

## Response to Luss Estates Land Use and Development Plan Consultation

**1. Overall Approach-** The Luss Estates team under your leadership is to be commended for the comprehensive and integrated approach to consultation undertaken as part of developing the draft Land Use and Estate Plan. The integration with, and support for, the development and production of Local Place Plans led by Community Councils and the series of in depth workshops with various stakeholders has undoubtedly help enrich the contents of the draft Land Use and Development Plan and ensured it is more deeply grounded in reality and the 'art of the possible'. Taking a broader view of the needs of the local communities and featuring them in the draft plan is also welcome and should help wider ambitions to tackle the range of major issues facing Luss, Tarbet and Arrochar. The draft plan will also hopefully influence the contents of the final Park Partnership Plan which is due to be adopted later this year as well as the new Local Development Plan. With the plethora of plans there is a real danger of 'plan and consultation fatigue' and a lack of focus on delivery in specific areas and on specific themes. It is therefore very helpful having a comprehensive and practical plan for such an important part of the National Park which is well presented and easy for people to relate to.

**2. Striking a Balance-** We welcome the emphasis being placed on striking a balance in such a strategically important part of the National Park which suffers greatly from through traffic and visitor pressures and yet has stunning scenery and fragile communities where depopulation and availability of affordable housing are emerging more strongly as key issues alongside the need to contribute to the climate and nature recovery crises currently being articulated by the Scottish Government and the National Park in various policy documents. There is a real danger that the emerging climate and nature led policy framework could lead to stifling the growth and development of communities and landward areas with unintended consequences of contributing further to rural depopulation and stagnation. It therefore is very helpful that the draft Plan majors on the need to find a balance and the importance of sustaining life and prosperous communities across the Estate and the wider Park setting while responding responsibly and proportionately to the climate and nature crises.

**3. Context-** The draft plan provides a useful overview of the current changing context locally, regionally and nationally but what is particularly striking is the results of the local community fact finding exercise and the re-confirmation that the local population is ageing with local primary school rolls dwindling with a high proportion of the housing stock becoming available on the market being lost to second homes or holiday lets. Various current policy initiatives relating to reviews of second homes and the introduction of licensing for holiday lets on their own will be inadequate in addressing the underlying structural housing crisis and there is clearly a need for more affordable housing to be available in and around the villages tied to a stricter house occupation planning regime which used to be in place but was inexplicably relaxed a number of years ago by the Park Authority. The identification of some housing sites in the draft plan is therefore welcome and supported as the sites chosen seem to be sensible taking account of environmental sensitivities and they are at an appropriate scale involving renovations of existing properties, development of infill sites and the creation of a larger cluster of housing at Arnburn. Hopefully, they can be developed within the timescale of the updated plan along with those sites which featured in the last plan and secured planning consents.

**4.1 The Environment-** We are supportive of the proposed Glen Douglas and Glen Luss Hydro river hydro schemes and also the plans for a battery energy storage scheme. However, we do have concerns about the re-emergence of the wind farm site again wedged between Helensburgh and the boundary of the National Park albeit we acknowledge this would be subject to viability and community support. Just concerned that there is no reference to visual impact on the special scenic qualities of the Park and inclusion of this proposal detracts from the otherwise comprehensive package of low visual impact decarbonisation proposals. This would be the fifth in a series of current windfarm proposals on the periphery of the National Park potentially adding to visual clutter and a ring of steel around the National Park overlaid with several pylon strengthening schemes.

We strongly support the proposed new Luss Glens Access route and hope much of the infrastructure for this can be delivered through the SSE/SP View/Vista programme over the next 5 years.. We also welcome the proposals to support carbon sequestration and an increase of biodiversity across the Estate's landholding and in particular the two large scale nature regeneration schemes.

We support the proposals to attach visitor management rules as lease conditions with future tenancies as this has worked well on the waterfront in Luss and helps contribute to the wider visitor management efforts.

**4.2 Life in the Community-** We strongly support the idea of businesses who benefit from Loch Lomond putting back into the local community with the further development of the Friends of OUR park visitor giving scheme and the introduction of the proposed Community Fund. We would ask that you consider including a reference here to encouraging business to participate in the Friends of OUR park visitor giving scheme to assist with visitor management and projects that benefit visitors and residents. Hopefully your community fund scheme and the Friends of OUR park scheme can co-exist. It might also be worth making a reference to the Scottish Government's planned visitor levy (tourist tax) scheme and pushing for funds raised via local businesses being reinvested for the benefit of tourism locally as opposed to disappearing into some central local authority fund in the same way as currently happens with local authority car parking fees in both Arrochar and Luss. Under the draft levy scheme proposals it is being suggested any funds raised must be spent for the benefit of tourism infrastructure and services with an obligation to consult local tourism businesses and local communities. It will be interesting to see how this happens in reality but it could be a valuable source of income to assist with visitor management initiatives such as village warden schemes which Luss Estates currently invests heavily in.

