

**Argyll and Bute Council
Development & Economic Growth**

Planning Application Report and Report of Handling as required by Schedule 2 of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 relative to applications for Planning Permission or Planning Permission in Principle

Reference No: 24/00745/PP
Planning Hierarchy: Local Development
Applicant: Highland Holidays
Proposal: Extensions and alterations to the internal layout of existing holiday park, including the installation of new water storage tanks and a sewage treatment plant (part retrospective)
Site Address: Oban Caravan and Camping Park, Gallanachmore, Gallanach Road, Oban

DECISION ROUTE

- Delegated - Sect 43 (A) of the Town and Country Planning (Scotland) Act 1997
- Committee - Local Government Scotland Act 1973
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(A) THE APPLICATION

(i) Development Requiring Express Planning Permission

- Extensions to existing holiday park (retrospective)
- Alterations to the internal layout of existing holiday park (part retrospective)
- Siting of 50 permanent units/caravans/lodges (part retrospective)
- Repositioning of 6 camping pods
- Repositioning of 3 chalets for use as permanent staff accommodation (retrospective)
- Siting of water tanks
- Provision of private water supply
- Installation of sewage treatment system (biodisc)

(ii) Other specified operations

- Landscaping
 - Use of land for the provision of 104 touring pitches (for touring caravans, tents and motorhomes)
 - Off Site Road Improvements
 - Provision of vehicular parking
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(B) RECOMMENDATION:

Having due regard to the Development Plan and all other material considerations, it is recommended that planning permission be granted subject the conditions and reasons appended to this report.

(C) CONSULTATIONS:

NatureScot

E-mail dated 12.06.2024, No formal comments to make as the proposal falls below the threshold for consultation: the site is not within a designated protected area and protected species are not known to inhabit the area. Advice offered with regards to landscaping (recommended that the current proposed tree, shrub and plant list is reviewed in full, with non-native species being replaced by native species) and the proposed water treatment plant as this part of the site lies within 50m of a well issue which feeds into the sound of Kerrera, which is part of the Inner Hebrides and Minches Special Area of Conservation (SAC) and is protected for its harbour porpoise. Advised that the proposed water treatment plant will be required to be sited/designed/constructed appropriately to eliminate contamination risks.

Flood Risk Assessor

Report dated 13.06.2024, No objections subject to the provision of a planning condition to ensure that surface water drainage is undertaken in accordance with CIRIA C753 at detailed design stage. Post development surface water runoff should be attenuated to pre-development amounts. The Flood Risk Officer has also advised that Finished Floor Levels (FFLs) of the units/caravans/lodges within the eastern section of the site should be elevated to at least 0.3m above the surrounding ground.

Oban Community Council

Report received 03.06.2024, objection raised on the grounds that it constitutes a radical change from the currently licensed position and will materially change the nature and scope of the current operation. The Impact of the proposals will be such that a full Environmental Impact Assessment should be requested, along with sufficient information to demonstrate compliance with relevant planning advice regulations. The proposed arrangements represent not only a significant increase in the number of people who can be accommodated on the site but also significantly increases the number of days that the facilities may be used.

To suggest that the proposed new 173 'units' are equivalent to the old 'units' is misleading. It is impossible to state precisely how many occupants there might be of tents, caravans or motorhomes but the reduction in these from 150 to 104 in favour of an additional 46 4-6 person 'lodges' would be expected to lead to a significant increase in the number of people on the site. In addition, the opening of the facility throughout the year, compared with the current limit of 216 days p.a. is likely to dramatically change the overall 'person days' that the site supports....

This is not an application for 'minor extensions' nor for 'consolidation' but, rather, the development of an entirely different scale and nature. This amounts to a new development rather than an extension to an existing business, the development of a holiday village in fact, requiring consideration as a complete redevelopment and, as such, should be supported by an Environmental Impact Assessment.

Oban Community Council offer their own assessment of the proposed development against National Policy Framework 4 and the Local Development Plan. The points raised by the Oban Community Council will be addressed in Appendix A below.

Scottish Water

Letter dated 27.05.2024, No objections.

Councils Roads Authority

Report dated 29.01.2025, No objections subject to conditions with regards to the provision of:

- An additional passing place at a location between Kilbowie Lodge and Tigh-a-Chaolais.
- Additional passing places in the section of road from the site access to the junction with the U24 Glenshellach Road;
- Additional road marking and signage to be installed for road safety issues. Details and location to be agreed with Roads;
- Access at junction with public road to be constructed in accordance with Operational Services Drawing no SD08/004 (Rev B)
- No walls, fences, hedges etc greater than 1m in height will be permitted within 2m from the channel line of the public road. Visibility splays measuring 53m x 2.4m to be cleared and maintained;
- A system of surface water drainage is required to prevent water passing onto the public road;
- Parking and turning commensurate with the units to be provided;
- Refuse collection points to be provided at locations easily accessed and serviced by RCV.
- Turning heads required within internal roads serving site.

Environmental Health

Memo dated 05.08.2024, No objections subject to the provision of a condition to ensure that the site is adequately served for water provision and, does not have a detrimental effect on the water supplies of surrounding properties.

E-mail dated 11.03.2025 advising that Environmental Health have received a copy of a Caravan Site Licence application for Oban Holiday Park submitted by Highland Holidays. The application requests a licence for 42 Holiday Caravans (made up of 36 static vans and 6 glamping units) and 131 Touring pitches. The period of operation requested is 1st of March to 28th Feb (being assumed to mean open all year). Further advised that Short Term lets Licenses will not be required by those units that fall within the site licence as may be granted. Being already covered by a caravan site licence is one of the exemptions from STL licensing. Advised that any residential units (i.e. permitted to be lived in rather than for holiday use only) these will be required to have a residential site licence – no application has been made in this regard. Where staff are accommodated in caravans then these may also be required to be covered by a residential site licence (depending on number of vans put to such a use).

Environmental Health have advised that they have visited the site and did not note any major issues regarding the likely granting of a holiday/touring/site licence. Environmental Health are aware of ongoing concerns with regards to

drainage at the site and they will need to further discuss this with Building Standards to ensure that adequate drainage and disposal is put in place during the processing of this site licence application or within a short timescale should it be likely to be granted.

Development Policy

Consulted for biodiversity comments as no Biodiversity Officer in post when the application was submitted. No comments received.

Biodiversity Officer

E-mail dated 30.10.2025, No objections. Requested the provision of a detailed tree survey to ensure the protection of trees within the ancient woodland and a protected species survey. Agreed with the observations of Nature Scot with regards to the requirement for the provision of native trees at site. Tree Planting programme requested.

Core Paths

No response at time of report and no request for an extension of time.

Marine and Coastal Policy Officer

E-mail dated 30.10.2025, Advised that no comments to make.

(D) HISTORY:

23/01723/PP

Extensions and alterations to the internal layout of existing holiday park, including the installation of new water storage tanks and a sewage treatment plant (part retrospective), withdrawn 29.01.2024.

02/01292/CLAWU

Certificate of Lawfulness - Existing Use (Formation of Steps and Walkway, access to Gangway and Floating Pontoons), ISSUED 16.09.2002.

01/00925/REM

Erection of 6 Chalets, granted 30.07.2001.

Conditions

2. The proposed chalets shall be used for holiday occupants only and shall not be occupied by any person, family or group of people for more than 3 months in any one calendar year.

Reason: In accordance with the use applied for and as the proposed chalets, by reason of their lack of individual curtilages, would be unsuitable for use as permanent residential accommodation.

3. The landscaping shown on the approved plans shall be implemented no later than the first planting and seeding season following the commencement of the

development, (unless otherwise agreed in writing with the Council as Planning Authority) and thereafter shall be maintained to the satisfaction of the Council as Planning Authority for a period of ten years. Any losses of plant species to be included in the landscaping scheme, through disease, weather exposure, neglect or damage, shall be replaced, with equivalent species within one growing season.

Reason: In the interests of visual amenity and to help integrate the proposal into its surrounding landscape/townscape setting.

98/00455/COU

Change of use of land to form caravan and camping site, granted 21.05.1998.

Conditions

1. The landscaping shown on the approved drawing shall be implemented within the first planting and seeding season following the date of the approval (unless otherwise agreed in writing with the Council as Planning Authority) and thereafter shall be maintained to the satisfaction of the Council as Planning Authority for a period of ten years. No trees to be included within the landscaping scheme shall be felled and any losses of plant species to be included in the landscaping scheme, through disease, weather exposure, neglect or damage, shall be replaced with equivalent species within one growing season.

Reason: In the interest of visual amenity, in order to help integrate the static caravans into the surrounding landscaping setting.

2 The area marked "Area B" on the approved drawings shall only be used between the months of May and September, inclusively, and shall only be used as a camping ground for tents.

Reason: In the interest of visual amenity, in order to ensure that there are no caravans or other structures permanently sited within this area.

3. The Area marked "Area E" on the approved drawings shall be used for siting up to a maximum of 15 static caravans only and for no other purpose.

4. The area marked "Area F" on the approved drawings shall be used for siting up to a maximum of 150 tents/touring caravans/motor homes only and for no other purpose.

5. The area marked "Area C" on the approved drawings shall be used as a car park and as a holding area for touring caravans and motor homes and for no other purpose.

6. The area marked "Area G" shall be used as a camping ground for tents only up to a maximum of 15 tents and for no other purpose.

Reason: (3, 4, 5 and 6) In order that the Council may effectively control the numbers of and the location of all static caravans and touring caravans, motor homes and tents in order to minimise the impact of the development on the landscape of this part of the Knapdale/Melfort Regional Scenic Area, in accordance with approved Strathclyde Structure Plan 1995 Policy SAS 1 and in the interest of road safety in order that the Planning Authority can maintain control over the level of traffic presented by the development.

97/01718/OUT

Erection of 6 chalets, granted 26.06.1998.

(E) PUBLICITY:

The proposal has been advertised in terms of Regulation 20 and Neighbour Notification procedures, overall closing date 30.05.2024.

(F) REPRESENTATIONS:

(i) Representations received from:

29 objections and 14 expressions of support have been received in response to the application.

