



# Planning and Access Committee Meeting

## Agenda item 4

Monday 30 March 2026 at 2pm  
National Park Headquarters, Balloch

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**SUBMITTED BY:** Director of Place

<b>APPLICATION NUMBER:</b>	2023/0374/DET
<b>APPLICANT:</b>	Ardnagal Estates
<b>LOCATION:</b>	The Former Torpedo Factory Site Arrochar Argyll And Bute G83 7AD
<b>PROPOSAL:</b>	Erection of mixed-use visitor accommodation and leisure development comprising 14 no. holiday homes, 34 no. holiday lodges, 34-bedroom budget hotel, outdoor play area, associated parking and landscaping and temporary change of use of land to caravan site for the siting of 20 no. glamping pods, shower block and 6 no. motorhome pitches
<b>NATIONAL PARK WARD:</b>	Lomond North Ward
<b>COMMUNITY COUNCIL AREA</b>	Arrochar and Tarbet
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## 1. Summary and reason for presentation

- 1.1. This report relates to a planning application for erection of a mixed-use visitor accommodation and leisure development which would comprise 14 no. holiday homes, 34 no. holiday lodges, a 34-bedroom budget hotel, outdoor play area, associated parking and landscaping and temporary change of use of land to caravan site for the siting of 20 no. glamping pods, shower block and 6 no. motorhome pitches. The existing pier structure is proposed for retention with the removal of the steel frame building remnant above.
- 1.2. This planning application is for the class of development known as 'major development' as the overall site area exceeds 2 hectares. As a major application, pre-application consultation was required to have been undertaken by the applicant. The application is also accompanied by an Environmental Impact Assessment Report (EIAR).
- 1.3. The application is being presented to Committee as, in accordance with the Scheme of Delegation, applications for major development shall be determined by the Planning and Access Committee.

## 2. Recommendation

- 2.1. That Members:

**APPROVE** the application subject to the imposition of the conditions set out in **Appendix 1** of the report and the conclusion of a section 75 agreement/planning obligation incorporating the Heads of Terms summarised in **Appendix 2**.

### 3. Background

#### 3.1. Site Description

3.1.1. The application site, delineated in red in Figure 1, is located on the western shores of Loch Long, opposite Arrochar & Succoth. The site projects into the loch and views southwest. It is accessed from the A83 trunk road from two access points at the eastern and western edges of the site. An adopted public two-way road runs through the site. There is a pavement from the site leading to Succoth and Arrochar along the edge of the trunk road.

