

Appendix B – Relative to Application Number: 18/02596/PP

Area Capacity Evaluation

A. Purpose and Requirement for the ACE

In the Argyll and Bute Local Development Plan (2015), Policy LDP DM1 states that encouragement will be given to sustainable small-scale forms of development on appropriate infill, rounding-off and redevelopment sites within the Countryside Zone. Policy SG LDP TOUR 1 of the LDP states a presumption in favour of new or improved tourist facilities and accommodation provided development is of a form and scale consistent with policy LDP DM1 and that they respect the landscape character and amenity of the area.

The application site lies within the Countryside Zone as defined within the adopted LDP maps. Policy LDP DM1 and Supplementary Guidance policy SG LDP ACE 1 of the LDP identifies those circumstances where an Area Capacity Evaluation (ACE) will be required to accompany the assessment of a planning application. In such situations where there is a proposal seeking support with a clear exceptional case, these require to be the subject of an ACE.

The proposed development of 40 new caravan stances proposal is classified as ‘medium-scale’ tourist development within the Countryside Zone which will require an Area Capacity Evaluation to be carried out to justify the proposed development within the larger holiday park site, and wider area.

The purpose of the ACE is to establish the capacity of the wider countryside containing the application site to successfully absorb the scale of development proposed, in response to a locational need or other exceptional circumstances. It, therefore, involves an assessment of landscape sensitivity to the type and scale of development being proposed. The outcome of the ACE assessment will be a material consideration in decision-making.

The approach to the ACE process is based on current best practice guidance for a systematic approach to landscape and visual impact assessment developed by the Landscape Institute and the Institute of Environmental Management and Assessment with support from SNH.

B. Area of Common Landscape Character / ACE Compartment

The application site and its immediate surroundings form part of a ‘*steep ridgeland and mountains*’ landscape character type (LCT) as defined in the SNH Landscape Character Assessment Argyll and the Clyde 1996. However, the SNH document also defines broader Landscape Character Areas and the site is identified as within ‘*Cowal Ridges*’. This broader area is considered to be of greater relevance in relation to the current application. The key issues affecting the ‘*Cowal Ridges*’ insofar as they relate to tourism developments are noted as follows:

- The development of larger caravan parks, particularly in sensitive loch-head locations
- Pressures from tourism related vehicular traffic; and
- Built development associated with towns on narrow scenic coastlines.

Specific Landscape Guidelines advise conserving and extending all broadleaved woodland; reinforcing the distinctive and varied woodland character of burns and lower slopes; and giving priority to the continued protection and management of semi-natural woodland. It also advises to plant trees to help screen and integrate existing built development particularly where it forms a continuous line at the foot of steep slopes. New built development should always be set within a framework of woodland designed to integrate the settlement with the wider landscape.

The ACE landscape compartment that has been identified is essentially the entire Holiday Village complex, which lies on the eastern side of the Cowal Peninsula by the Firth of Clyde. It is set within an area of mature wood and parkland, being part of the former grounds and policies of Hafton House. The complex is situated on land which rises gently southwards and westwards from the shore of Holy Loch and the settlement of Hunter’s Quay to the north and west. The grounds and policies of the

Holiday Village are actively managed and maintained to a high standard, commensurate with the site's status as a principal tourist and leisure destination for the area. The woodland cover of Camas Rainich Wood to the south and east, Kennel Wood, Lochan Wood and Target Wood to the west and south on higher ground, together with individual specimens and mature tree cover within the Holiday Village itself, generally serve to reduce its apparent scale and to visually integrate it into the wider landscape.

C. Key Environmental Features/Constraints

The Key Environmental Features of the ACE Compartment (i.e. Hunters Quay Holiday Village) are as follows:

- The site rises from the Holy Loch southwards towards higher and elevated wooded areas mainly along the eastern escarpment, central knoll and southern plateau. The mature woodland comprises primarily Scots Pine, Birch, Oak, Beech and Larch. The woodland structure provides a high amenity for visitors and walkers while making a significant contribution to the immediate and wider landscape with dense area of woodland primarily along the eastern and southern portions of the site. Camas Rainich woodland is classified as Long Established of Plantation Origin and a Tree Preservation Order (TPO 8/91) covers the majority of the application site and the adjacent Kennel Woods on the western boundary.