At this time we are reluctant to support a ban on jet skis across the entire loch system as is being suggested in your draft Estate Plan However, there is a strong case to exclude jet skis from Luss Bay where there are large concentrations of people enjoying other forms of quiet recreation including swimming, paddle boarding and canoeing. There is a case for exclusion of jet skis in the bay on health and safety grounds. The current proposals as part of the NPA byelaws review doesn't go far enough in strengthening safety measures in Luss Bay but we are aware there are major legislative hurdles to overcome to push through a more radical solution due to the centuries old right of navigation. Introducing a wider ban on the loch and across all the lochs in the Park would require massive investment in policing and ranger resources at a time when there are more pressing needs to improve outdoor recreation and visitor infrastructure throughout the National Park.



We support the creation of a new village centre and other site improvements in Arrochar and Tarbet as part of a wider visioning exercise for both villages and the linking isthmus.

**4.3 Homes and Population-** We support the proposed allocations of land for new housing along with the change of use of the couple of sites to residential identified in the draft plan. We also support the retention of the current sites identified in the current Local Development Plan but are concerned at the lack of progress in delivering the new houses which have stalled for a considerable numbers of years. We appreciate the economics of delivering houses in the various locations identified previously are challenging due to high infrastructure costs and would encourage you to explore options for delivering a mix of housing which includes some affordable allocations which you are obliged to do in any case under current planning policy. The promotion of self-build and affordable or shared equity housing with primary residency planning conditions has our support. However, we consider there is a proactive role for housing associations to help address the 'hidden' housing waiting lists that emerged during the discussions at one of your stakeholder workshops which was attended by housing association representatives.

**4.4 Visitors-** We support the spirit of the aim of diverting visitors away from the Luss village to alternative activities but think that there needs to be an acceptance that the ability to divert significant numbers will be limited given the appeal of the historic village core and the pier/beach area. More investment is required in managing existing visitor flows and behaviours to ensure some of the aspirations and concerns articulated by local residents involved in the Luss Summit and the consultation on the local Place Plan are addressed on a collaborative basis. There is potential to draw this out more explicitly in this section of the plan where there are references to warden schemes, the Luss Summit and provision of new public toilets. Is there not a fuller menu of visitor management tools/measures that should be mentioned eg successful implementation and monitoring of the TRO in Luss and better and enhanced litter management arrangements in Luss and Arrochar?

The proposals for specific sites in and around Luss and at Aldochlay have our support in principle but it would be useful if you could share more information on the potential visitor attraction development with possible link to Beinn Dubh. Is this the potential cable car that has been previously suggested? The Fairie Farm and associated end point makes sense and we hope you are successful in securing retrospective planning approval for this welcome development which is already helping to take some visitors out of the core of the village. We strongly support safeguarding public loch access at Aldochlay with the introduction of new parking and associated facilities. The small scale visitor accommodation proposals are welcome as are the proposals for a new 50 pitch touring caravan and campervan site north of Luss. The touring caravan and campervan site would help relieve pressure in existing laybys along the busy A82 corridor and address some of the shortfall in provision which has occurred in the last few decades with more existing caravan and camp sites along the A82 and A83 corridors being converted into chalet and static caravan parks.

The focus on Arrochar and the isthmus link between Arrochar and Tarbet is welcome as we have been campaigning for action here for a number of years. There is no doubt your involvement in the area and the emerging ideas in the local Place Plan and your draft Estate Plan can be catalyst to not only develop the area as a longer stay visitor destination but also to assist much needed village regeneration activity. There are encouraging signs of movement within public sector bodies with the recent emergence of almost £3 million worth of visitor infrastructure schemes for two sites



in Tarbet and Arrochar but there is much more that requires to be done which falls into the remit of the private sector if the correct planning policy framework is in place and the proposals highlighted in the local Place Plan and draft Estate Plan feature in the next local Development Plan. However, there is a more pressing need to convert plans into action here as sites have remained derelict and undeveloped for several decades and there are many blighted sites in the area.

