



**Development and Infrastructure Services**  
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**Ask For:** Peter Bain  
**Our Ref:** 21/00018/PP  
**Your Ref:** 22/0003/LRB  
**Date:** 27<sup>th</sup> July 2022

Dear Sir,

**TOWN AND COUNTRY PLANNING (SCOTLAND) ACT 1997 AS AMENDED**  
**LOCAL REVIEW BODY REFERENCE: 22/0003/LRB**  
**PLANNING APPLICATION REFERENCE: 21/00018/PP**  
**PROPOSAL: ERECTION OF A STEEL BUILDING FOR THE STORAGE OF AIRCRAFT**  
**MAINTENANCE EQUIPMENT AND AIRCRAFT AND FORMATION OF HARDSTANDING**  
**AREA**  
**SITE ADDRESS: GLENFORSA AIRFIELD, GLENFORSA, ISLE OF MULL, PA72 6JN**

I refer to the request for further written information issued by the Argyll and Bute Local Review Body dated 4<sup>th</sup> July 2022 in respect of the above; I am now in a position to respond as follows.

**Information Requested:**

To request the Planning Officer to submit in writing their assessment of the exceptional case information submitted by the Applicant as part of this Review and to extend the time for receipt of this information to 31 July 2022.

**Officer Response:**

Officers have previously advised of their concerns in relation to the acceptance of new information by the LRB having regards to S.43B(1) of the Act, particularly as the applicant had declined to provide the requested information during the consideration of the original application. It is however recognised and accepted that it is for the LRB as the decision maker to reach a view on whether the subsequent submission of this information amounts to a 'new matter' in their determination of the Local Review.

**General Operational Requirement:**

The further information submitted identifies an operational requirement for the provision of covered storage of a tractor and other small machinery including a grass mower, telehandler, small mowers, a roller, a harrow and a mini digger that are claimed to be essential to the continued maintenance and operation of the airfield; it is claimed that no such storage facility currently exists at the airfield. It is also claimed that the proposed hanger would provide year round covered storage for the applicant's own vintage biplane in addition to being an enhancement of the current airfield facilities for any planes stranded at the airfield during periods of severe weather.

Whilst it is accepted that the provision of a building to accommodate equipment essential to the operation of the airfield would amount to an operational requirement it is highlighted that the submitted statement does not clarify what the existing storage arrangements for housing

of essential airfield maintenance machinery/equipment are (it is assumed that some storage arrangements must be in place for existing equipment utilised at the site), nor does it provide any explanation as to why any existing arrangements are no longer available and/or considered to be suitable for the continued operation of the airfield.

The provision of a year round storage facility for the applicant's personal plane whilst desirable to the applicant, does not appear to be a matter that is in itself essential for the continued operation of the airfield although it is recognised that delivery of this personal objective would also deliver an enhancement of existing facilities for the wider users of the airfield, particularly during periods of adverse weather.

#### **Economic Benefit:**

The statement outlines that the airfield provides economic benefits through facilitating access to the Isle of Mull by general fliers including day trippers and persons visiting the island for a longer stay with use including planes, micro-lights and helicopters. The statement also highlights that organised events also attract additional visitors to the island and thereby that this results in tourism spend on the island. The airfield is also identified as a lifeline medical facility as it is utilised by the air ambulance helicopter. The statement does not however directly attribute any specific requirement for the new building in relation to these particular matters although it would not be unreasonable to accept that any development identified as being essential for the continued operation/maintenance of the airfield would also sustain these existing activities and wider economic benefits.

The statement does not provide detail of any direct local employment that the airfield sustains or that might be increased or secured as a result of the proposed development.

#### **Locational Requirement for a 'Countryside' Site:**

The submitted information identifies that the location has been chosen by the Applicant to be:

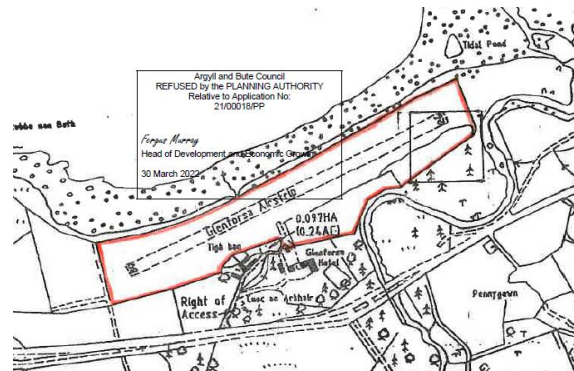
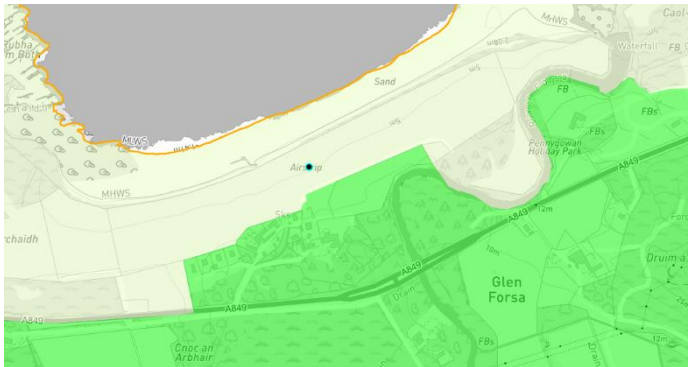
- *"away from the operational part of the airfield",*
- *"in an area less useful for farming but still accessible by vehicles";*
- that it is *"sited away from the Glenforsa Hotel and houses that border the airfield" "to avoid noise intrusion",*
- and in a *"location that is visually discreet".*

Whilst these factors are of some relevance they do, based on the information submitted to date, however appear to be matters of the applicant's preference as opposed to matters of operational/locational necessity. The submitted information does not include detail to inform how the choice of location impacts upon the operation of the airfield/management of agricultural land, nor does it identify how a building which is primarily identified as being required for storage would be likely to have a significant adverse impact upon the existing amenity of the locale/residential property.

Prior to accepting any operational argument for the development of an 'open' 'countryside' location it would also be appropriate to consider the suitability and availability of any land designated as 'Rural Opportunity Area (ROA), or any alternative locations within 'Countryside' where the proposed building might reasonably fall under the definition of 'infill', 'rounding-off' or, 're-development'.

The statement provided does not satisfactorily evidence any operational necessity or any other overriding factor that would require that the development be located at the specific location proposed within the 'countryside zone', or demonstrate that other locations within the airfield planning unit or any other adjacent land within the applicant's control that would be viewed more favourably within the context of the LDP Settlement Strategy have been considered prior to being discounted as either unsuitable or unavailable. (The relevant provisions of the LDP Settlement Strategy are set out under policy LDP DM 1 however SG LDP BUS 2 and Schedule B3 would also be an appropriate reference in assessing this aspect as this sets out in more detail a sequential approach to Use Class 6 development outwith defined 'settlement areas' and allocations).

The plans submitted by the applicant identify the extent of the airfield planning unit and it is noted that this includes other land designated as ROA, and 'Countryside' adjacent to existing built development that should be considered in terms of suitability to accommodate the proposed development in preference to an 'open countryside' location.



### Summary:

The provision of further information on the operation of Glenforsa Airport and the applicant's requirement for the proposed hanger building is welcomed and in general is of assistance to officers in understanding the context of the development and its intended function in relation to the existing operation of the airfield and circumstances of the applicant.

Whilst the statement does provide an indication that there could well be a genuine operational requirement for a new hanger/storage building it does not however sufficiently demonstrate that there is any overriding matter related to locational necessity or economic benefit that would necessitate the development being located at the proposed location within the 'open' 'countryside' as opposed to a 'preferred' location within the airfield planning unit.

**It is accordingly advised that the further information provided to the LRB is not considered to satisfactorily demonstrate an 'exceptional case' that would support development of an 'open' 'countryside' location in this instance having regard to the requirements of policy LDP DM 1 (E).**

It is further advised that, in the absence of an 'exceptional case' being satisfactorily demonstrated during the processing of the original application that officers have not undertaken an Area Capacity Evaluation (ACE) in respect of the proposed development and the capacity of the receiving landscape to satisfactorily absorb the development. Accordingly, no comment is provided on the 'Assessment' section of the further information other than to observe from initial reference to the SNH 'Landscape Assessment of Argyll and the Firth of Clyde' (1996) that the application site appears to be identified within the publication as being located within the 'Basalt Lowlands' Landscape Character Type as the starting point for assessment of landscape capacity/character.

Yours sincerely

Peter Bain  
Development Manager  
Development & Economic Growth

CC. – Schedule of Interested Parties