Comment – The Tree Preservation Order largely constrains future development as the majority of the remaining unbuilt parts of the holiday park are regarded as key environmental and landscape features.

- The approach to the Holiday Village from the north east is very undeveloped in nature and characterised by open grass with isolated mature trees. The internal access road curves and rises through this parkland setting up towards the accommodation and leisure facilities.

Comment – the frontage of the holiday park presents an open parkland setting to the Holy Loch. This front area is highly visible from the A815 and communities on the north side of the Holy Loch. Any development on this area would be highly visible from wider viewpoints.

- The built areas comprise a timber chalet site in the north-western side of the park with two areas of caravans to the east (Iona and Burnside Villages) and to the south-west, the Town Village. In the centre of the park is Jura Village with Tiree Village to the south wrapped around the wooded knoll. Islay Village is situated to the north east of the main leisure and office building. Recent permissions in 2007 allowed further expansion in the south-west corner of the park with the creation of two new villages (Gigha and Colonsay) and within a former quarry area (Bute). The former office building at the lower part of the main entrance to the site is now used as staff offices and stores and caravans have been sited in this area as an extension to Islay Village. Within the chalet park, several caravans have been recently sited amongst the timber lodges.

Comment – the holiday park has evolved with varying clusters of caravan (and chalet) development with clearly identified 'villages'. These 'villages' have individual character which is reinforced by blocks of woodland acting as natural buffers of open space which create separation and identity. There are no obvious undeveloped spaces that would not involve encroaching into adjacent caravan villages.

D. Opportunities

The application site is 3.8Ha in area, consisting of a long narrow strip of land extending approximately 500m southwards along the western edge of an existing wide access and approximately 90m wide at its broadest point.

The site currently comprises stands and individuals of mixed mature trees, a large proportion of which are plantation Scots Pine, with significant open areas within the central and western portions. Peat

and its associated vegetation is evident following the recent clearance of *Rhododendron ponticum* throughout the area (in the autumn of 2016, undertaken as part of an established Woodland Management Plan).

To the south of the application site is a buffer of mature trees and woodland screening the Cowal Golf Course. To the west, the site is flanked by a dense stand of plantation pine, part of a broader area of mixed woodland approximately 150m wide, separating it from the adjacent Tíree Caravan Village. To the east, there is a further area of mature woodland occupying a ridge of slightly higher ground which screens the application site from residential properties on the lower slopes in Hunter's Quay, on Cammesreinach Crescent and Victoria Road some 110-130m to the east. Residential properties further north on Eccles Road are some 200m distant.

The application site itself varies in elevation from 39m AOD to 54m AOD. Along its length, the site generally falls from east to west from the forestry road on the higher ground. The site is nominally divided by an existing drainage ditch and watercourse with the area to the west generally being flatter. The ground is boggy and uneven with poor drainage, underlying peat and associated flora. The principal feature of the compartment is of clearings within existing mature mixed woodland with reinstated ground cover due to recent clearance of *Rhododendron ponticum*.

The application site identifies an opportunity to sensitively develop an existing degraded part of the Cams Rainich Woodland, The site lies within a hollow which is screened by surrounding mixed tree cover and topography. The site is not readily visible from outwith the ACE compartment.

The proposed scheme also includes substantial new planting of native woodland to fill gaps and reinforce the caravan layout proposed. Combined with the applicant's on-going commitment to the positive management of the woodland resource across the whole estate, these proposals will help to ensure the long-term succession of the woodland resource, as well as improving age structure and species diversity.