OBJECTIONS

Caroline Dalgliesh, Suil Na Mara, Gallanach Road, PA34 4QH (27.05.2024, 14.06.2024, 30.10.2024)

Kenneth MacKenzie, Taigh A' Chaolais, Gallanach Road, Oban, PA34 4PD, (22.05.2024)

Dr Alastair Hall, Oir Na Mara, Gallanach Road, Oban, PA34 4PD, (23.05.2024)

Matthew Slack, Gylen Park, Kerrera, PA34 4SX, (25.05.2025, 31.05.2024)

Mrs Val Hamilton, 3 Dungallan Terrace, Oban, PA34 4PB, (31.05.2024)

Mike Morgan, Puffin Dive Centre, Port Gallanach, Oban, PA34 4QH, (03.06.2024)

Anne Archer, Sealladh Breagha, Gallanach Road, Oban, PA34 4PD, (03.06.2024)

Tim Wright, Gallanachmore Cottage, Gallanach Road, Oban, PA34 4QH, (14.05.2024)

Ms Zoe Emma Andrews, Horse Shoe Cottage, Kerrera, PA34 4SX, (22.05.2024)

Robert Kincaid, Mount Stuart, Glenshellach Road, PA34 4QJ, (27.05.2024)

Fiona Kincaid Mount Stuart Glenshellach Road Oban Argyll and Bute PA34 4QJ (27.05.2024)

Helen Miller, Pinetrees, Glenmore Road, Oban, PA34 4PG, (31.05.2024)

Nicola Morgan, Puffin Dive Centre, Port Gallanach, Oban, PA34 4QH, (31.05.2024)

Dr Ian Reid, 2 Firgrove, Ardconnel Road, Oban, PA34 5DW, (06.06.2024)

Paula Baldry, 11 Mill Td Wells next the Sea, NR23 1HD, (09.06.2024)

Stewart MacKechnie, Pine Trees, Glenmore Road, Oban, PA34 4PG, (09.05.2024, 31.10.2024)

E A M Davidson, (no address given), (22.05.2024)

Ms Liz Drysdale, 7 Kilbowie Shore, Gallanach Road, Oban, PA34 4PE, (30.05.2024)

Mrs Alison Marshall, 5 Kilbowie Shore, Gallanach Road, Oban, PA34 4PE, (29.05.2024)

Dr Ann MacNeill, Gallanachmore Cottage, Gallanach Road, Oban, PA34 4QH, (15.05.2024)

Mark Walker Adamson, by email, (21.05.2024)

Alison MacKenzie, Taigh A Chaolais, Gallanach Road, Oban, (22.05.2024, 11.11.2024, 04.02.2025)

Janet McCowan ,Tigh An Rhuba, Gallanach Road, Oban, (22.05.2024)
Mr Duncan MacEachen, Hyskeir Ferry Croft, Oban, PA34 4SX, (29.05.2024)
Mrs Janet Heron, 6 Kilbowie Shore, Gallanach Road, Oban, PA34 4PE,
(29.05.2024)
Craig Dalgliesh, Suil Na Mara, Gallanach Road, Oban, PA34 4QH, (29.05.2025)
Alison Hall, Oir Na Mara, Gallanach Road, Oban, PA34 4PD, (30.05.2024)
Martin Stewart, Lenas House, Glenshellach Road, Oban, PA34 4QJ, (10.06.2024)
Philip De longh, 2A Gallanachbeg, Oban, PA34 4QH, (21.06.2024)

SUPPORTERS

Craig McBurney, by email, (06.05.2024)
Lys Hall , 18 Kilbride Avenue, Dunoon, PA23 7LH, (08.05.2024)
E M Hall, 89 Alexandra Parade, Dunoon , PA23 8AH, (08.05.2024)
Hilary Bond, by email, (10.07.2024)
Laura Kidd, 31 Townsend Drive, Selsey, West Sussex, PO20 0GA, (15.05.2024)
Nathan Robertson, 160 Dumbuck Road, Dumbarton, G82 3LY, (14.04.2024)
Elle Marshall, by email, (13.05.2024)
Scott Leslie, by email, (13.05.2024)
Jane McLean, by email, (14.05.2024)
Alexander McLean, by email, (14.05.2024)
Nicole Elson Cassels, 143 Galloway Drive, Culloden, Inverness, IV2 7LP,
(14.05.2024)
Ross Petro, (no address given, submitted via planning portal, (14.05.2024)
John Rawcliffe, by email, (14.05.2024)
Fiona Hughes, 7 Gareloch Brae, Shandon, Helensburgh. G84 8PJ, (14.05.2024)

Representations are published in full on the planning application file and are available to view via the [Public Access](#) section of the Council's website.

(ii) Summary of issues raised:

- Caravan site license granted by Environmental Health only permits caravans, tents and motorhomes to operate between 1st of April and 31st of October each year and 8 chalet buildings to be operated 11 months of the year. This licence is not held by the applicant and has not been transferred. The applicant has breached the conditions of this licence.

Officer Comment: This is not a material planning consideration. Environmental Health are responsible for the licensing and control of caravan sites.

- There was no existing development at the site prior to the installation of 33 lodges.

Officer Comment: The site is an established caravan and camping site. See content of report below.

- Planning applications 97/01718/OUT and 01/00925/REM permitted six lodges to be erected. Thus far there has been the erection of 33 unauthorised lodges with a prospective application to raise this number to 60. This clearly contravenes earlier planning decisions by the Council and I can find no reason to alter the Council's previous finding that the

development should be restricted and the type of mass development currently being undertaken at the holiday park is to the detriment of the local environment and its human and animal inhabitants.

Officer Comment: The site is an established caravan and camping site that was granted planning permission in 1998. Planning Conditions were attached to this permission in order to control the development at the site. The Council has to consider each planning application on its own merits.

- There is nothing in the original 1998 planning consent ref 98/00455/COU referring to eight chalet buildings. Surely in absence of planning permission for eight chalet buildings, this caravan site license is invalid and needs to be revoked?

Officer Comment: Planning permission 01/00925/REM was granted on the 30th of July 2001 for the erection of six chalets at the site. Three of these chalets were erected and this permission is live in perpetuity. Environmental Health are responsible for the licensing and control of caravan sites.

- Concerns with regards to support being received from third parties being disingenuous.

Officer Comment: Any individual, group or organisation can make comments of objection or support for a planning application while it is open for consultation.

- Contend that new additions to the site are not 'static caravans' but rather 'holiday lodges'. Some of these lodges are for sale openly on the applicant's website as an 'all year round home'. This includes a large lodge 45ft x 22ft, built to residential specifications, accommodating up to 7 people.

Officer Comment: The proposed units/caravans/lodges are either single or twin units and fall within the legal definition of a 'caravan' for planning purposes (definition of caravan contained in Assessment below.). The original caravan and camping site permission permits the siting of 15 caravans within the site which can be used on an all year basis with no restrictions on the use. The proposal for 10 of the proposed units/caravans/lodges to be used on an all year basis residentially is established and does not require the benefit of planning permission.

- Unauthorised development has taken place at the site without planning permission.

Officer Comment: The site has been the subject of an enforcement investigation which has resulted in the submission of this planning application. Section 33 of The Town and Country Planning (Scotland) Act 1997 provides that an application for planning permission may be made retrospectively for buildings or works constructed or carried out, or a use of land instituted, before the date of the application.

- The map does not appear to include the area of land on the shore side of the road, this has been previously used for tents.

Officer Comment: This area of ground does not form part of the established caravan and camping site and does not form part of this planning application.

- Concerns raised with regards to any proposed renovations to the WWII bunker.

Officer Comment: This area of ground does not form part of the established caravan and camping site and does not form part of this planning application.

- Buildings are included in the proposed site plan which do not form part of this application. Are we to assume that if approved, this site plan grants outline planning for them.

Officer Comment: The description of the proposed development does not include these buildings and therefore any grant of planning permission will not include these buildings which may be the subject of future planning applications for consideration.

- No disability/wheelchair access, No ramps.

Officer Comment: The site is largely an established caravan and camping site. No comments have been provided in response to the application by the Oban Disability Forum.

- Requirement for a drainage impact assessment in accordance with the requirements of Policy 62 of the LDP2.

Officer Comment: Policy 62 does require developers to submit a DIA as part of all significant new development proposals. The development proposed by this application seeks to improve and enhance an existing tourism offering at the site. It is proposed to slightly extend the site in order to provide a suitable flattened area of ground at the northern section of the site within which to comfortably and safely site a number of the proposed additional units/caravans/lodges. A further extension to the site is proposed at the western side which was proposed to accommodate the proposed biodisc which has since had to be relocated as a result of being too close to a well. The original caravan and camping site was generally in need of maintenance works which have largely been undertaken by the applicant. This proposal seeks to internally alter the layout of the site in order to provide additional units/caravans/lodges which will fulfil the needs and requirements of tourists. The Flood Risk Assessor has been consulted and has raised no objections to the proposed development subject to the provision of a planning condition to ensure that surface water drainage is undertaken in accordance with CIRIA C753 at detailed design stage. Post development surface water runoff should be attenuated to pre-development amounts. A note to applicant will also be required to advise as a recommendation that Finished Floor Levels (FFLs) to be elevated to at least 0.3m above the surrounding ground.

Landscape and Visual Impact

- The front of the site was well concealed from the site and the island of Kerrera by approx. 200 metres of old growth woodland which have now been cleared. In addition to this the site has been raised by 15 feet to give the multiple highly visible chalets a lovely view of the sound. Unfortunately this has massively impacted the character and setting of the sound. The development has been designed to maximise the view of the guests and situation of the chalets without taking into account the nature of the area and the beauty that is negatively impacting.
- The application states that the number of 'units' that will be accommodated at the site will not change and will accommodate inter alia 32 static caravans. The conditional planning permission 98/00455/COU only allowed for 15 static caravans (condition 3) so that the Council could 'effectively control the number and location of all static caravans.... In order to help minimise the impact of the development on the landscape of this part of the scenic area'.
- The applicant has been permitted to continue digging further and further up the hillside without the need for any environmental impact survey to have been carried out first. I expect this is with a view to further expansion of the caravan park.
- I object to the owners carrying out extensive renovations that include building a two lane road up the hill without an environmental assessment having been done.
- As has been evidenced by the illegal development thus far erected, the visual amenity of the site has virtually been destroyed. The lodges currently in situ, are a monstrous scar on the hillside.
- The application 23/01723/PP which referred to the same area and development of the current application referenced a change' area of 0.51 hectares. In fact, the total site area of retrospective and prospective development is circa 7 hectares. This considerably exceeds the 0.51 hectares the application erroneously suggested. The whole area of 7 hectares is within the APQ/LLA.
- The application invites the inference that the number of units currently permitted (tents and static caravans supra), should be interpreted to allow the erection of lodges. A lodge is not a 'like for like' substitute for a tent/caravan. The visual amenity and designation of the APQ/LLA from lodges, far outweighs temporary visual impairment caused by tents/caravans.
- The proposed lodges are to be sited higher up the hillside, thus will be in view from a wider area, and will require further ground disturbance and potentially further tree felling.
- The privacy afforded to Gallanachmore Cottage has been affected as there are a number of lodges with large decking areas overlooking. Planning and other decisions must be ECHR compliant (Article 8 of the European on Human Rights (privacy and a private life).

Officer Comment: See assessment below. There is an area of land to the immediate south of the application site which is the subject of an enforcement case with regards to works that have been undertaken to an existing track which is used for agricultural purposes. The site is largely an established caravan and camping site and it has been modestly extended to the north. This area of land lies within a designated 'Tourism Infrastructure' area as designated by the current Local Development Plan. The site is set well back from Gallanachmore Cottage which is

separated by a road and an established belt of woodland which occupies a steep embankment. The units/caravans/lodges are set back from this steep embankment. No further tree felling is proposed. Whilst the loss of a small number of trees and shrubs along the site frontage may have resulted in the site being marginally more visible from views from Kerrera, a condition requiring compensatory planting will ensure that the proposed development integrates well with the surrounding landscape.

