

From: andy mcclay [REDACTED]
Sent: 04 December 2018 09:09
To: Craig Jardine
Subject: "Luss" Planning Applications- Objection.

Sir,

This letter of objection is in regard to all the planning applications at Aldochlay 2016/0393/DET, Arnburn 2016/0389/DET, Hawthorn 2016/0391/DET, Muirlands 2016/0390/DET 2016/0392/DET 2016/0394/DET, Porte O' Rossdhu 2016/0387/DET 2016/0387/DET .

Whilst eight applications have been submitted in reality these are being determined as an overarching application under the local plan and the supplementary guidance of the West Loch Lomondside Rural Development Framework, for ease of reference- RDF.

I believe the core principle and objective of this "trial" approach is to promote population growth by way of "in-migration" through the provision of affordable housing within the RDF area. To achieve this goal a wider approach to planning is required in the countryside. This view seems to be supported by Luss Estates who have confirmed within the supporting statement dated 22 November 2018 that "..one of its fundamental aims, being that of encouraging the introduction of family-orientated housing...".

To be clear I have no issues with the broad aims and objectives of the RDF. I do however have concerns on how these aims and objectives are delivered and safeguarded.

Residential consents granted under this "trial" approach must be protected. All houses must be restricted for use as primary/principal places of residence. The properties cannot be land banked, used as second homes, holiday homes nor holiday rentals problems which the RDF highlights as barriers presently preventing in-migration of families.

Additional protection and safeguards are essential to protect the fundamental aim of encouraging the introduction of affordable family-orientated housing. It is fair to say that open market housing is required to help fund affordable and social housing. Under this proposal the open market housing could easily be sold off relatively quickly with no guarantees that the affordable element, the very core and reason for the RDF guidelines, will in reality be delivered. This must be resolved and controlled.

Turning to the Hay Partnership statement under the heading "Link Housing Group development in Luss", paragraph four of their letter of 22 November 2018. This seems to be suggesting that the marketing of any of the affordable sites secures the planning consents, if granted. Marketing does not constitute commencement of development. Surely this is completely at odds with planning law and the aims of the RDF. As far as I am aware planning consents are valid for three years and construction work must be started on sites within that time period in order to secure them. Standard time frames for proper works to commence on all consented application sites must be applied individually to encourage development rather than encouraging land banking.

The 50/50 open market/affordable housing ratio should be maintained at this early stage in the process. The applicant is suggesting that this be reduced to 45/55 in this case. The next applicant using the RDF as a guide for future applications could easily request that this ratio be reduced further which defeats the purpose. A clear line should be drawn and maintained.

The developed site to the north of the Loch Lomond Arms Hotel is referred to under the affordable housing appendix of the applicants supporting statement. This comprises five units. The cost of developing the site should have been agreed at the time in order to bring the development forward. It is for the landowner and housing Association to agree whether the land was worth £1 or minus £79,999 and this is commercial decision they both have to make. An additional credit of three units is really double counting and the credit should equate to what was delivered-five.

The village green site is referred to under the public realm works appendix of the supporting statement. This site does not form part of the overarching planning

application. Whilst the proposal might be welcome, in reality it does not contribute, affect nor facilitate the delivery of the housing envisaged by the overarching application. Only public realm works which are necessary for the delivery of affordable housing should be granted a credit against affordable housing.

Whilst the RDF may have received general support for its aims and objectives I believe there has been insufficient consideration given to how these aims and objectives can in fact be delivered. Appropriate safeguarding procedures for the communities directly affected and guarantees of delivery of each and every aspect within the overarching application, not just cherry picking, must surely be in place prior to these applications being considered.

In light of the above I would ask that all of these applications be refused.

A separate letter of objection specific to the proposal at Arnburn will be lodged in due course.

Sincerely

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