effective in defending the Loch Lomondside villages from damage from undesirable open market housing proposals. It has also been of considerable benefit to the local residents in materially lowering the price of building land and also to them by causing a lowering of the second hand price of such houses if and when are subsequently offered for sale. Although the operation of the policy has been unpopular with some people with land/or property interests, we understand all planning appeals against the policy were dismissed by Central Government. The policy has been consistently supported by the Friends and because of its proven benefit over 45 years, we wish to **strongly object** to the draft Local Plan's proposals to **reduce it to insignificance**.

Whereas this 'local needs' policy is currently applied to all housing developments in these lochside villages other than those houses in the 'affordable' category which are built by government agencies to be rented, the Draft Local Plan (*p10 Development Strategy Schedule – Housing*) proposes that it should only apply in future to a proportion of the windfall sites, i.e. the sites which are not specifically allocated for housing development but are still granted planning permission.

When challenged on appeal the local needs policy has invariably been supported by central government. When Stirling Council in their 1999 Draft Local Plan proposed to abandon it and allow the construction of 'open market' housing in Drymen and Croftamie there was strong community objection. The matter was argued over at a public inquiry and central government strongly supported the objection and the retention of the policy, which accordingly, is still the policy of the current local plans for both sides of Loch Lomond.

The Friends are very concerned that the National Park Authority, which is constitutionally bound by the **Sandford Principle**, is proposing such liberal Local Plan housing policies in the Loch Lomondside villages. The Sandford Principle is the title given to the part of Section 9 (6) of the National Parks (Scotland Act) which requires the Park Authority to 'give greater weight to the aim 1(a) "*to conserve and enhance the natural and cultural heritage of the area,*" rather than any other National Park aims.

We have **concerns** about the proposals to allow new affordable housing development outside settlements (*Policy HOUS 3, p26*) and existing building groupings in the countryside (*Policy HOUS*

4, p26) and wish to register our **objection** on the grounds that we consider local housing needs can, and should, be accommodated within existing communities to minimise the impact on the special landscape and scenic qualities of the Park and to reinforce the efforts being made to support the development of sustainable communities. We **agree** steps should be taken to avoid the need for car journeys to access services and facilities (*second part of Policy 3b*) and this **reinforces the case for meeting local housing needs within existing well established settlements** and not as part of existing building groupings in the countryside, with the exception of what is proposed under *Policy HOUS 5 (p28)* which we comment on further below.

The Loch Lomond & the Trossachs Draft Local Plan proposes to increase the number of affordable houses by an extent sufficiently large to have a detrimental effect on some of the villages and even on the countryside if the village is not large enough to accommodate the proposed increase. We contend the selection of certain villages such as Callander and Drymen to accommodate unjustifiably large allocations of affordable housing will not conform to the normal 'gradual organic growth' expectations of communities. Additionally the Draft Local Plan states the intended target for the number of affordable houses needed but does not give a reason for the figures. It refers to Housing Surveys but these do not contain figures for particular parts of the National Park and tend to embrace areas outwith the Park boundaries as well.

We **welcome** the qualifications on new houses in the countryside (*Policy HOUS 5, p28*) as this will prevent sporadic development. We are also pleased there is some recognition of the housing needs of established rural businesses and of a household that is retiring from working an established rural business, and where there is a long established link between the household and the wider rural area. There have been many instances in the past of individuals in these circumstances having to either leave the area or move to some of the larger towns and villages against their wishes.

6. Economic Development (Local Plan, s3.6, p30-33)

We **support** the proposals to safeguard existing economic and employment areas (*Policy E2*) and the other policies in this section, as they will contribute to helping to sustain communities within the Park. We are, however, surprised that further work is required to gain a better understanding of economic development within the Park. We suggest this issue is addressed as a priority by the Park Authority and its partners, to help ensure appropriate measures are introduced to support the long-term sustainability and vibrancy of local communities.

7. Sustainable Tourism and Recreation

We have no substantive comments on this section of the draft local plan and are generally **supportive** of the 3 tourism policies detailed as they build on the sub-destination frameworks developed in partnership with local communities and local businesses over several years. We believe if all the recommendations are implemented substantial progress will have been made in helping to enhance the overall quality of tourism and the visitor experience in the area. Our only concern is the lack of impetus recently in progressing the co-ordinated development, management and promotion of different parts of the Park due to factors such as the re-organisation of other agencies, personnel changes and changing priorities within the National Park Authority and local authorities, and the limited resources available to progress the 'public realm' works in particular.