- Objection to the use of the site for 12 months of the year.

Officer Comment: See assessment below.

- Increase in electricity demands.

Officer Comment: This is not a material planning consideration.

- No indication of any intention to install any renewable energy infrastructure.

Officer Comment: This application relates to internal alterations to an established caravan and camping site in order to increase the number of units/caravans/lodges that can be sited along with minor extensions to the site to provide a flat area to accommodate some of the proposed units/caravans/lodges. There is no requirement for the provision of any renewable energy infrastructure.

- This should have been treated at the onset as a major development.

Officer Comment: This application is not a major development. The majority of the site has the benefit of planning permission and is a developed site. The current application relates to internal alterations to an established caravan and camping site in order to increase the number of units/caravans/lodges that can be sited along with minor extensions to the site to provide a flat area to accommodate some of the proposed units/caravans/lodges. The minor extensions proposed do not propose development on an area of ground which is 2 hectares or more and so therefore the proposed development does not constitute major development.

- Water run-off from disturbed drainage has discoloured the sea water impacting on Puffin Dive Centre. Long term impact on undersea species.

Officer Comment: The Marine and Coastal Officer has been consulted and has raised no objections to the proposed development.

Roads

- The road along Gallanach is not fit for purpose for a caravan park with a significant increase in visitors. To permit a more than doubling/replacing of 'static caravans' with larger 'luxury lodges' would show the current authority to be demonstrating an incomprehensible disregard for the safety of both vehicular and pedestrian users of this road.
- Retrospective consent is being sought for the 33 lodges already erected and in use. Permission is sought to erect a further 27 lodges and

outbuildings. The capacity of the lodges erected without consent is 184 persons, the capacity of the lodges for which consent is sought is 162 persons. This clearly has implications for road usage and resources.

- The proposed development will result in a change in traffic. i.e more cars than campervans and mobile caravans which will be travelling significantly quicker.
- Tourism traffic passing the Kerrera Ferry slip will drive dangerously due to the parked traffic.
- I have noted that a planning application for Kilbowie has been awarded and the Roads Department have commented about Gallanach Road, so I am assuming that significant improvements will be required between Kilbowie and Gallanachmor. Should Highland Holidays not be subject to similar requirements?
- Concerns about the number of cars allowed to access the site as it is assumed that larger caravans/lodges may have more than one car at each, especially if different families are sharing larger accommodation.
- This road has no pavement provision from the end of Dungallon Park to the entrance to the holiday park and is also very narrow in places with little or no verge.
- *Officer Comment: The site is situated off the C34 Gallanach Road. The site is an established caravan and camping site which already generates a significant volume of traffic using the public road. The development which is the subject of this proposal is for extensions and alterations to the internal layout of the existing holiday park, including the installation of new water storage tanks and a sewage treatment plant (part retrospective). The site currently has planning permission to be used for the siting of 15 static caravans, 150 tents/touring caravans/motorhomes, 15 tents and 6 chalets which can be used all year round. The site also accommodates 6 small pods which are well established. Additional tents can be accommodated at an area known as 'Area B' between the months of May and September. In terms of numbers this equates to 192 pitches which can be in use all year round for the purposes of providing a place for tourists to stay. It is not possible to define an exact number of tourists that could be accommodated on site at any one time as there is no limitation on the size of tents, motorhomes and touring caravans. permanent units/caravans/lodges/pods, 6 pods, 3 chalets (for staff accommodation) and a maximum of 104 touring pitches for touring caravans. The total number of pitches (including the proposed units/caravans/lodges/pods) would be 173 for use throughout the year with no unit/caravan/lodg being able to be occupied on a permanent basis with the exception of the three chalets which will be used to provide staff accommodation. and the 10 replacement units/caravans/lodges which do not require the benefit of planning permission (see assessment below which contains legal definition of caravan for planning purposes).applicant has worked closely with the Roads Authority to agree the proposed access regime to serve the proposed development which includes the provision of:*
 - *An additional passing place at a location between Kilbowie Lodge and Tigh-a-Chaolais.*
 - *Additional passing places in the section of road from the site access to the junction with the U24 Glenshellach Road;*

- *Additional road marking and signage to be installed for road safety issues. Details and location to be agreed with Roads;*
- *Access at junction with public road to be constructed in accordance with Operational Services Drawing no SD08/004a;*
- *No walls, fences, hedges etc greater than 1m in height will be permitted within 2m from the channel line of the public road. Visibility splays measuring 53m x 2.4m to be cleared and maintained;*
- *A system of surface water drainage is required to prevent water passing onto the public road;*
- *Parking and turning commensurate with the units is to be provided;*
- *Refuse collection points to be provided at locations easily accessed and service by RCV.*
- *Turning heads required within internal roads serving site.*

Light

- Newly created light pollution visible from Isle Of Kerrera.
- *Officer Comment: Environmental health have been consulted and have raised no objections to the proposed development. A condition will be required in order to ensure that any details of proposed lighting are submitted for consultation with Environmental Health.*

Noise

- Noise pollution from the electricity generator situated on the hill above the site.
- Noise from intermittent sounds of chainsaws cutting down trees.
- Noise from the occupants residing in the units/caravans/lodges.

Officer Comment: Environmental health have been consulted and have raised no objections to the proposed development.

Biodiversity

- Harm to wildlife from rubbish
- The planning committee placed a specific prohibition on the felling of trees and the removal of plant species.
- Trees have been removed, and those responsible should be tasked with replacing the broad leaf trees they removed.
- The development carried out thus far has involved extensive felling of trees. Tree felling negatively impacts the wildlife habitat of owls, red squirrels, pine marten, deer and other birds and mammals. Those responsible for this site should be instructed to re-plant the extensive area of broad leaf trees already removed.

Officer Comment: See assessment below.

Sewage and drainage

- Off-site flooding concerns

Officer Comments: The site does not lie within an area at risk from coastal or fluvial flooding. There has been no requirement for consultation with SEPA as it falls below SEPA's threshold for consultation. The Flood Risk Assessor has been consulted as the site is identified of being in an area at risk from surface water flooding. The Flood Risk Assessor has been consulted in line with SEPA's standing advice as the site is identified of being in an area at risk of surface water flooding. The Flood Risk Assessor has been consulted and has raised no objections to the proposed development subject to the provision of a planning condition to ensure that surface water drainage is undertaken in accordance with CIRIA C753 at detailed design stage. Post development surface water runoff should be attenuated to pre-development amounts. A note to applicant will also be required to advise as a recommendation that Finished Floor Levels (FFLs) to be elevated to at least 0.3m above the surrounding ground.

- Newly created discharge directly into the sea caused by on site flooding and increase in waste water/chemicals from hot tub lodges.

Officer Comment: SEPA were not required to be consulted on this application as the proposed development falls outwith SEPA's threshold for consultation. A biodisc is proposed to be installed at the western side of the site which will be controlled by SEPA and Building Standards under their remit. Discharge from hot tubs to soakaway or surface waters will require CAR authorisation (unless this is a single domestic hot tub discharging to land or soakaway). The Flood Risk Assessor has been consulted in line with SEPA's standing advice as the site is identified of being in an area at risk of surface water flooding. The Flood Risk Assessor has been consulted and has raised no objections to the proposed development subject to the provision of a planning condition to ensure that surface water drainage is undertaken in accordance with CIRIA C753 at detailed design stage. Post development surface water runoff should be attenuated to pre-development amounts. A note to applicant will also be required to advise as a recommendation that Finished Floor Levels (FFLs) to be elevated to at least 0.3m above the surrounding ground.

Water supply

- Additional demands on the shared water supply caused by new hot tub lodges.
- Private water supply is not adequate and will dry up.
- Part (b) of Policy 58 is applicable.

Officer Comment: The Environmental Health Unit have been consulted with regards to the proposed private water supply and have raised no objections subject to a suspensive pre-start condition required to secure a report on the proposed private water supply to ensure that it is sufficient to serve the proposed development and does not impact on existing users of the same supply or adjacent supplies. Part (b) of Policy 58 of LDP 2 does not apply as there is no proposal to connect to the public water supply which is not feasible at this location.

(G) SUPPORTING INFORMATION**Has the application been the subject of:****(i) Environmental Impact Assessment Report:** Yes No (if Yes insert EIA topics below)**(ii) An Appropriate Assessment under the Conservation (Natural Habitats) Regulations 1994:** Yes No (if Yes attach as an appendix)**(iii) A Design or Design/Access statement:** Yes No

A Supporting Planning Statement has been submitted with the application the content of which is discussed in the main assessment of the application within Appendix A of this report.

(iv) Sustainability Checklists (with reference to the requirements of LDP2 Policy 04)TN06 Sustainability Checklist Yes NoTN07 Sustainable Buildings Checklist Yes No**(v) A report on the impact of the proposed development eg. Retail impact, transport impact, noise impact, flood risk, drainage impact etc:** Yes No (if Yes list supporting documents below)

(H) PLANNING OBLIGATIONS**Is a Section 75 agreement required:** Yes No (if Yes insert details of the terms and heads of agreement and grounds for refusal if not completed within 4 months below)

(I) Has a Direction been issued by Scottish Ministers in terms of Regulation 30, 31 or 32: Yes No (if Yes insert details of direction below)

- (J) **Section 25 of the Act; Development Plan and any other material considerations over and above those listed above which have been taken into account in the assessment of the application**
- (i) **List of all Development Plan Policy considerations taken into account in assessment of the application.**

National Planning Framework 4 (Adopted 13th February 2023)

Part 2 – National Planning Policy

Sustainable Places

- NPF4 Policy 1 – Tackling the Climate and Nature Crises
- NPF4 Policy 2 – Climate Mitigation and Adaption
- NPF4 Policy 3 – Biodiversity
- NPF4 Policy 4 – Natural Places
- NPF4 Policy 6 – Forestry, woodland and trees
- NPF4 Policy 9 – Brownfield, Vacant and Derelict Land and Empty Buildings (*includes provisions relevant to Greenfield Sites*)
- NPF4 Policy 12 – Zero Waste
- NPF4 Policy 13 – Sustainable Transport

Liveable Places

- NPF4 Policy 14 – Design, Quality and Place
- NPF4 Policy 18 – Infrastructure First
- NPF4 Policy 22 – Flood Risk and Water Management

Productive Places

- NPF4 Policy 29 – Rural Development
- NPF4 Policy 30 – Tourism

Argyll and Bute Local Development Plan 2 (Adopted 2024)

Spatial and Settlement Strategy

- Policy 02 – Outwith Settlement Areas
- Policy 04 – Sustainable Development

High Quality Places

- Policy 05 – Design and Placemaking
- Policy 06 – Green Infrastructure
- Policy 08 – Sustainable Siting
- Policy 09 – Sustainable Design
- Policy 10 – Design – All Development

Diverse and Sustainable Economy

- Policy 23 – Tourism Development, Accommodation, Infrastructure and Facilities

Connected Places

- Policy 32 – Active Travel
- Policy 35 – Design of New and Existing, Public Roads and Private Access Regimes