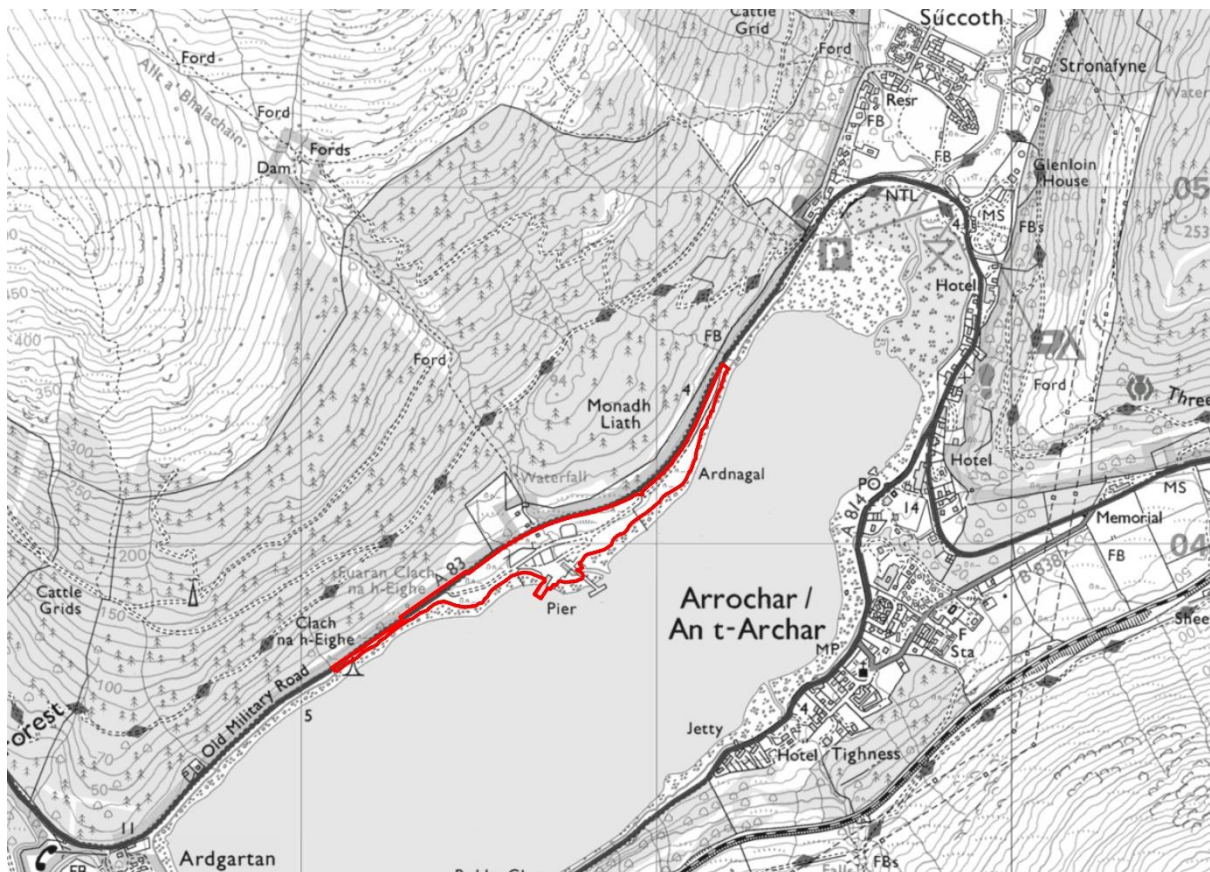


Figure 1 Location Plan

3.1.2. The application site is approximately 11 hectares and was a former Ministry of Defence torpedo testing station (operational from 1912 to 1986). At the current time, the site is partially derelict with roads and hardstanding left on site and the frame of the pier building on the southwest shore remaining. A longer timber pier and platform project from the southeast directly out into the loch.

3.1.3. There is a small burn, Allt a' Bhalachain, known as 'Buttermilk Burn', that runs off the slopes of Ben Arthur through the site. There is also a smaller burn 100m west of Allt a' Bhalachain. There are no protected ecological sites or core paths within the application site or surrounding the site. The

nearest core path is the footpath traversing the slopes of Ben Arthur which starts at the head of the loch.



Figure 2 Historic Photo of Torpedo Testing Site c.1930. (Source:<https://www.28dayslater.co.uk/threads/rntr-arrochar-torpedo-testing-station-loch-long-scotland-july-2020.123995/>)



Figure 3 Photographs of current condition of previously built areas on site

## 3.2. Description of Proposal

- 3.2.1. It is proposed to bring the site into use as a holiday development with a mixture of accommodation types including a bunkhouse (budget hotel), holiday lodges, self-build holiday homes, camping pods, campervan pitches. There would also be the creation of a play area and outdoor public space, including the pier. Existing internal roads would be maintained and new access and parking would be created.
- 3.2.2. The applicant has provided a masterplan of the proposed development footprint which is shown in Figure 4.



Figure 4 Proposed Masterplan

- 3.2.3. The proposed bunkhouse is a single storey building comprising 4 no. pitched roof sections linked with glazed corridors. It would have a reception, and two flexible use spaces. 34 of the bedspaces across 11 rooms would be for guests, with one accessible bedroom. Two bedspaces/one bedroom is reserved for staff accommodation.
- 3.2.4. The bunkhouse would be clad in larch and use black aluminium framed windows and shuttered concrete. It would have a black corrugated steel roof.



Figure 5 Artists Impression of Proposed Bunkhouse



Figure 6 Proposed Bunkhouse Floor Plan

3.2.5. It is proposed to have 16 one-bedroom, 15 two-bedroom and 3 three-bedroom lodges. The one- and two-bedroom lodges are single storey while the three-bedroom is two storeys.



