

Mr Paul Paterson
2 Manor Way
Tighnabruaich
Argyll
PA21 2BF

Lynsey Innis
David Logan
Head of Legal and Regulatory Support
Legal and Regulatory Support
Kilmory,
Lochgilphead,
Argyll,
PA31 8RT

Local Review Body,
Committee Services,
Argyll and Bute Council,
Kilmory,
Lochgilphead, PA31 8RT

Friday, 23rd February 2024.

Dear Lynsey Innis & David Logan,

LOCAL REVIEW BODY REFERENCE: 24/0003/LRB
PLANNING APPLICATION REFERENCE: 22/00221/PP
ANDREWS GARAGE, TIGHNABRUAICH, PA21 2DS

Find herewith the following representation as requested and before no later than 8th March 2024.

The following representation from me, Paul Paterson of 2 Manor Way, Tighnabruaich, PA21 2BF is as follows:

LOCAL REVIEW BODY REFERENCE: 24/0003/LRB

PLANNING APPLICATION REFERENCE: 22/00221/PP

ANDREWS GARAGE, TIGHNABRUAICH, PA21 2DS

Having taken note of the email sent to me on Friday, 23rd February 2024 whereby this email with attachments and in reference to the above Local Review Body regarding a planning application within the locus of Tighnabruaich, Argyll & Bute. I hereby submit to you the following observations in relation to certain areas of those attachments.

Within the main body of the attachments are pages that have no bearing on me and mainly sits between that of the applicant and the local authority. However, the main thrust within that large body of material sits both rhetoric, hyperbole and vexatious wording. The applicant is giving a very inarticulate declamatory which lacks any merit, it is she, said, he said speech with vitriolic undertones, lacking any merits within law, there is no case law within that body of material from the applicant and as such is seen as frivolous in nature.

There are several areas within the body of the 43 pages of material that do however mention me, and I shall now address those parts in turn.

Page 13:

“The local review body should be aware that there are some malign forces at work although how far their influence extends (sic) we do don't know” (sic)

The applicants then go on a diatribe of rhetorical distaste about two objectors, one of whom is me. There were a large number of objectors some of whom have had personal threats made against them by the applicants, some of which resulted with the applicant sending in de-facto misinformation about those objectors' residence and place of work.

The sentence from the applicant is fantasy, it is without substance and fact and is more conspiracy theory laden grandiloquence hyperbole. When someone goes off at a tangent and tries to use a fantasy based ideal then it speaks volumes as to the nature and intent to the body of that material that has been supplied by that person/applicant.

Page 13:

Where the applicant has made a number of paragraphs in relation to me it is seen that such material is extremely vexatious in nature, highly false and is in breach of the Defamation and Malicious Publication (Scotland) Act 2021. The applicant has made defamatory comments which lack merit, substance and truth, it is both fantasy and conspiracy-based nonsense.

My employment status has no bearing on this planning application review nor is it of anyone's business. The applicant has made extremely false allegations which merit further legal comment, which shall be addressed personally in due form and time. I am a bona fida and legitimate member of the press; see images attached herein. You will also take note of the images of press tear sheets spanning from now and since 2008. I have a vast number of journalistic friends, newspapers, agencies and national media bodies and my union who can vouch for my experience, work and ethics. The applicants' comments about "journalist friends have never heard of him" is fictitious and erroneous rhetoric.

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Name: Mr Paul Paterson

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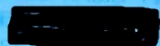


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**PAUL
PATERSON
PHOTOGRAPHER**

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Pass No 14
Mr. [redacted]





The applicant brings up another planning application which was also made by the same applicant, which was also refused, within the comments on page 13, the applicant has erred by including another planning application within this review of which the application was also refused.

My comments and objections relating to that other planning application was made in truth faith, without bias and had attributed from both personally seeing something that was not correct and was photographed and included within my objections at the time as well as obtaining various narratives from factual sources.

The usual process for making comments regarding planning reads something like this:

“Making a comment on a planning application.

Members of the public may submit a representation of support or objection to a proposed development right up until a decision is made on the application.

If you comment on a planning application, your comment, name and postal address will be published online for people to read. Your email address will not be published.

Any remarks or information that can be considered as falling within the description detailed below will be removed:

Defamatory, malicious, or libellous remarks about Planning staff, individuals or companies.

Swear words, incorrect information about others, innuendos about others, lies or unsustained truths about the application, defamation of character statements and offensive material of a religious, sexual or political nature.”

In such cases the local authorities who administrate such planning portals would take the appropriate action to weed out any such erroneous comments or remarks, as such Argyll & Bute Council should have removed any and all defamatory, malicious, or libellous remarks about planning staff, individuals or companies including that regarding about objectors. Personal comments about anyone are not acceptable especially those without foundation and are just mere hearsay.

The planning application process relies on people acting in good faith. There is an expectation that applicants and those representing them provide decision makers with true and accurate information upon which to base their decisions. However, under Town and Country Planning (Scotland) Act 1997, it is an offence to issue false representations knowingly or recklessly.

Page 43; No. 17:

The letter sent to Mr Gove from the applicant in relation to me is extremely vexatious and legally holds no water, it is highly defamatory as well as being full of hearsay and conspiracy theories.

There is a notion within the narrative from the applicant the there are misgivings about me, I have never hidden behind bushes, nor have I ever been aquatinted with anyone personally telling me off or otherwise, the applicant is behaving in a rhetoric manner, along with hyperbole and vexatious wording. The applicant is giving a very inarticulateness declamatory narrative which lacks any merit and lacks foundation. There is also a tone of threatening behaviour from the applicant, this in turn is legally fraught and leaves the applicant wide open. It should also be noted that there is an email chain of events from myself to the various heads of Argyll & Bute Council

regarding the applicant and threats made against me during my said objection to their planning application 22/00223/PP. See Complaint - 200611-000237. This was when the applicant and members of their family made frivolous and vexatious unfounded claims that I was interfering with planning application 22/00223/PP and using my position at the time as vice-chair of Kilfinan Community Council (I no longer act as a member of the KCC due to having to the threats made by two persons one of which was the applicant and due to personal safety and for the decorum of everyone within the KCC and as such the KCC disbanded due to insufficient members) which was rebuffed and warranted actions from myself to make a harassment claim against them to Police Scotland via the 101 service and that Police Scotland said it was dealt with.

Ergo:

The review and its contents from the applicant are highly inflammatory vexatious rhetoric that lacks any viable truth and merit. Furthermore, when an applicant makes serious remarks about objectors and how the applicant has wasted monies on the planning application and then goes onto blame the local authority for failures, there can only be one method in dealing with this and that is to strike out the applicants review and either ask for resubmission without the defamatory vexatious remarks and blame game, or to strike out in full. This review is all about sour grapes from the applicant and having to spend monies on applications and has attached an extreme amount of vitriol with it.

Paul Paterson

Freelance Press Photojournalist and Photographer

End...