Policy 39 – Construction Standards for Private Accesses
Policy 40 – Vehicle Parking Provision
Policy 41 – Off Site Highway Improvements

Sustainable Communities

Policy 55 – Flooding
Policy 58 – Private Water Supplies and Water Conservation
Policy 60 – Private Sewage Treatment Plants and Wastewater Drainage Systems
Policy 61 – Sustainable Urban Drainage Systems (SUDS)
Policy 63 – Waste Related Development and Waste Management

High Quality Environment

Policy 71 – Development Impact on Local Landscape Areas (LLA's)
Policy 73 – Development Impact on Habitats, Species and Biodiversity
Policy 77 – Forestry Woodland and Trees
Policy 79 – Protection of Soil and Peat Resources

(ii) **List of all other material planning considerations taken into account in the assessment of the application, having due regard to Annex A of Circular 3/2013.**

- Third Party Representations
- Consultation Responses
- Planning History
- [ABC Technical Note – Biodiversity \(Feb 2017\)](#)
- [TN06 Sustainability Technical Note and Checklist \(Oct. 2023\)](#)
- [TN21 VII and LVIA Light Technical Note \(Oct. 2023\)](#)
- [SEPA Standing Guidance for Development Management \(Dec. 2022\)](#)

(K) Is the proposal a Schedule 2 Development not requiring an Environmental Impact Assessment: Yes No

The site area of the proposed extensions to the existing caravan and camping site has an area of approximately 0.51 hectares which is marginally above the Schedule 2 Threshold for Tourism and Leisure Development. However on the basis that the proposed private sewage treatment system has been relocated to an area of land within the established caravan and camping park, this proposed extension will no longer be necessary taking the area to under 0.5 ha. No development is now proposed on this area of ground and so therefore a Screening Opinion will not be necessary.

(L) Has the application been the subject of statutory pre-application consultation (PAC): Yes No (if Yes provide summary detail of PAC below)

(M) Does the Council have an interest in the site: Yes No

(N) Requirement for a pre-determination hearing: Yes No (if Yes insert details below)

In deciding whether to hold a discretionary hearing Members should consider:

- How up to date the Development Plan is, the relevance of the policies to the proposed development, and whether the representations are on development plan policy grounds which have recently been considered through the development plan process.
- The degree of local interest and controversy on material considerations, together with the relative size of community affected, set against the relative number of representations and their provenance.

At the time of writing, 29 objections and 14 expressions of support have been received to the application.

The main thrust of the objections raised relate to the unsuitability of the public road from which the application site is accessed and potential landscape impacts. In this regard the applicant has worked closely with the Council's Roads Authority to agree the proposed access regime to serve the proposed development.

It is considered that the proposed development would be of an appropriate scale to the natural and built surroundings and would integrate appropriately with the landscape setting. The site when viewed from Kerrera to the north and west from the public road is significantly backdropped as it is set against steep-sided hills which are contained within a vast highland mountainous backdrop. It is therefore the considered opinion of the Planning Authority that the proposal will not result in any significant adverse effects on the integrity of the area or the qualities for which it has been identified.

It is important to note that the site is a well established caravan and camping site which has planning permission to be used for the siting of 15 static caravans, 150 tents/touring caravans/motorhomes, 15 tents and 6 chalets which can be used all year round.

The proposed development is essentially for the change of use of two small parcels of land to enlarge the site boundary; the siting of an additional 50 units/caravans/lodges: repositioning of 6 pods; repositioning of 3 chalets for use as permanent staff accommodation; siting of water tanks; provision of private water supply and the installation of a sewage treatment plant. It should be noted that in the absence of proposed extensions to the caravan and camping site boundary that a Section 42 application could well have been submitted to change the layout of the existing caravan and camping site which could potentially have allowed for the number of static caravans and tent/motorhome and touring caravan pitches within this established site to be altered.

The siting of units/caravans/lodges within an existing established caravan and camping site which is designated within the adopted LDP as a "Tourism Infrastructure" area is a development type which is to be expected,

The main other concerns raised by objectors relate to biodiversity, use of the site, water and drainage and noise and light emanating from the site. It is the opinion of the Planning Authority that a suite of safeguarding conditions can address these concerns raised by objectors.

No objections have been received from consultees with regards to the proposed infrastructure to serve the proposed development.

It is the opinion of the Planning Authority that the representations received, together with officer assessment of the relevant planning issues contained within this report, provide all the information required to enable Members to make an informed decision based on all of the material planning considerations in this case.

In this instance it is not considered that the objections raise any complex or technical issues that have not been addressed in the current Report of Handling and it is not considered that a discretionary local hearing would add value to the planning process.

The determining factor in the assessment of this application is whether the proposed tourism development is consistent with the provisions of the adopted National Planning Framework 4 and Local Development Plan 2 and whether the issues raised by third parties raise material considerations of sufficient significance to withhold planning permission.

The proposed development is considered to be consistent with the provisions of both the adopted National and Local Policy with the issues raised by third parties not amounting to material planning considerations that have not been addressed through the processing of the planning application.

(O)(i) Key Constraints/Designations Affected by the Development:

- Site located within Local Landscape Area (Formerly known as APQ (Area of Panoramic Quality))
- Semi ancient woodland
- Risk of Surface Water Flooding

(O)(ii) Soils

[Agricultural Land Classification:](#)

Class 5.2 – Land capable of use as improved grassland.

[Peatland/Carbon Rich Soils Classification:](#)

Class 1

Class 2

Class 3

N/A

[Peat Depth Classification:](#)

0

Does the development relate to croft land? Yes No

Would the development restrict access to croft or better quality agricultural land? Yes No N/A

Would the development result in fragmentation of croft / better quality agricultural land? Yes No N/A

(O)(iii) Woodland

- Will the proposal result in loss of trees/woodland? Yes
 No
 (If yes, detail in summary assessment)
- Does the proposal include any replacement or compensatory planting? Yes
 No details to be secured by condition
 N/A

(O)(iv) Land Status / LDP Settlement Strategy

- Status of Land within the Application Brownfield
 (tick all relevant boxes) Brownfield Reclaimed by Nature
 Greenfield

ABC LDP2 Settlement Strategy
 (tick all relevant boxes)

- Settlement Area
 Countryside Area
 Remote Countryside Area
 Helensburgh & Lomond Greenbelt

ABC LDP2 Allocations/PDAs/AFAs etc:

Tourism Infrastructure Area

(P) Summary assessment and summary of determining issues and material considerations

Planning permission is sought for extensions and alterations to the internal layout of an existing holiday park, including the installation of new water storage tanks and a sewage treatment plant (part retrospective) at Oban Caravan and Camping Park, Gallanachmore, Gallanach Road, Oban.

The application site lies within an area identified as 'Countryside Area' (CA) where Policy 02 of LDP2 gives a presumption in favour of sustainable development where it is of an appropriate scale, design, siting and use for its countryside location, as set out in the relevant sustainable siting and design policies of LDP2.

Policy 02 further states that certain development will be supported, generally without the need for detailed environmental assessments, with these comprising, infill, redevelopment opportunities of clusters; or previously developed sites.

In CAs, where there are nature conservation or landscape designations in place, Policy 02 details that development proposals will have to demonstrate that they are compatible with the designation interests.

The site lies within a designated Local Landscape Area (LLA) (formerly Area of Panoramic Quality) where LDP2 seeks to promote a flexible approach to small scale development in the Countryside through Policies 02 and 71 which clarify when the planning authority may require submission of a Landscape Visual Impact Assessment (LVIA).

A Design and Access Statement has been submitted in support of the proposed development. The site has been visited on a number of occasions as part of an

enforcement investigation, the previously submitted application which has been withdrawn and the current proposal which is the subject of this application. A Sustainability Checklists has been submitted in support of the proposal.

From the information which has been submitted it has been concluded by officers that no further information is required in terms of landscape or visual impacts. The site is well contained within the landscape and is substantially backdropped by higher ground which has been experienced by Officers on the ground.

Consideration of these matters, alongside other relevant planning considerations, are assessed in further detail below.

As it stands the site is a well-established caravan and camping site which has planning permission to be used for the siting of 15 static caravans, 150 tents/touring caravans/motorhomes, 15 tents and 6 chalets which can be used all year round. Additional tents can be accommodated at an area known as 'Area B' between the months of May and September. There is no limitation on the number of tents that can be accommodated in 'Area B' at any one time. The original caravan and camping site also included a reception/shop, dwellinghouse with workshop, former café building, communal toilet block and a World War 2 Bunker.

The site is located along the coast of the Sound of Kerrera in an area known as Gallanach. The site lies towards the southern end of a scattered roadend settlement which lies approximately 3.5km to the southwest of Oban. Gallanach comprises a settlement and three farms, namely Gallanachmore, Gallanachbeg and Gallanach Home Farm, the latter being located close to Gallanach Castle. The site is set on the landward side of the public road which runs along the north western boundary of the site. The site is afforded long views to Kerrera. A woodland strip runs along the northern front end of the site on a steep slope of which a section forms part of an Ancient Woodland at the north western side of the site. The caravan park is set back in an elevated position which is well contained within the surrounding landscape.

The development proposed by this application seeks to improve and enhance an existing tourism offering at the site. It is proposed to slightly extend the site in order to provide a suitable flattened area of ground at the northern section of the site within which to comfortably and safely site a number of the proposed additional units/caravans/lodges. A further extension to the site is proposed at the western side which was proposed to accommodate the proposed biodisc which has since had to be relocated as a result of being too close to a well. The original caravan and camping site was generally in need of maintenance works which have largely been undertaken by the applicant. This proposal seeks to internally alter the layout of the site in order to provide additional units/caravans/lodges which will fulfil the needs and requirements of tourists.

The total number of units/caravans/lodges to be sited is 60 (including 10 static caravans which have been replaced with units/chalets/lodges which does not require the benefit of planning permission) being sited largely within the central part of the site. The lower section of the site which comprises a low lying grassed area of ground near the site entrance is to remain intact and will not be used to provide any pitches for camping purposes as it was previously used for.

The three chalets which were originally sited within the south eastern section of the site have been relocated on an area of ground to the immediate north west and are

being used to accommodate staff on all year round basis. It is proposed to relocate the 6 pods to an area of ground to the south west.

The site previously included 2 small water tanks on an area of higher ground to the south of the caravan and camping site. Four larger water tanks have been installed at this part of the site without the benefit of planning permission.

The proposal includes the installation of a new biodisc treatment plant in one of the two proposed extensions to the site at the western side. This proposed biodisc has now been relocated in response to a well issue that was highlighted by one of the consultees to an area of ground to the east which lies within the caravan and camping site.

The proposed units/caravans/lodges will be permanently sited with a total of 10 being proposed to be privately sold. Concerns have been raised by third parties with regards to the potential for these caravans/lodges being used on a permanent residential basis. The 3 chalets which have been relocated within the site are required to be used on a permanent residential basis for the purposes of providing all year round staff accommodation. The original caravan and camping site permission permits the siting of 15 caravans within the site which can be used on an all year basis with no restrictions on the use. The proposal for 10 of the units/caravans/lodges to be used on an all year basis residentially within the established caravan camping site is established and does not require the benefit of planning permission. The use of the three chalets on a permanent basis for the provision of staff accommodation is considered to be acceptable on the basis that it is a trade for the 5 previously sited static caravans that could be used on an all year basis residentially. No more units/caravans/lodges are permitted to be used on a permanent residential basis at the site. A condition will be required to ensure that 50 of the total units/caravans/lodges (including the 10 replacement units/caravans/lodges which are in situ) are used for holiday occupancy only and shall not be used as a principal or main dwelling.