We **support** *Policy REC1- Recreation Development* and the list of recreation opportunities detailed in Schedule 6 (p44 and 45) with some qualifications. We are pleased that some emphasis is placed on protecting lochs for quiet recreation in the supporting text under the last three headings in Schedule 6 and **recommend** similar text is introduced under the first heading in relation to water-based recreation on Loch Long. This would be consistent with the reference to encouraging non-motorised water recreation uses under the former torpedo factory range listing in the Arrochar/Sucloth section of the Plan (s5, p98). We continue to be opposed to some of the noisier water sports within the Park such as jet skiing, which is an ongoing source of conflict in the Loch Lomond area where most visitors are seeking a quiet 'nature' experience.

Similarly, we **support** *policy REC2-Enabling Recreation on Open Water* with some reservations as there is no specific safeguard built in to encourage and enable quiet non-motorised recreational opportunities and to prevent the introduction of noisier water sports such as jet skiing, which not only disturb other loch users, but also the many thousands of walkers attracted to the surrounding hills each year. We **recommend** an additional clause is introduced under Policy REC2 to cover this point, along with some additional wording in the supporting text.

We **welcome** the publication of *Supplementary Guidance on Advertisement Control* as this sets out clearly the arrangements for ensuring there is a rational and co-ordinated approach to advertisement control balancing the need to respect the special qualities of the Park with the need to ensure visitors can find businesses easily and safely while helping to ensure businesses continue to trade successfully. We **recommend** that some references are built into the guidance note on monitoring and highlighting that action will be taken as appropriate by an

Enforcement Officer to ensure signing standards are maintained and not breached. There are some instances of unsightly unauthorised and prominent 'temporary' signs and banners appearing at road junctions that detract from the special qualities of the area. We also **welcome** the publication of the *Sustainable Design Supplementary Guidance* documentation to support and encourage high design standards and designs solutions which respect the special character and 'sense of place' of different parts of the National Park. The inclusion of settlement case studies is **helpful** as is the detailed guidance on holiday park and chalet developments (s3.4.2, p89-92) as this has been a source of problems in the past due to issues such as poor siting and design of units.

8. Transport and Access (s3 8, p47-51)

We **support** the policies TRAN1-7 and the short list of transport infrastructure proposals in Schedule 7(p47-48), with some qualifications. The transport interchange proposals for the Old Station, Balloch should be part of a wider scheme to strengthen transport links between the centre of Balloch, the PS Maid of the Loch and Lomond Shores. There is scope for an innovative and appealing solution and the relevant agencies need to adopt a much bolder approach to resolving this if the visitor potential of the southern end of the Loch is to be fully realised with good interconnectivity. We **recommend** a stronger statement on the need for better transport linkages is included as simply building an interchange on its own will not be sufficient. The car parking proposals for Drymen also need to be bolder and more ambitious as the village has more potential to be an important transition point between car borne visitors and a public transport shuttle up the east side of Loch Lomond. A larger proportion of the Gartness Rd site should be allocated for car/coach parking. Placing 'all the eggs in one basket' at Balmaha has major shortcomings. A more integrated approach to the design and implementation of the A82 north of Tarbet must be required by Transport Scotland. We **recommend** this should be written into policy TRAN3 (p49) as there is currently no reference whatsoever to the need for an integrated design approach and there are already signs of a piecemeal approach emerging with different companies taking responsibility for different sections of the route which doesn't bode well for achieving a consistently high standard of unified design that this stretch of road, in an area of high landscape and scenic value, deserves. Some reference should also be made to ensuring any new road developments support and take account of the 'great journey' Parkway opportunities detailed in Schedule 5 (p40).

We **welcome** the increased emphasis on enhancing the infrastructure for water-based transport, as we believe there is great potential to enhance the boat trip experiences on several lochs. However, it is essential this is done in a controlled and managed way to safeguard the special qualities of the lochs.

We are fortunate in having several iconic heritage vessels operating in the area and the completion of the pier upgrades, linked with the recent SS Sir Walter Scott restoration work and the ongoing efforts to bring the PS Maid of the Loch back into full sailing use, increases the potential to re-introduce the historic three lochs sailing opportunities as well as re-introducing timetabled services around the piers of Loch Lomond. We **recommend** these possibilities feature more in policy TRAN2 (p48/49) and the supporting text as this could help the case for securing funding to support these important initiatives.