We are supportive of a commercial visitor development site to the south of the A83 and the eastern flank of the village as part of opening up the isthmus area and improving pedestrian and cycle links between the two villages. We also consider there is scope to introduce some countryside leisure activity into the area east of the railway line. This could form part of a linear park between the two villages creating a safe area for visitors and local residents to enjoy with a landscaped buffer being created next to the busy A83. The proposal to move the railway station to the south of the bridge took us a little by surprise but there is merit in presenting a case for this major investment to improve accessibility and to integrate the scheme with other development opportunities for tourism, public recreation and service facilities. In the recent past there have been some suggestions part of the area to the east of the railway and south of the A83 could be developed for a lorry pull in and rest area and we think this merits further investigation and a mention in the draft plan. It could also be a good location for a public transport hub with interchange facilities for service buses and longer haul bus services. We agree the Tarbet sites in other ownerships should be developed for tourism and other purposes as part of a masterplan for the area. Mouldsdale Properties own considerable areas of blighted land in the area and it would be good to see some progress with developing some of these sites now that the National Park is about to invest £1.5 million in the Tarbet Bay site. They should not be blighted indefinitely due to the uncertainty surrounding the potential upgrade of the A82 and possible reinvestigation of route options following the recent success of the HADAT and Friends submissions to the Parliamentary Petitions Committee led by John Urquhart. The redevelopment of the Torpedo Station site for a mixed leisure and housing development has our support in principle. It would be useful if in this section the scope to turn vacant properties in the centre of the village for tourism and other purposes was mentioned too.

**4.5 Jobs & Business-** There is some overlap here with the section on visitors which features tourist developments but we agree this section is relevant to capture other developments as there is a danger of the area continuing to become over dependent on tourism as an employment generator which is characterised by low pay and seasonality issues. A more balanced economy is desirable with a broader mix of employment opportunities within the local area. We are impressed with what Blair Atholl Estates has achieved with the diversification of business opportunities on their Estate and the creation of a mini business park at the north end of Blair Athol. Is there not scope to do something similar on one of the sites which forms part of Luss Estates or is the proximity of Helensburgh and the Vale of Leven a potential barrier to this happening with the availability of small industrial units there? Perhaps worth a fuller investigation and drawing on the Blair Atholl purpose built units development as a case study. Most of the tourism and access development proposals listed here are mentioned elsewhere also and we have already commented positively on them. We accept the future use of the Luss Rescue Boat building will require careful consideration but consider any recreational uses require to be restricted to ensure quiet recreation is promoted as opposed to motorised and high speed boat operations which would be outwith the spirit of trying to ensure there is more balanced control of uses in the wider Luss Bay area where there are health and safety and noise issues. Introducing more motorised vessels here would be at odds with the proposals to try and secure a jet ski ban in the Bay.





**4.6 Getting About-** We strongly support and welcome the comprehensive set of proposals in this section and particularly welcome the plans for a new safe walking route between Arrochar and Tarbet and the creation of the new Luss Glens new walking and cycling route which we have commented on earlier. Support for the Tarbet corner realignment and the A82 high road realignment are both welcome as is the emphasis on promoting the introduction of boat passenger services at Arrochar. It would be helpful if in this section you could mention support for pier improvements at both Luss and Tarbet which have a vital role to play in allowing visitors to access Loch Lomond. There is a mention of pier improvement schemes in the draft Partnership Plan and it would be useful if the draft Estates Plan could also reinforce the importance of progressing improvement schemes including the provision of a covered area for shelter at the currently exposed Tarbet Pier site.

**5. Visions.** We support the 'joined up' visions for Luss & Arden as well as Arrochar & Tarbet which tie in well with the new local Place Plans and pull together the thematic proposals in earlier sections of the draft Land Use and Development Plan which we have already upon. The three strands listed for taking forward the Luss & Arden proposals are presented as three different stages when in fact they are all integral to one another. We are not sure if 'stages' is the right term to use as it implies one follows on from the other when they are likely to require simultaneous attention and efforts to make things happen. This implementation section of the plan could be articulated more clearly here and/or in the 'Next Steps' section which are both fairly light given the time and effort made in pulling the plan together. Mention could be made of creating action groups and/or using existing groups to help take actions forward as the final adopted Plan cannot be delivered by Luss Estates in isolation. This was recognised at the plan formulation stage but does not feature as strongly in the implementation section of the plan which is currently quite weak. Some actions will require Luss Estates to take the lead but others, including local communities, will have to take the lead with support from public agencies. The previous ideas of funding Development Manager/s Project Officers requires further consideration to help make things happen and posts could be funded by a combination of Hydro Funds, the new Community Fund and other sources. Should this not feature in the implementation section of the Plan?

We wish you well with taking the draft Plan through the next stage to final adoption and we sincerely hope the proposals feature in National Park policy plans and documents where relevant so that they can be adopted and implemented as part of achieving the overall aim of sustaining life and prosperous communities across the Estate while responding responsibly and proportionately to the climate and nature crises. The area covered by the Estate is a critically important part of the National Park and the collaborative efforts of the Luss Estates, local communities and other partners can make a very positive contribution to delivering current and future National Park aims.

James Fraser

Chair  
Friends of Loch Lomond and The Trossachs

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