The site is situated off of the C34 Gallanach Road and is served by a private access.

The application indicates the provision of a private water supply with a private drainage system comprising a biodisc treatment plant proposed due to the lack of public drainage infrastructure within the vicinity of the site

No objections have been raised by any of the consultees.

At the time of writing, representations had been received by the Planning Authority from 43 respondents in relation to this planning application. 29 respondents raise objection and 14 raise expressions of support.

The determining factor in the assessment of this application is whether the proposed tourism development is consistent with the provisions of the adopted National Planning Framework 4 and Local Development Plan 2 and whether the issues raised by third parties raise material considerations of sufficient significance to withhold planning permission.

The proposed tourism development is considered to be consistent with the provisions of the adopted National Planning Framework 4 and Local Development Plan 2 with the issues raised by third parties not considered to raise material considerations of sufficient significance to withhold planning permission.

Taking account of the above, it is recommended that planning permission be approved subject to conditions.

A full report is provided in Appendix A.

(Q) Is the proposal consistent with the Development Plan: Yes No

(R) Reasons why Planning Permission or Planning Permission in Principle Should be Granted:

The proposal is considered to be consistent with the relevant provisions of the Development Plan and there are no other material considerations of sufficient significance, including issues raised by third parties, to indicate that it would be appropriate to withhold planning permission having regard to Section 25 of the Act.

(S) Reasoned justification for a departure to the provisions of the Development Plan

N/A

(T) Need for notification to Scottish Ministers or Historic Environment Scotland:
 Yes No (If yes provide detail below)

Author of Report: L Cuthbertson

Date: 06.03.2025

Reviewing Officer: Tim Williams

Date: 06.03.2025

Fergus Murray
Head of Development & Economic Growth

CONDITIONS AND REASONS RELATIVE TO APPLICATION REF. NO. 24/00745/PP**Standard Time Limit Condition** (as defined by Regulation)**Standard Condition on Soil Management During Construction****Additional Conditions****1. PP - Approved Details & Standard Notes – Non EIA Development**

The development shall be implemented in accordance with the details specified on the application form dated 22.04.2024; supporting information and, the approved drawings listed in the table below unless the prior written approval of the planning authority is obtained for an amendment to the approved details under Section 64 of the Town and Country Planning (Scotland) Act 1997.

Plan Title.	Plan Ref. No.	Version	Date Received
Location Plan	2023_0008_00		23.04.2024
Site Plan – As Existing	2023_0008_02		23.04.2024
Site Plan	2023_0008_03		23.04.2024
Site Plan – As Proposed	2023_0008_01B		23.04.2024
Original ground level survey			25.07.2024
Plans and Elevations of Water Tanks	2023_008-04		23.10.2024

Reason: For the purpose of clarity, to ensure that the development is implemented in accordance with the approved details.

2. PP – Vehicular Access

Within 3 months of the date that planning permission has been granted, plans and particulars of the means of vehicular access to serve the development shall be submitted to and approved by the Planning Authority in consultation with the Roads Authority. Such details shall incorporate:

- An additional passing place at a location between Kilbowie Lodge and Tigh-a-Chaolais.
- Additional passing places in the section of road from the site access to the junction with the U24 Glenshellach Road;
- Additional road marking and signage to be installed for road safety issues. Details and location to be agreed with Roads;
- Access at junction with public road to be constructed in accordance with Operational Services Drawing no SD08/004(Rev b)
- No walls, fences, hedges etc greater than 1m in height will be permitted within 2m from the channel line of the public road. Visibility splays measuring 53m x 2.4m to be cleared and maintained;
- A system of surface water drainage is required to prevent water passing onto the public road;

- Parking and turning commensurate with the units is to be provided;
- Refuse collection points to be provided at locations easily accessed and service by RCV.
- Turning heads required within internal roads serving site.

The upgrades to the public road and the existing private access track (within ownership control of the applicant) shall be completed within 6 months of the date this permission or prior to the occupation of any of the additional units/caravans/lodges hereby permitted at the site (whichever occurs the first).

Reason: In the interests of road safety.

3. **PP – Surface Water Drainage – Further detail required**

Notwithstanding the provisions of Condition 1, the development shall incorporate a surface water drainage system which is consistent with the principles of Sustainable urban Drainage Systems (SuDS) compliant with the guidance set out in CIRIA's SuDS Manual C753. Post development surface water runoff should be attenuated to pre-development amounts. The requisite surface water drainage shall be operational within 6 months of the date of this permission or prior to the occupation of any of the additional units/caravans/lodges hereby permitted at the site (whichever occurs the first).

Reason: To ensure the provision of an adequate surface water drainage system and to prevent flooding.

Note to Applicant:

Further advice on SuDS can be found in SEPA's Standing Advice for Small Scale Development – www.sepa.org.uk

4. **PP – Landscaping Scheme and Biodiversity Enhancement Measures**

Within 3 months from the date of planning permission having been granted, scheme of boundary treatment, surface treatment and landscaping shall be submitted to and approved in writing by the Planning Authority. The scheme shall comprise a planting plan and schedule which shall include details of:

- i) Existing and proposed ground levels in relation to an identified fixed datum;
- ii) Existing landscaping features and vegetation to be retained; Details shall include tree protection measures to ensure that the Ancient Woodland which is located along the north western boundary of the site is afforded protection.
- iii) A tree planting plan (no non native trees to be included) which shall include tree compensatory measures along the northern boundary of the site.
- iv) Location design and materials of proposed walls, fences and gates;
- v) Proposed soft and hard landscaping works including the location, species and size of every tree/shrub to be planted;

- vi) A programme for the timing, method of implementation, completion and subsequent on-going maintenance;
- vii) A biodiversity statement demonstrating how the proposal will contribute to conservation/restoration/enhancement of biodiversity, and how these benefits will be maintained for the lifetime of the development.

All of the hard and soft landscaping works shall be carried out in accordance with the approved scheme unless otherwise approved in writing by the Planning Authority.

Any trees/shrubs which within a period of five years from the completion of the approved landscaping scheme fail to become established, die, become seriously diseased, or are removed or damaged shall be replaced in the following planting season with equivalent numbers, sizes and species as those originally required to be planted unless otherwise approved in writing by the Planning Authority.

All physical biodiversity enhancement measures (bird nesting boxes, 'swift bricks', wildlife ponds, bat and insect boxes, hedgehog homes etc.) shall be implemented in full within 6 months of the date that planning permission has been granted..

All biodiversity enhancement measures consisting of new or enhanced planting shall be undertaken either in accordance with the approved scheme of implementation or within 6 months of the date that planning permission has been granted.

The biodiversity statement should refer to [Developing with Nature guidance | NatureScot](#) as appropriate.

Reason: To assist with the integration of the proposal with its surroundings in the interest of amenity and in order to comply with the requirements of NPF4 Policy 3.

Note to Applicant:

The applicant is advised to observe the content of the consultation response which has been received from the Councils Biodiversity Officer.

5. **PP - Occupancy**

Notwithstanding the provisions of condition 1, That 50 units/caravans/lodges at the site shall be used for holiday occupancy only and shall not be used as a principal or main dwelling. The applicant shall maintain a register of occupancy to be made available to the planning authority upon request.

Reason: In order to define the permitted occupancy having regard to the existing lawful use of the site, and in order to comply with the provisions of policies LDP SG HOU 4 and SG LDP TOUR 1 of the Argyll and Bute Local Development Plan

6. **PP – Private Water Supply**

Within 6 months of the date of planning permission having been granted, an appraisal of the wholesomeness and sufficiency of the intended private water supply and the system required to serve the development shall be submitted to and approved in writing by the Planning Authority.

The appraisal shall be carried out by a qualified hydrologist and shall include a risk assessment having regard to the requirements of Schedule 4 of the Private Water

Supplies (Scotland) Regulations 2006 which shall inform the design of the system by which a wholesome and sufficient water supply shall be provided and maintained. The appraisal shall also demonstrate that the wholesomeness and sufficiency of any other supply in the vicinity of the development, or any other person utilising the same source or supply, shall not be compromised by the proposed development.

The required water supply system shall be installed in accordance with the agreed specification and be operational within 6 months of the date of planning permission having been granted or prior to the occupation of any of the additional units/caravans/lodges hereby permitted at the site (whichever occurs the first).

Reason: In the interests of public health and in order to ensure that an adequate private water supply in terms of both wholesomeness and sufficiency can be provided to meet the requirements of the proposed development and without compromising the interests of other users of the same or nearby private water supplies.

Note to Applicant:

Regulatory requirements for private water supplies should be discussed with the Council's Environmental Health Officers in the first instance.

7. **PP - Lighting**

Within 3 months of the date of planning permission having been granted full details of any external lighting to be used within the site shall be submitted to and approved in writing by the Planning Authority. Such details shall include the location, type, angle of direction and wattage of each light which shall be so positioned and angled to prevent any glare or light spillage outwith the site boundary.

No external lighting shall be installed except in accordance with the duly approved scheme.

Reason: In order to avoid light pollution in the interest of amenity.

Note to Applicant:

All external lighting should be designed in accordance with the Scottish Government's Guidance Note "Controlling Light Pollution and Reducing Light Energy Consumption" 2007, Annexes A and B. Site specific advice may be obtained by contacting the Council's Environmental Health Officers.

8. **Design**

Notwithstanding the provisions of condition 1, no further units/caravans/lodges shall be sited until full details of each type of unit/caravan/lodge to be sited have been submitted for the prior written approval of the Planning Authority.

Reason: In the interests of visual amenity.

COMMITTEE REPORT APPENDIX A – RELATIVE TO APPLICATION NUMBER:	24/00745/PP
PLANNING LAND USE AND POLICY ASSESSMENT	

1. Introduction

1.1. The proposal which is the subject of this planning application is seeking planning permission for the extensions and alterations to the internal layout of an existing holiday park, including the installation of new water storage tanks and a sewage treatment plant (part retrospective)

The site has the benefit of planning permission ref 98/00455/COU which was granted on the 21st of May 1998 for the change of use of land to form a caravan and camping site.

As it stands the site is a well established caravan and camping site which has planning permission to be used for the siting of 15 static caravans, 150 tents/touring caravans/motorhomes, 15 tents and 6 chalets which can be used all year round. Additional tents can be accommodated in a low lying part of the site near the entrance between the months of May and September. There is no limitation on the number of tents that can be accommodated in this area at any one time. The original caravan and camping site also included a reception/shop, dwellinghouse with workshop, former café building, communal toilet block and a World War 2 Bunker.