Figure 7 Artists Impression of Proposed Lodges

- 3.2.6. The lodges would have larch timber cladding, black aluminium framed windows and slate roofs. Each would have a covered balcony area.
- 3.2.7. The proposed camping pods would be of a simple arched timber construction. Toilets, showers and waste disposal would be provided in simple timber buildings which would be sited in the camping pods car park. This car park would also include 6no. motorhome/campervan pitches with grass amenity space.

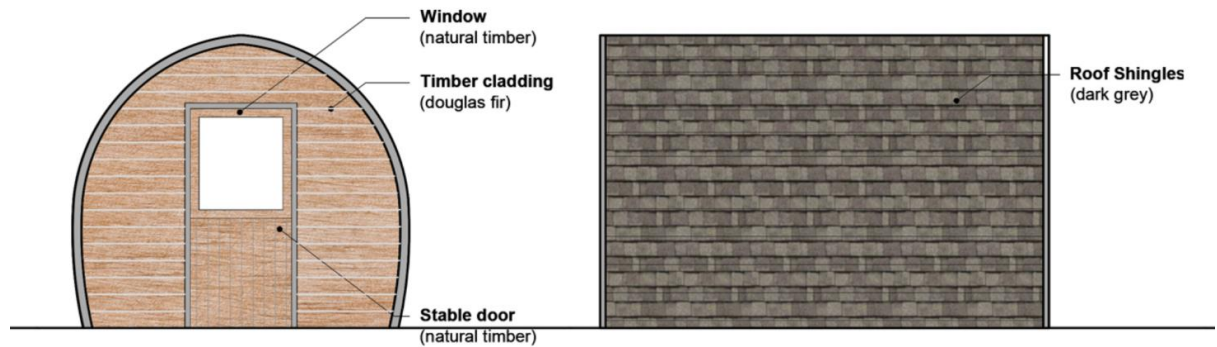


Figure 8 Elevations of proposed camping pod

- 3.2.8. The proposed 14 holiday home plots would be for sale as self-build plots. Meaning that the designs given at this stage are indicative, and it is proposed for the applicant to provide a design guide which would set out the parameters under which each house could be designed and built. The indicative design is a for a three-storey dwelling, using stone, timber and dark steel cladding.



Figure 9 Artists Impression of Indicative House Design

- 3.2.9. The pier structure is to be retained, with the remnant of the building removed. This would then form part of the landscaping of the overall site. Around the pier area would be overspill parking.
- 3.2.10. It is also proposed to alter the trunk road by widening the road and using a ghost island junction (a painted area of carriageway, often with cross-hatching which is used to separate lanes of traffic,) for those turning right into the site when approaching from the west. This will involve increasing the width of the road into the northern side of the A83.

### **3.3. Planning History**

- 3.3.1. The development site was in use by the Ministry of Defence from 1912 to 1986 as a torpedo testing station. In 2003 and with a renewal in 2009, planning permission was granted for the demolition and replacement of six semi-detached dwellings on the site, although these permissions were not implemented.
- 3.3.2. In 2012/2013 permission was granted for a large-scale tourism development on the site including a 130-bed hotel, 36 holiday lets, 16 dwellings and retail/café buildings. The proposal also included a pedestrian walkway along the loch edge to Arrochar & Succoth which was stepped away from the trunk road. A further permission at the same time permitted the demolition of 14 dwellinghouses on the site.
- 3.3.3. In 2016 an amenity notice was served on the land requiring demolition materials and fly tipping to be removed from the land and to close off the two vehicle access points. This was complied with by 2017.
- 3.3.4. The following planning history is relevant to the site.

PSC/2022/0004 - Enquiry/PAC completed  
EIA Scoping of mixed-use leisure and recreation development

2021/0456/PAC - Enquiry/PAC completed  
Formation of 20 residential plots. Erection of 40 holiday lodges, 20 glamping pods, 'bunkhouse', cafe/bar, marina and associated amenities

2016/0001/ENF – Amenity Notice effective 29 August 2016, complied with by 28 April 2017.