We support Policy TRAN7- *Encouraging Outdoor Access*, but are concerned about how 'light' this section of the draft Local Plan is, given the importance of outdoor access and the range of strategic development opportunities there are. We appreciate a National Park Core Paths Plan has recently been drawn up but it would have been useful if some of the more strategic access initiatives were featured in this section and we **recommend** this is actioned to provide a more balanced picture of transport and access development priorities and projects. We are keen to **secure a commitment** to an 'around the loch footpath' for Loch Lomond as there are currently some important gaps in the route, particularly at the south east corner of loch where some of the more spectacular views can be enjoyed. We also **recommend** the inclusion of references to other projects such as the 'Three Lochs Way' long distance footpath and the Killin-Crianlarich-Tyndrum cycleway/footpath in this section of the Plan as they are of strategic importance in opening up more access opportunities within the Park.

9. Environment (s4.1, p52-80)

We **endorse** the 31 policies in this section as they appear to cover all the environment protection and design quality issues in the Park very comprehensively. Although mentioned earlier it is worth reiterating the importance of the heritage vessels/ships in the Park and we **recommend** there would be merit in adding a specific policy on this topic on pages74-75 where there are no less than four policies dealing with land-based listed built structures/ designed landscapes. We also **recommend** that in the penultimate line of *Policy ENV20 Conservation Areas* (p73) the text should read 'Demolition **must** not begin' as there have been instances in the past when the necessary consents have not been in place before demolition works have commenced.

10. Renewable Energy (Local Plan, s4.2, p84-86 and Draft Supplementary Guidance on Renewable Energy)

We have highlighted some of our **concerns** about the inconsistencies in the documentation relating to renewable energy policies/statements on page 2 of this response, and in particular on wind energy developments. However, more worrying are the steps the Park Authority seem to have taken to 'pander' to the powerful wind energy lobby since the production of the previous draft Local Plan and this is evident from the comments in a report prepared by the Forward Planning Manager on the first round of Local Plan consultations which was considered at a special meeting of the National Park Authority on 14th December, 2009. In response to these representations a 'less rigid' approach to dealing with the different scales of renewable energy is now proposed which we believe has considerable dangers for the future protection of the Park and its special qualities. We **strongly object** to this more 'relaxed' approach and **recommend** that a more robust and stringent regime for controlling renewable energy projects, and wind energy projects in particular, be adopted.

We have carefully reviewed the section on renewable energy in the draft local Plan and the *Supplementary Planning Guidance on Renewable Energy* document prepared by Entec UK Ltd and MNV Consulting Ltd and are very concerned that all forms of renewable energy projects –hydro, biomass and wind-appear to be acceptable within the National Park which we **disagree** with on amenity and conservation grounds. We are strongly of the opinion that the ICUN protected landscape status of the Park and the statutory duty placed on the Park Authority 'to conserve and enhance the natural and cultural heritage of the area' should take precedence and application of the Sandford Principle should rule out consideration of large wind turbine structures. We therefore wish to **formally object** to Policy REN1-Wind Energy Renewable Projects (p84) as this places a presumption in favour of clusters of wind turbines (community wind farms) measuring around 50metres (162ft) and possibly up to 70 metres (227ft) consisting of 1 to 6 turbines in height if they pass the tests detailed in the policy. This is based on the information and case study in the Supplementary Guidance, which is slightly ambiguous and not as clear as it should be on a matter of such importance.

We are **pleased** in the Supplementary Guidance the consultants practically rule out larger scale wind turbines (above 70 metres/227ft- p3/p31) by stating the conflict with the special qualities is *likely* to mean that what would generally be considered to be commercial scale wind energy developments would be *unlikely* to be considered acceptable within the Park.' However, we would **recommend** this 'advice' should be more explicit (i.e. commercial scale wind energy developments **would**

not be considered acceptable within the Park) and incorporated within a clear policy statement in the Park Plan itself as opposed to being tucked away in the supplementary guidance document prepared by consultants. Similarly, greater clarity is needed on what number of 'community scale development and vertical axis machines' are likely to be acceptable as the text on p31 is at variance with the worked example on page38-39. We have **difficulty accepting** that there would be a situation within the National Park where a cluster of 'community wind farms' with up to 6 turbines measuring up to 50metres in height or more would be acceptable on amenity grounds. We also **strongly disagree** with the consultants' assessment of the areas identified as potentially suitable for developments of this nature (see map) which appears to cover about 70% of the land area of the National Park. We note in the key to the map that references are made to 'areas potentially feasible for wind energy development' and 'areas potentially suitable'. There is an important difference in meaning and we would question whether a proper planning assessment has been undertaken or whether they are merely indications of where there is sufficient wind speeds (sometimes) for wind energy developments to be viable. Clarification would be helpful, and if this is a planning assessment the Park Authority is happy to accept then we fear for the future of the Park and the protection of its special scenic and landscape qualities. The Park Authority surely cannot be serious about encouraging the siting of 50 metre plus wind turbine structures in the foregrounds of some of the most iconic and scenic views in Scotland! The impression is given that the policy and supporting documentation /mapping has been rushed through the Park Authority with very little or no consideration by members (we certainly hope this is the case) and we would **respectfully ask** that the map is withdrawn and Park Members give the subject of wind energy development much more detailed consideration before the final Local Plan is adopted. Our clear view is that there is **no place** for wind turbine structures of the scale envisaged within the National Park and we **recommend** the Park Authority adopts a similar policy position by reflecting this in the final adopted Local Plan.