This application for planning permission (part retrospective) has been submitted as a result of a planning enforcement investigation by the planning authority. It was established that works were being undertaken in order to repair, maintain and upgrade the existing site. It was also established that a number of the existing static caravans at the site were being replaced by units/caravans/lodges which did not constitute development. The site owner was advised that that planning permission would be required for any development being undertaken over and above the replacement of the existing static caravans and chalets at the site with units/caravans/units/lodges. A further 21 units/caravans/lodges over and above the consented number of static caravans and chalets were then brought onto the site and groundworks were undertaken to slightly extend the site to the north in order to provide a suitable flattened area of ground. This resulted in an element of small scale tree felling and shrub removal at that part of the site. The existing access track which runs throughout the site was also the subject of maintenance works. Three of the chalets which have the benefit of planning permission (01/00925/REM) have been repositioned within the site and are being used for the purposes of providing staff accommodation (this permission is live in perpetuity and allows for a further three chalets to be sited). There are 6 small established pods which are located within the central part of the site.

Section 33 of The Town and Country Planning (Scotland) Act 1997 provides that an application for planning permission may be made retrospectively for buildings or works constructed or carried out, or a use of land instituted, before the date of the application.

The proposed development is essentially for the change of use of two small parcels of land to enlarge the site boundary; the siting of an additional 50 units/caravans/lodges; repositioning of 6 pods; repositioning of 3 chalets for use as permanent staff accommodation; siting of water tanks; provision of private water supply and the installation of a sewage treatment plant. It should be noted that in the absence of proposed extensions to the caravan and camping site boundary that a Section 42 application could well have been submitted to change the layout of the existing caravan and camping site which could potentially have allowed for the number of static caravans and tent/motorhome and touring caravan pitches within this established site to be altered.

The proposals which are the subject of this application are detailed in section 3 below.

2. Settlement Strategy

- 2.1. In terms of the adopted LDP2 the site lies within an area identified as 'Countryside Area' (CA) where Policy 02 of LDP2 gives a presumption in favour of sustainable development where it is of an appropriate scale, design, siting and use for its countryside location, as set out in the relevant sustainable siting and design policies of LDP2.

Policy 02 further states that certain development will be supported, generally without the need for detailed environmental assessments, with these comprising, infill, redevelopment opportunities of clusters; or previously developed sites.

In CAs, where there are nature conservation or landscape designations in place, Policy 02 details that development proposals will have to demonstrate that they are compatible with the designation interests.

The site lies within a designated Local Landscape Area (LLA) (formerly Area of Panoramic Quality) where LDP2 seeks to promote a flexible approach to development in the Countryside through Policies 02 and 71 which clarify when the planning authority may require submission of a Landscape Visual Impact Assessment (LVIA). In this instance the proposed development is not considered likely to have a significant adverse effect upon the LLA designation. The assessment of landscape matters is set out in Section 5.4 below.

The site is an existing caravan and camping site which contributes to the creation of a valuable tourism network, the presence of these facilities and the combination of these with other elements of tourist infrastructure providing mutual benefit to each other and the wider tourism economy. Those areas and facilities which are considered to contribute to the tourism network and may be vulnerable to change are safeguarded and identified in the Proposals Maps. Development proposals which might undermine the network will be resisted. The majority of the site is located within land which is designated as 'Tourism Infrastructure' by the current LDP2. A portion of the site at the western side lies outwith this designation.

LDP2 Policy 23 sets out a general presumption in favour of new or improved tourism facilities and accommodation. A detailed assessment of the matters identified under LDP2 Policy 23 are addressed within Section 5.13 below.

3. Application Site

The site is located along the coast of the Sound of Kerrera in an area known as Gallanach. The site lies towards the southern end of a scattered road end settlement which lies approximately 3.5km to the southwest of Oban. Gallanach comprises a settlement and three farms, namely Gallanachmore, Gallanachbeg and Gallanach Home Farm, the latter being located close to Gallanach Castle. The site is set on the landward side of the public road which runs along the northern boundary of the site. The site is afforded long views to Kerrera. A woodland strip runs along the northern front end of the site on a steep slope of which a section forms part of an Ancient Woodland at the western side of the site. The caravan park is set back in an elevated position which is well contained within the surrounding landscape.

The site is an area of open ground that is set over four tiers. The lower section is set slightly back from the public road and comprises a low lying grassed area of ground which has permission for tents (no limitation on the number) to be sited between May and September. The campsite access then rises towards the second tier of the site which comprises a cluster of buildings which includes the site reception building and 11 of the proposed permanent units/caravans/lodges (2 of which comprise of 2 units) and 3 permanent chalets which are being relocated from the south western corner of the site and are being used to provide staff accommodation. The three chalets were previously sited on the part of the site which has the benefit of planning permission ref 01/00925/REM for the erection of 6 chalets. The repositioning of these chalets for use as permanent staff accommodation and the siting of 11 of the proposed permanent units/caravans/lodges at this part of the site require the benefit of planning permission and are retrospective elements of this application.

The main access within the site runs past the existing reception building and rises to the third tier of the site which is the biggest part of the site. This part of the site has previously had permission for the siting of a number of the consented 15 static caravans which have all recently been replaced by 10 of the proposed permanent units/caravans/lodges. The replacement of these static caravans with the units which are in situ is not development that requires planning permission. Ten additional units have been sited in the northern section of the site encroaching onto an area of ground which does not form part of the original caravan and camping site. This area of ground is one of the two areas of ground which are proposed as extensions to the site.

An area of ground to the south of this part of the site accommodates 6 pods and 3 small buildings which provide facilities for campers at the site. The western section of the site is a grassed area of ground which is a camping area. A small playpark of wooden construction has been installed in this part of the site without the benefit of planning permission. The ground rises to the south of the playpark where a small communal toilet block is located. The ground then rises again to the east to the upper fourth tier of the site to an area of flattened ground where camper vans and touring caravans can be sited. Minor groundworks have been undertaken within this section of the site in order to even out the surface to allow the siting of additional units/caravans/lodges which form part of this proposal.

4. Proposed Development

The current application comprises of the following:

- Extensions to existing holiday park (retrospective)
- Alterations to the internal layout of existing holiday park (part retrospective)

- Siting of 50 permanent units/caravans/lodges (part retrospective)
- Repositioning of 6 camping pods
- Repositioning of 3 chalets for use as permanent staff accommodation(retrospective)
- Siting of water tanks
- Provision of private water supply
- Installation of sewage treatment plant

Part of the proposed development is to extend the site to the north in order to comfortably site additional units/caravans/lodges. This area of ground is very small and minor groundworks have been undertaken in order to slightly reduce the ground levels at various points. The applicant has submitted a plan illustrating the original site levels and a site plan which show the proposed site levels. From these plans it can be observed that the recent changes in site levels and proposed changes in site levels are fairly minor in nature.

The total number of units/caravans/lodges to be sited is 50 being sited largely within the central part of the site. The lower section of the site which comprises a low lying grassed area of ground near the site entrance is to remain intact and will not be used to provide any pitches for camping purposes as it was previously used for.

The three chalets which were originally sited within the south eastern section of the site have been relocated on an area of ground to the immediate north west and are being used to accommodate staff on all year round basis. It is proposed to relocate the 6 pods to an area of ground to the south west.

The site previously included 2 small water tanks on an area of higher ground to the south of the caravan and camping site. Four larger water tanks have been installed at this part of the site without the benefit of planning permission.

The proposal includes the installation of a new biodisc treatment plant in one of the two proposed extensions to the site at the western side. This proposed biodisc has now been relocated in response to a well issue that was highlighted by one of the consultees to an area of ground to the east which lies within the caravan and camping site.

The proposed units/caravans/lodges will be permanently sited with a total of 10 being proposed to be privately sold. Concerns have been raised by third parties with regards to the potential for these units/caravans/lodges being used on a permanent residential basis. The 3 chalets which have been relocated within the site are required to be used on a permanent residential basis for the purposes of providing all year round staff accommodation. The original caravan and camping site permission permits the siting of 15 caravans within the site which can be used on an all year basis with no restrictions on the use. The proposal for 10 of the proposed units/caravans/lodges to be used on an all year basis residentially is established at the site and does not require the benefit of planning permission. The use of the three chalets on a permanent basis for the provision of staff accommodation is considered to be acceptable on the basis that it is a trade for the 5 previously sited static caravans that could be used on an all year basis residentially. No more units/caravans/lodges are permitted to be used on a permanent residential basis. A condition will be required to ensure that 50 of the total units/caravans/lodges (including the 10 replacement units/caravans/lodges which are in situ) are used for holiday occupancy only and shall not be used as a principal or main dwelling.

The applicant is also proposing additional landscaping and planting within the site seeking to aid landscape value to the site. It is considered that appropriate landscaping measures

will ensure that the proposed development integrates well within the surrounding landscape.

5. Compliance with National and Local Development Plan 2 Policy

Argyll and Bute 'Local Development Plan 2' (LDP2) was adopted on 28 February 2024 which, together with NPF4 which was adopted on 13 February 2023, represent the Development Plan providing the policy background against which proposed developments are assessed.

The proposal is assessed against the relevant NPF4 Policies below which include details of the associated LDP2 policies.

5.1. NPF4 - Policy 1 – Tackling the Climate and Nature Crises

NPF4 Policy 1 seeks to prioritise the climate and nature crises in all decisions; it requires to be applied together with other policies in NPF4.

Guidance from the Scottish Government advises that it is for the decision maker to determine whether the significant weight to be applied tips the balance in favour for, or against a proposal on the basis of its positive or negative contribution to climate and nature crises.

In this case, given the nature of the development proposed and its alignment with all other relevant policies in NPF4 and those supporting policies in the adopted LDP, it is considered that the development proposed would be in accordance with the broad aims of NPF4 Policy 1 as underpinned by Policies 02 and 04 of pLDP2.

5.2. NPF4 Policy 2 – Climate, Mitigation and Adaption

NPF4 Policy 2 seeks to ensure that new development proposals will be sited to minimise lifecycle greenhouse gas emissions as far as possible, and that proposals will be sited and designed to adapt to current and future risks from climate change.

Guidance from the Scottish Government confirms that at present there is no single accepted methodology for calculating and / or minimising emissions. The emphasis is on minimising emissions as far as possible, rather than eliminating emissions. The Spatial Settlement Strategy set out within LDP2 seeks to deliver sustainable levels of growth by steering the majority of development to our existing settlements as these are where the most of our current infrastructure, services, employment opportunities, housing and community facilities are to be found, however LDP2 recognises that there are instances where a different approach to significant development has to be taken particularly where existing infrastructure or services are at capacity and where a more sustainable option would be to provide new facilities elsewhere.

It is considered that the proposed development would be consistent with Policy 2 of NPF4 having had due regard to the specifics of the development proposed and to the overarching planning policy strategy outlined Policies 02, 04 and 09 of LDP2.

5.3. NPF4 Policy 3 - Biodiversity

NPF4 Policy 3 seeks to protect biodiversity, reverse biodiversity loss and deliver positive effects from development and strengthen nature networks.

The applicant has submitted a Biodiversity Overlay Plan, Proposed Planting List, Biodiversity Enhancement Proposals Report and a Sustainability Checklist in support of the proposed development.