2012/0163/DET - Approve - 8 July 2013 (Expired)  
Erection of 130 bed hotel, 36 holiday accommodation units, 16 dwellinghouses, chandlery/cafe bar building, pedestrian walkway, parking and landscaping and other associated works

2012/0164/NDM – Approve – 18 September 2012 (Implemented 2013)  
Demolition of eight dwelling houses and six remnant dwelling houses

2009/0020/DET – Approve – 24 March 2009 (Expired)

Demolition of six semi-detached dwellings and erection of six replacement semi-detached dwellings (renewal of permission ref: LT/2003/0426/DET)

2003/0426/DET – Approve – 3 February 2004  
Demolition of six semi-detached dwellings and erection of six replacement semi-detached dwellings

97/00793/DET – Approve – 17 September 1998 (Expired)  
Refurbishment of six semi-detached dwellings

## **4. Environmental impact and habitat regulations assessment**

### **4.1. Environmental Impact Assessment (EIA)**

- 4.1.1. For the purposes of the Environmental Impact Assessment (Scotland) Regulations 2017, the National Park is identified as a 'Sensitive Area'. Tourism and Leisure development falls within Schedule 2 of The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 (section 12 'Tourism and Leisure' (c) 'Holiday villages and hotel complexes outside urban areas and associated developments'). A formal screening and scoping opinion were requested and subsequently provided by the National Park Authority in October 2022. The screening opinion concluded that an Environmental Impact Assessment (EIA) was required.
- 4.1.2. An Environmental Impact Assessment (EIA) accompanies the planning application. The Environment Impact Assessment Report (EIAR) reports the findings of the EIA. It outlines the methodology and assessment methods adopted, summarises the planning and policy context and includes several technical assessment chapters which document the aspects of the environment likely to be significantly affected by the proposed development. It comprises of a Non-Technical Summary (NTS), Volume 1 - Main Report, Volume 2 – Drawings and Figures and Volume 3 – Appendices. The EIAR supporting documents can be found at <https://eplanning.lochlomond-trossachs.org/OnlinePlanning/>

### **4.2. Habitat Regulations Assessment (HRA)**

- 4.2.1. The Habitats Directive, implemented in Scotland through The Conservation (Natural Habitats, &c.) Regulations 1994, provides protection to European sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)). The planning authority must consider whether development will have a 'likely significant effect' on a European site, and if so, an 'appropriate assessment' (AA) must be carried out. This process is known as Habitats Regulations Appraisal (HRA).
- 4.2.2. An AA is not required in this case as the proposed development would not be near to/impact upon any European sites.

## 5. Consultations and representations

### 5.1. Responses to Consultations

#### 5.1.1. Arrochar, Tarbet and Ardlui Community Council

No response at date of this report.

#### 5.1.2. Argyll and Bute Council Roads Authority

No objection subject to conditions.

#### 5.1.3. Transport Scotland - Trunk Road Network

No objection subject to conditions.

#### 5.1.4. Argyll and Bute Council Environmental Health

No objection subject to conditions securing the quality and sufficiency of the private water supply, an assessment of air quality and a contaminated land investigation.

#### 5.1.5. Argyll and Bute Council Flood Prevention

No objections subject to conditions securing the minimum finished floor level for 3no. dwellings.

#### 5.1.6. Scottish Environment Protection Agency

No objection.

#### 5.1.7. Scottish Water

No objection to the application. Advise there is capacity for public water supply with the nearest public water main 1.3km from the site. There is no public wastewater infrastructure in the vicinity of the development.

#### 5.1.8. Marine Directorate (previously known as Marine Scotland)

Advised no current aquaculture sites registered with the Marine Directorate located in the vicinity of the development.

#### 5.1.9. Kings Harbour Master

No response at date of this report.

#### 5.1.10. Clyde Port Authority

Advised the applicant that some of the works may require licenses from the Port Authority.

5.1.11. West Of Scotland Archaeology Service

No objection subject to a condition requiring a written scheme of investigation.

5.1.12. Health & Safety Executive

No response at date of this report.

5.1.13. Members of Parliament / Scottish Parliament and Councillors

The Planning (Scotland) Act 2019 introduced the requirement for Councillors, Members of the Scottish Parliament (MSPs) and Members of the UK Parliament to be notified of major applications. No responses have been received to this application at the date of this report.