There are already early indications of expressions of interest from commercial wind farm developers and some communities following the release of the draft Plan and accompanying map and we predict there will be major conflicts and disagreements in communities and conservation circles as residents and others weigh up the prospects of large annual community financial dividends (in effect bribes) with the long-term adverse visual impacts on local amenity and the special landscape qualities of the Park. It is time to be clear about this, for the Park Authority to show real leadership by declaring the National Park as a 'no go area' for wind farm development. This would be in line with the stance adopted by other National Parks throughout the UK and internationally.

We believe the National Park area can make a **positive contribution** to the Scottish Government's Renewable Action Plan by focusing more on hydro renewable projects and other less intrusive forms of renewable energy projects such as biomass, all more suited to a National Park setting. We therefore are **supportive** of *Policy REN2-Hydro Renewable Energy Projects and Policy REN3-Energy Generation from Biomass and Biogas*. We are pleased to note the list of environmental safeguards listed under Policy REN3 to ensure the impact of hydro schemes is minimised. We would also **urge caution** on the scale and number of hydro schemes permitted. We are pleased to note the consultants have concluded (p3, supplementary guidance) that new large-scale impoundment is considered unlikely to be compatible with the special qualities of the Park, and we recommend that this is **ruled out completely** in the policy framework in the draft Local Plan. We **support** the recommended approach of focusing more on small-scale run river schemes provided there are adequate safeguards for salmon runs and minimising the visual impact of the clutter of pipes, cabling, etc. associated with micro-hydro schemes. The impact on popular hill walking routes also needs to be taken carefully into account as the indicative catchment map shows around 200 water courses with potential sites for micro-hydro schemes and many of them are in popular walking areas.

Finally, we **strongly support** *Policy REN5 –Renewable Energy Development Adjacent to the National Park Boundary (p86)* and are pleased the Park Authority will object to renewable energy developments projects outwith the Park where they have an adverse impact on the landscape setting of the Park. This also reinforces the need for a more robust and consistent policy stance to be adopted within the Park as *Policy REN1 Wind Renewable Energy Projects (p84)* clearly states the Park Authority will support wind energy projects provided certain guidelines are met. There is inconsistency between objecting to wind energy developments outwith the Park, while allowing them within the Park. There is also an implication from the drafting of the policy (last two lines) that some large-scale schemes may be considered acceptable subject to a satisfactory environmental assessment being undertaken which is at odds with the advice prepared by consultants in the Supplementary Guidance. We therefore **recommend** *Policy REN* is re-drafted to take account of the **concerns** and **objections** we have raised and the inconsistencies mentioned above.

11. Mineral Extraction (Local Plan, s4.2, p87)

We are **supportive** of *Policy MIN 1-Proposals for Re-opening Old Mineral Sites and New mineral Extraction* where this would assist in replenishing the stock of traditional building materials in the Park, and in line with the conditions set out under this policy heading. Our reading of this policy is that if it were in force now the current application for gold extraction at Cononish would be in contravention of the policy guidelines. However, we are concerned in the reasoning for *Policy MIN1* there is a statement that the Park Authority 'recognises that (*the gold reserves*) are an exceptional resource' but no reference is made to the 'exceptional natural heritage resources' of the surrounding area which includes a designated Site of Special Scientific Interest and a Special Area of Conservation.

12. Telecommunications (Local Plan, s4.2, p88)

We **welcome** the inclusion of a number of safeguards under this policy heading to minimise the environmental and cumulative impacts of telecommunications development proposals.

Conclusion

This draws to a conclusion our comments on the draft Local Plan and we trust our comments will be taken fully into account in moving towards finalising the first Local Plan for the National Park. We believe the adoption of the revised final Local Plan provides the Park Authority with an excellent platform to take forward the vision for what is a very special place, in a constructive and co-ordinated manner with prospective developers, local communities, individuals and partner bodies such as the Friends. We look forward to continuing to working closely with the Park Authority in seeking to further our aims of conservation and encouraging the consistent implementation of good planning policies.