Nature Scot have been consulted and have advised that the proposal does not meet with their criteria for consultation.: the site is not within a designated protected area and protected species are not known to inhabit the area. Nature Scot have provided advice with regards to the proposed planting list. Nature Scot have recommended that this list is reviewed in full, with non-native species being replaced by native species which will aid with tackling biodiversity loss.

The Council's Biodiversity Officer has been consulted and has noted that the proposed site boundary lies within an Area of Ancient Woodland. The Biodiversity Officer has requested the provision of a detailed tree survey to ensure the protection of trees within the ancient woodland and a protected species survey and has agreed with the observations of Nature Scot with regards to the requirement for the provision of native trees at site. A tree planting programme has been requested and can be delivered via a planning condition. Conditions will also be required to ensure that the provision of an adequate landscaping plan taking the Biodiversity Officer's comments on board.

A small number of trees have previously been felled within the proposed northern extension of the site which lie within this Area of Ancient Woodland. No more tree felling is proposed as part of this application. Whilst the loss of these trees is disappointing the felling of trees within an Area of Ancient Woodland does not constitute development that would require the benefit of planning permission. A condition will be required to ensure that a detailed tree survey of the existing trees within the designated Ancient Woodland within the ground which is owned by the applicant is submitted to ensure the protection of these trees along with a scheme of compensatory tree planting. A protected species plan is not considered to be necessary as the site is a functioning established caravan and camping site which is full of human activity. The essence of the proposed development is to modestly extend the site to allow for a reconfiguration of the layout of the existing established site to allow for the siting of additional units/caravans/lodges. The majority of the site is a developed site already in use for the purposes of providing tourism. Nature Scot have advised that protected species are not known to inhabit the area. A tree planting programme has been requested which can be delivered by condition to ensure that any trees to be planted are entirely native.

The supporting Design and Access Statement states that:

'The application site is not specifically designated for its biodiversity value. Nevertheless, Policy 3 of the NPF states that all development proposals should contribute to the enhancement of biodiversity, including where relevant, restoring degraded habitats and building and strengthening nature networks and the connections between them. Proposals should also integrate nature-based solutions, where possible. Proposals for local development must therefore include appropriate measures to conserve, restore and enhance biodiversity, in accordance with national and local guidance. Measures should be proportionate to the nature and scale of development

With regards to the need in NPF4 Policy 3 to secure biodiversity improvements, it is not considered that there are any issues of compliance with Policy 3. No material biodiversity impacts have been identified in the assessment of this application by the Planning Authority.

The submitted application is accompanied by a detailed scheme of landscaping, and this has been designed in order to significantly enhance the overall biodiversity value of the site. The aims and objectives of Policy 3 of the NPF and Policy 73 of the LDP2 will therefore be fully met.

Over and above increasing the biodiversity value of the application site, appropriate landscaping measures will also help address any concerns that the Council might have with respect to impact on the character of the Local Landscape Area (LLA).'

Notwithstanding the plans, supporting information and biodiversity checklist submitted with the application, the Planning Authority is of the opinion that the proposed development provides the opportunity to provide further biodiversity enhancement and protection could be delivered by planning condition which would align with the broad aims of NPF4 Policy 3 and be consistent with the requirements of LDP2 Policy 73, Development Impact on Habitats, Species and Biodiversity.

5.4 NPF4 Policy 4 – Natural Places

NPF4 Policy 4 seeks to protect, restore and enhance natural assets making best use of nature-based solutions.

Part (a) of Policy 4 states that development proposals which by virtue of type, location or scale will have an unacceptable impact on the natural environment, will not be supported.

Part (d) of Policy 4 states that development proposals that affect a site designated as a local nature conservation site or landscape area in the LDP will only be supported where:

- i. Development will not have significant adverse effects on the integrity of the area or the qualities for which it has been identified; or
- ii. Any significant adverse effects on the integrity of the area are clearly outweighed by social, environmental or economic benefits of at least local importance.

The proposed development is not within any designated European site of natural environment conservation or protection, it is not located within a National Park, a National Scenic Area a SSSI or RAMSAR site, or a National Nature Reserve. Neither is it located within a site designated as a local nature conservation site or within an area identified as wild land.

The site is however located within a designated Local Landscape Area (LLA). LLAs are designated to safeguard and enhance the character and quality of a landscape that is valued locally or regionally. The site is located within a Local Landscape Area (LLA) which is identified as being within The Craggy Coast and Islands Landscape Character Type (SNH National Landscape Character Assessment). This Landscape Character Type encompasses the coastal area of rocky crags and lochs between Oban and Loch Craignish, and the near shore islands of Kerrera, Seil, Luing and Shuna. This landscape is a diverse landscape. The intricate coastal edge is cut by narrow sea lochs and sounds. This coastal landscape has been relatively well settled since prehistory. Strong containment is provided to the coastal edge by steep-sided hills to the east, the deeply indented coastal edge and knolly landform, giving an often small scale to the landscape. This is accentuated woodlands, small enclosed fields and settlement

The site is situated within landscape which is largely knolly in nature. The site itself is made up of stepped up terraces of ground that are largely flat running parallel with the sound of Kerrera. The site is well contained within the landscape being set against steep-sided hills.

A Design and Access Statement has been submitted in support of the proposed development which contains visuals. The site has been visited on a number of occasions as part of enforcement investigations and the previously submitted application which has been withdrawn and the current proposal which is the subject of this application. A Sustainability Checklist has been submitted in support of the proposed development.

From the information which has been submitted it has been concluded by officers that no further information is required in terms of landscape or visual impacts. The site is well contained within the landscape and is substantially backdropped by higher ground which has been experienced by Officers on the ground.

Overall it is considered that the proposed development would be of an appropriate scale to the natural and built surroundings and would integrate appropriately with the landscape setting. The site when viewed from Kerrera to the north and west from the public road is significantly backdropped as it is set against steep-sided hills which are contained within a vast highland mountainous backdrop. It is therefore the considered opinion of the Planning Authority that the proposal will not result in any significant adverse effects on the integrity of the area or the qualities for which it has been identified. The siting of units/caravans/lodges within an existing established caravan and camping site which is designated within the adopted LDP as a "Tourism Infrastructure" area is a development type which is to be expected,

It is not considered that the proposal to extend and revise the internal layout of the site with the siting of additional units/caravans/lodges will result in any significant adverse effects on the integrity of the area or the qualities for which it has been identified given that this is an existing Caravan and Camping Site.

The proposed development is considered to be consistent with NPF4 Policy 4 and does not conflict with Policy 71, Development Impact on Local Landscape Areas (LLA's)

5.5 NPF Policy 6 – Forestry, Woodland and Trees

NPF4 Policy 6 seeks to protect and expand forests, woodland and trees.

A small number of trees have previously been felled within the proposed northern extension of the site which lie within an Area of Ancient Woodland. No more tree felling is proposed as part of this application. Whilst the loss of these trees is disappointing the felling of trees within an Area of Ancient Woodland does not constitute development that would require the benefit of planning permission. A condition will be required to ensure that a detailed tree survey of the existing trees within the designated Ancient Woodland within the ground which is owned by the applicant is submitted to ensure the protection of these trees along with a scheme of compensatory tree planting

It is not considered that this limited tree loss will conflict with the overarching policy aims of NPF4 Policy 6. In this regard a condition will be imposed on the grant of permission to secure a detailed tree survey of the existing trees within the designated Ancient Woodland within the ground which is owned by the applicant is submitted to ensure the protection of these trees along with a scheme of compensatory tree planting. This approach satisfies the requirements of NPF 4 Policy 6 (b & c) and as underpinned by LDP2 policy 77.

5.6 NPF4 Policy 9 – Brownfield, Vacant and Derelict Land and Empty Buildings

NPF4 Policy 9 seeks to encourage, promote and facilitate the reuse of brownfield, vacant and derelict land and empty buildings, and to help reduce the need for greenfield development.

Part (a) of Policy 9 states that development proposals that will result in the sustainable reuse of brownfield land including vacant and derelict land and buildings, whether permanent or temporary, will be supported.

The development proposed by this application seeks to improve and enhance an existing tourism offering at the site. It is proposed to slightly extend the site in order to provide a suitable flattened area of ground at the northern section of the site within which to comfortably and safely site a number of the proposed additional units/caravans/lodges. A further extension to the site is proposed at the western side which was proposed to accommodate the proposed biodisc which has since had to be relocated as a result of being too close to a well. The original caravan and camping site was generally in need of maintenance works which have largely been undertaken by the applicant. This proposal seeks to internally alter the layout of the site in order to provide additional units/caravans/lodges which will fulfil the needs and requirements of tourists. The proposed development will essentially enhance, extend and modify an established tourism offering at this location.

In land use terms the proposed tourism development is compatible with the surrounding land uses which are mixed. It is considered that the site presents an opportunity for development that would embrace the existing characteristics, with the design complementing its surroundings in terms of density, appearance, height, scale, masses and finishes.

The proposed development aligns with NPF4 Policy 9 and does not conflict with Policies 02 and 05 of LDP2.

5. NPF4 Policy 12 – Zero Waste

NPF4 Policy 12 seeks to encourage, promote and facilitate development that is consistent with the waste hierarchy as defined within the policy document.

Policy 63 of LDP2 requires the provision of waste management within development sites. Development is required to make effective land use and layout provision for the storage, separation, recycling, composting and collection of waste with developers ensuring that the minimisation of waste generated during construction and demolition by the production of Site Waste Management Plans (SWMPs).

The development the subject of this planning application seeks to improve, extend and enhance an existing tourism offering at the site

The proposals incorporate the use of prefabricated, demountable components to minimise site waste and to reduce construction times.

Whilst this is a development likely to generate waste when operational, it will already benefit from regular waste uplifts by the Council and will be expected to comply with our adopted and enforced recycling and reuse strategy.

The proposed development is considered to be in compliance with NPF4 Policy 12 and does not conflict with the requirements of LDP2 Policy 63, Waste Related

Development and Waste Management which seek to ensure that effective provision for waste/recycling is provided within developments and the current proposal would raise no issue of conflict should permission be granted.

5.8 NPF4 Policy 13 – Sustainable Transport

NPF4 13 seeks to encourage, promote and facilitate developments that prioritise walking, wheeling, cycling and public transport for everyday travel and reduce the need to travel unsustainably.

The site is an established caravan and camping site which is located approximately 3.5km to the southwest of Oban.