E. Landscape Character Assessment

In this instance, the proposed development relates to an existing, long-established tourist destination which is already well integrated within the wider landscape. The proposed expansion would represent a circa 5% increase in overall capacity in terms of unit numbers for the Holiday Village. This will be dispersed within existing cleared areas of woodland and in small groups, in contrast to the older style massed ranks of caravans that the original guidance was most concerned with. It is therefore considered that the scale and nature of the proposal would respect and not exacerbate the key issues identified.

Furthermore, the proposal responds to the generic guidelines provided for 'Built Development', in particular with regard to; consideration to fitting development into the existing landscape, limiting disturbance of landform, retention of trees and planting native species, scale of buildings and consideration of the impact of light reflective materials and surfaces. In relation to 'Tourism Development', the current proposal, through its nature and design, complies with the guidance to ensure caravan parks are kept in scale with their surroundings and use mass planting to provide partial screens.

In relation to the specific Landscape Character Type guidelines outlined, these are less directly relevant being very broad scale however, the proposals fit with general guidance in terms of conserving broadleaf woodland, planting of native trees and in particular avoiding prominent or visually exposed locations. In the latter regard, the location of the site within the body of a much broader expanse of woodland and the retention of significant tree cover means that the tree-line horizon will remain unbroken. More recent landscape assessment and capacity studies undertaken for Argyll and Bute Council in 2010 by Gillespies are primarily concerned with capacity for windfarm and other shoreline development, identifying areas of panoramic quality. These studies do not cover Dunoon or the shoreline around the Clyde or the Holy Loch, being more concerned with remoter and wilder locations.

The Landscape/Seascape Assessment of the Firth of Clyde (published by Marine Scotland in 2013) covers the shoreline of Dunoon as part of the Inner Firth of Clyde. In terms of the experience of the landscape from the sea, the study highlights the importance of the wooded hills and slopes behind the town and their high visibility in wider views. The submitted visual assessment accompanying the planning application demonstrates that the proposed development will have no visual impact from the Holy Loch or Firth of Clyde. It is therefore considered that due to the limited extent of the development site, and the nature of the proposed development itself, there will be no impact on the wider landscape and seascape character.

F. Landscape Capacity

Argyll and Bute Council's Supplementary Planning Guidance outlines a methodology for the Local Authority to undertake an Area Capacity Evaluation (ACE). This method broadly follows current practice for Landscape Character Assessment and Landscape Capacity Assessment. It relies upon an assessment of the current landscape resource in terms of physical features, aspects of experience of the landscape and inter-visibility, to establish a baseline. This is followed by an assessment of the likely degree of physical change and visual intrusion of a development in the wider landscape to assess the capacity of the landscape, to accommodate the proposed development. Whilst this is not a formal Landscape Capacity Study, the process of undertaking a Landscape and Visual Impact Assessment (LVIA) is similar, particularly with regard to establishing a baseline for the existing landscape and making judgements regarding the nature and magnitude of impact on the landscape resource and visual intrusion of the proposed development. It follows therefore that reasonable conclusions can begin to be drawn from an LVIA regarding the capacity of the landscape to accommodate the proposed development.

In this instance, the LVIA undertaken suggests that the site itself has the capacity to accommodate the proposed development in the context of physical and visual impact on and around the immediate locale. This is where the change to the current baseline situation will be most apparent to the majority of receptors. The proposed design and its implementation is considered to have a moderate landscape and visual impact in the short-term, with that impact becoming low and beneficial over time, as the various mitigation measures in terms of new planting and vegetation take effect. Of significance in this instance, is the retention of over 89% of the existing tree cover within which the development is set, limited and controlled groundworks and a dispersed layout pattern.

In the context of the wider landscape, the LVIA demonstrates that the development proposal will have a negligible landscape and visual impact. In this context, and by extension, the wider landscape resource clearly has the capacity to accommodate the proposed development with little or no effect to the current baseline condition. Significant additional tree planting (400 new mixed species proposed) will augment the existing degraded woodland compartment further with positive visual impact both from within the development site area and from wider parts of the park, but negligible from wider viewpoints.