The site is situated off the C34 Gallanach Road. The site is an established caravan and camping site which generates a significant volume of traffic using the public road. The development which is the subject of this proposal is for extensions and alterations to the internal layout of an existing holiday park. The current proposal will result in a decrease in the number of pitches for tents/touring caravans and motorhomes going from 150 down to 104. A further 15 tent pitches will also be removed from the site. The low lying grassed area of ground which has permission for tents (no limitation on the number) to be sited between May and September will no longer be used for this purpose and presents another decrease in the consented number of tent pitches. Ten units/caravans/lodges have replaced the 15 consented static caravans at the site and an additional 50 units/caravans/lodges are proposed which fall within the legal definition of caravan. The terms caravan and mobile home are interchangeable. The Mobile Homes Act 1983 interprets 'mobile home' as having the same meaning as Part 1 of the caravan Sites and Control and Development Act 1960. The legislation defines a 'caravan' as 'any structure designed or adapted for human habitation which is capable of being moved by road from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer), and any motor vehicle so designed or adapted'. Large twin units and units classed as 'chalets' can be classed as a caravan, if they are physically capable of being moved as one unit. It does not matter whether it would be lawful to transport a large caravan on the road. The maximum size of a caravan/mobile home is 20 metres in length (exclusive of any draw-bar), 6.8 metres in width and 3.05 metres in internal height.

The applicant has worked closely with the Roads Authority to agree the proposed access regime to serve the proposed development which includes the provision of:

- An additional passing place at a location between Kilbowie Lodge and Tigh-a-Chaolais.
- Additional passing places in the section of road from the site access to the junction with the U24 Glenshellach Road;
- Additional road marking and signage to be installed for road safety issues. Details and location to be agreed with Roads;
- Access at junction with public road to be constructed in accordance with Operational Services Drawing no SD08/004a;
- No walls, fences, hedges etc greater than 1m in height will be permitted within 2m from the channel line of the public road. Visibility splays measuring 53m x 2.4m to be cleared and maintained;
- A system of surface water drainage is required to prevent water passing onto the public road;

- Parking and turning commensurate with the units is to be provided;
- Refuse collection points to be provided at locations easily accessed and service by RCV.
- Turning heads required within internal roads serving site.

It can therefore be concluded that the proposed development does not raise any road safety issues with conditions to secure the required road highway improvements as requested by the Roads Authority.

With conditions to secure the requirements of the Roads Authority and the Council's Access Manager the proposed development is considered to be consistent with the broad aims of NPF4 Policy 13 and is consistent with the requirements of LDP2 Policies 32, 35, 39,40 and 41 of the LDP2.

5.9 NPF4 Policy 14 – Design Quality and Place

NPF4 Policy 14 seeks to encourage, promote and facilitate well designed development that makes successful places by taking a design-led approach and applying the 'Place Principle'.

NPF4 Policy 14(a) details that development proposals should be designed to improve the quality of an area whether in urban or rural locations and regardless of scale with Part (b) affording support to developments where they are consistent with the six qualities of successful places: Healthy, Pleasant, Connected, Distinctive, Sustainable and Adaptable.

Part (c) details that development proposals which are poorly designed, detrimental to the amenity of the surrounding area, or inconsistent with the six qualities of successful places, will not be supported.

The proposed units/caravans/lodges will be suitably spaced out and will each be of a standard design and being sited in a manner which will respect the existing form of the site. The site can legitimately be used for the siting of a number of touring caravans/motorhomes and tents as it stands on an all year basis. It is considered that the proposed extensions and internal alterations to the layout of the site will have very little impact upon the surrounding landscape. In this instance there is no requirement for the proposed development to have to be assessed against the six qualities of successful places as set out by NPF4 Policy 14(a) given the very nature of the site and its current land use.

Plans and elevations of the units/caravans/lodges haven't been submitted in support of this application and have been sought from the applicant. The proposed units/caravans/lodges are either single or twin units and fall within the legal definition of a 'caravan' for planning purposes. The supporting Design and Access Statement advises that 48 of the units/caravans/lodges will each accommodate 6 persons and that the remaining 12 will each accommodate 4 persons (this figure includes 10 of the units/caravans/lodges which have replaced the static caravans on the site). The units/caravans/lodges which are currently on the site are of a dark grey muted colour with the walls being clad with an engineered wood cladding. The applicant has submitted a list of internet links to illustrate the type of units/caravans/lodges which are currently at the site. A condition will be required to request details of the remaining units/caravans/lodges which are proposed to be sited to ensure that the proposal integrates well within the site and wider landscape without any significant adverse visual impact.

A small number of trees have previously been felled within the proposed northern extension of the site which lie within this Area of Ancient Woodland. No more tree felling is proposed as part of this application. Whilst the loss of these trees is disappointing the felling of trees within an Area of Ancient Woodland does not constitute development that would require the benefit of planning permission. The loss of these trees has marginally exposed this part of the site visually. The site is located within an area of developed countryside where development is largely visible. The site is substantially backdropped and it is considered that the proposed development will be well contained within the landscape.

In land use terms the proposed tourism development is compatible with the surrounding land uses which are mixed. The proposed development is it is considered to be relatively low key development that will respect and complement its surroundings. Overall it is considered that the proposed development will respect the existing character by taking opportunities to improve and enhance an existing tourist offering which will benefit the local economy.

The applicant is also proposing additional landscaping and planting within the site seeking to aid landscape value to the site. It is considered that appropriate landscaping measures will ensure that the proposed development integrates well within the surrounding landscape.

The development the subject of this planning application is considered to be in accordance with the broad aims of NPF4 Policy 14 and the sustainable siting and design policies of LDP2 namely Policy 5, Design and Placemaking, Policy 08, Sustainable Siting, Policy 09, Sustainable Design and Policy 10, Design: All Development which, in summary, collectively seek to ensure that developments are compatible with surrounding land uses, are sited sensitively within the landscape making use of existing infrastructure, are of an appropriate scale, sustainable design and finishes for their site; and ensure that no adverse visual or amenity impacts arise.

5.10 NPF4 Policy 18 – Infrastructure First

NPF4 Policy 18 seeks to encourage, promote and facilitate an infrastructure first approach to land use planning, which puts infrastructure considerations at the heart of placemaking.

The application indicates the provision of a private water supply with a private drainage system comprising a biodisc treatment plant proposed due to the lack of public drainage infrastructure within the vicinity of the site. Scottish Water have been consulted and have raised no objections to the proposed development. The Environmental Health Unit have been consulted with regards to the proposed private water supply and have raised no objections subject to a suspensive pre-start condition will be required to secure a report on the proposed private water supply to ensure that it is sufficient to serve the proposed development and does not impact on existing users of the same supply or adjacent supplies. The Council's Building Standards Service will apply sufficient control over the private drainage arrangements at Building Warrant stage.

With a condition to secure a report on the proposed private water supply, the proposed development aligns with NPF4 Policy 18 and is in accordance with LDP2 Policy 04, Sustainable Development, Policy 58, Private Water Supplies and Water Conservation and Policy 60, Private Sewage Treatment Plants and Wastewater Drainage Systems which seek to ensure that suitable infrastructure is available to serve proposed developments and give support to private water

supply and drainage arrangements where connection to the public systems is not available.

5.11 NPF Policy 22 – Flood Risk and Water Management

NPF4 Policy 22 seeks to strengthen resilience to flood risk and to ensure that water resources are used efficiently and sustainably.

As detailed at NPF4 Policy 18 above, the development the subject of this planning application proposes a private water supply, the details of which will be sought by planning condition.

A biodisc is proposed to be installed at the western side of the site which will be controlled by SEPA and Building Standards under their remit.

The Flood Risk Assessor has also been consulted and has raised no objections to the proposed development subject to the provision of a planning condition to ensure that surface water drainage is undertaken in accordance with CIRIA C753 at detailed design stage. Post development surface water runoff should be attenuated to pre-development amounts. A note to applicant will also be required to advise as a recommendation that Finished Floor Levels (FFLs) to be elevated to at least 0.3m above the surrounding ground.

With regards to the management of rain and surface water at the site, this will be controlled through a condition imposed on the grant of permission to secure a suitable sustainable drainage system for the site. The proposal raises no flood issues and aligns with NPF4 Policy 22 and LDP2 Policies 55, 58 and 60.

5.12 NPF4 Policy 29 – Rural Development

NPF4 Policy 29 seeks to encourage rural economic activity, innovation and diversification whilst ensuring that the distinctive character of the rural area and the service function of small towns, natural assets and cultural heritage are safeguarded and enhanced.

NPF4 Policy 29a and 29c provides direct support for development proposals in remote rural areas that contribute to the viability, sustainability and diversity of rural communities, including farms and diversification of existing businesses.

This proposal seeks to improve and enhance an existing tourism offering at the site.

In this regard, the proposed development is considered to adhere to NPF4 Policy 29 through the provision of appropriate development that assists in supporting balanced and sustainable rural populations.

5.13 NPF4 – Policy 30 – Tourism

NPF4 Policy 30 seeks to encourage, promote and facilitate sustainable tourism development which benefits local people, is consistent with our net zero and nature commitments, and inspires people to visit Scotland.

Policy 30(a) supports tourism development in locations identified in the LDP with a requirement in Part (b) of this policy for developments to take into account a number of criteria.

LDP2 Policy 23 sets out a presumption in favour of new or improved tourist facilities and accommodation where:

- The development is in a form scale and location which is consistent with its surroundings; and
- The proposals respect and integrate well with the landscape/townscape character and amenity of the surrounding area; and
- They are located in accessible locations, taking into account the scale and nature of the proposed development, and include proposals to widen the options for sustainable travel to access them (including public transport, cycling or on foot);and
- They are well related to the existing built form of settlement areas or the existing development pattern outwith the settlement areas and avoid dispersed pattern of development unless the developer has demonstrated a locational requirement based upon the need to be near to the specific tourist interest being exploited and that the proposed development will not undermine these interests.

The applicant contends that when assessing the application, the fact that it relates to an existing caravan and camping site must be given significant weight. The applicant also contends that the 'Tourism Infrastructure' designation already recognises and supports the aims and aspirations of Policy 30 of NPF4. The Planning Authority accepts this contention.

It is therefore considered that the site would present a suitable opportunity for improvements and enhancement including minor extensions and a revised site layout (to accommodate additional units/caravans/lodges) that would meet the needs of the applicant and contribute to the local economy whilst respecting the existing rural community and surrounding natural and built environment. In this regard, the development would be in accordance with the provisions of NPF4 Policy 30 as underpinned by Local Development Plan Policies LDP 5 and LDP 9, supplementary guidance SG LDP TOUR 1, and Policy 23 of the proposed Local Development Plan 2.

6. Public Representations

6.1 At the time of writing this report, representations had been received by the Planning Authority from 43 respondents in relation to this planning application, 29 respondents raise objection and 14 raise support.

7. Conclusion

7.1 The development proposed by this application is considered to be development that will improve and enhance the use of an existing caravan and camping site which largely lies within a designated 'Tourism Infrastructure' Area as identified within the LDP2.

The site is located within the designated CA within an LLA and has been supported by supporting information (including a Design and Access Statement) which has led officers to conclude that no further information is required in terms of landscape or visual impacts.

It is the considered opinion of the Planning Authority that the proposal will not result in any significant adverse effects on the integrity of the surrounding LLA area or the qualities for which it has been identified.

No objections have been received from consultees with regards to the proposed infrastructure to serve the proposed development.

The proposed development is considered to be consistent with the provisions of both the adopted National and Local Policy with the issues raised by third parties not amounting to material planning considerations that have not been addressed through the processing of the planning application.

Accordingly the application is recommended for approval subject to conditions.