G. Additional Landscape Factors

Consideration has been given to seasonal differences in effect arising from the degree of screening for tree cover and/or the filtering of views that will apply in summer and winter. The presence of a large body of Pine on site, retained and integrated into the development footprint is a significant factor here. The assessment has considered this and seasonal variations in coming to the conclusions noted.

At night, the existing Holiday Village roads are illuminated, and this will be visible albeit, this has to be set into the context and proximity of the settlement of Hunter's Quay and streetlighting along the shoreline settlement in general. The proposed development site will also be lit for safety reasons however, the proposed lighting will be in the form of low-level bollards, capped to reduce light spillage. Given this, the location and orientation of the site and the proximity of intervening deciduous and evergreen tree cover, it is considered that the sensitivity of the wider landscape in this context is low and the magnitude of change likely to be perceived at night is negligible. The impact of any additional lighting within the wider landscape context is therefore considered to be negligible.

As is demonstrably the case in general, the impact of the night time lighting will be experienced most in close proximity to the development site. Here the magnitude of change will be greater, but the impact will primarily be experienced by Holiday Village users and visitors. Impact of the proposed low-level lighting will be mitigated by the natural landform of the site, the retention of existing tree cover and in the longer term, by new tree planting, which will help to further contain and filter light spillage into the wider landscape.

In general, any adverse visual impact of the new development will be greater during the short-term construction period however, this will also be experienced from close proximity viewpoints described above and will be temporary, being mitigated by new planting and re-vegetation combining with the retained tree cover.

H. Conclusion

The proposed development broadly follows the original design concept of discreet caravan villages or clusters separated by distinctive blocks of native woodland. The application site comprises currently degraded woodland which does not contribute positively to the immediate surrounding landscape. The development compartment cannot however be viewed readily from outwith the holiday park site and its location with a partially hidden glade represents an opportunity to improve the woodland compartment with retention and significant additional tree planting.

Taking into consideration all of the points described above, it can be seen that the significance of any impact by the proposed development on the existing wider landscape is negligible, with impacts being focused on and around the immediate development site itself. Here, the sensitivity of the landscape resource is considered to be medium in relation to the nature and type of the proposed development, as it seeks to utilise the existing landscape and its key features as a major element of the overall proposal. The desire to work with and enhance the existing landscape resource, and to sensitively integrate the new caravan units and their proposed infrastructure within an existing degraded woodland glade is reflected in the overall design proposals, and the consultation process undertaken to date with the Council to refine the detailed layout and unit siting. In addition, the various supporting surveys and studies have provided factual information on the landscape resource which has been used to inform the design and direct the proposed construction methodology, particularly in relation to minimising peat disturbance, the removal of existing trees and ensuring reinstatement of vegetation.

With the dispersed layout of the proposed development; the retention and protection of over 89% of the tree cover on site (including a significant proportion of evergreen trees), the use of muted tones, colours and non-reflective surfaces for the proposed caravan units; the proposed methodology for minimising disturbance to existing peat and protected species; and the proposed new planting (a total of 400 new mixed species trees to be planted) and habitat creation, the impact on the immediate site and landscape resource is considered to be moderate in the initial instance, becoming minor over time. Within the wider landscape context, the impact is considered to be negligible.

Visual impact will largely be limited to receptors in close proximity to the development site, using the existing forestry/woodland access road and viewing the existing caravan show area adjacent to the Leisure/Reception Centre. The sensitivity of the majority of these receptors is considered to be low and the significance of the change in visual effect is medium in the short-term and minor over time, as new planting takes effect.

Consideration of distant views has demonstrated that the development site is unlikely to be visible and therefore any change to the wider landscape scene perceived by a variety of receptors in the surrounding landscape will be negligible. In terms of the overall context of the site and the prevailing landscape character, the receiving landscape has the capacity to accommodate the proposed development, which is therefore considered to be appropriate in nature and scale