## **5.2. Representations Received**

5.2.1. At the time of writing the report the application has received one representation in support of the application.

5.2.2. In summary the matters raised in support by The Friends of Loch Lomond and the Trossachs are:

- The site needs remediation which would be best achieved by a commercial solution.
- The proposals are low key and appropriate for the site. Support is given for the plans to recognise the potential of the existing berthing.
- High quality design, materials and finishes should be used on the site.
- The war time heritage of the site should be referenced prominently within the scheme.
- Planning permission should be conditional on regular contributions to a “Community Natural Capital Benefit Fund” which would be used for the preservation, promotion and understanding of natural capital. Examples of where this could be used are tackling INNS in woodland on the shores of Loch Long and in tackling marine litter which gathers at the head of the Loch.

5.2.3. Subject to the above caveats Friends of Loch Lomond and the Trossachs National Park have no objection to the application.

5.2.4. The above raised comments are addressed throughout the assessment but particularly in sections 8.2 for Principle of Development, 8.3 Trees and Woodland, 8.4 Ecology and Biodiversity Enhancement and 8.9 Sustainable Design and Amenity.

5.2.5. The full content of the representation is available to view on the National Park Authority’s Public Access website. Click on view applications, accept the terms and conditions then enter the search criteria as ‘2023/0374/DET’.

## 6. Policy context

### 6.1. The Development Plan

6.1.1. Section 25 of the Town and Country Planning (Scotland) Act 1997 states that planning applications are to be determined in accordance with the Development Plan unless other material considerations indicate otherwise. The Development Plan comprises National Planning Framework 4 (NPF4) and the Loch Lomond & The Trossachs National Park Local Development Plan (LDP) (adopted 2016) along with Supplementary Guidance.

#### National Planning Framework 4 (NPF4) (Feb 2023)

6.1.2. NPF4 is the fourth National Planning Framework for Scotland. It sets out the Scottish Governments priorities and policies for the planning system up to 2045 and how the approach to planning and development will help to achieve a net zero, sustainable Scotland by 2045. NPF4 supports the achievement of six overarching spatial principles (just transition, conserving and recycling assets, local living, compact urban growth, rebalanced development, and rural revitalisation) through the planning and delivery of sustainable, liveable and productive places. NPF4 contains 33 policies to guide development management decisions. The following NPF4 policies are relevant to this proposal:

- Policy 1 - Tackling the climate and nature crises
- Policy 2 - Climate mitigation and adaptation
- Policy 3 - Biodiversity
- Policy 4 - Natural places
- Policy 5 - Soils
- Policy 6 - Forestry, woodland and trees
- Policy 7 - Historic assets and places
- Policy 9 - Brownfield land, vacant and derelict land and empty buildings
- Policy 10 - Coastal development
- Policy 12 - Zero waste
- Policy 13 - Sustainable transport
- Policy 14 - Design, quality and place
- Policy 15 - Local living and 20-minute neighbourhoods
- Policy 16 - Quality homes
- Policy 17 - Rural homes
- Policy 19 - Heat and cooling
- Policy 20 - Blue and green infrastructure
- Policy 21 - Play, recreation and sport
- Policy 22 - Flood risk and water management
- Policy 23 - Health and Safety
- Policy 28 - Retail
- Policy 29 - Rural development
- Policy 30 - Tourism
- Policy 31 - Culture and creativity

- 6.1.3. Full details of these policies and background can be viewed at: <https://www.gov.scot/publications/national-planning-framework-4/documents/>

#### Local Development Plan (2017-2022)

- 6.1.4. The LDP outlines the vision for how the National Park should change over the next 20 years, including the strategy for development and the policy approach for key topics. There remains broad alignment between the LDP and NPF4 policies however, where any incompatibility does arise, then NPF4 prevails as the more recent policy. The following LDP policies are relevant to this proposal:

- OP1 - Overarching Policy 1: Strategic Principles
- OP2 - Overarching Policy 2: Development Requirements
- HP1 - Housing Policy 1: Providing a diverse range of housing
- HP2 - Housing Policy 2: Location and types of new housing required
- VE1 - Visitor Experience Policy 1: Location and Scale of new development
- VE2 - Visitor Experience Policy 2: Delivering a World Class Visitor Experience
- VE3 - Visitor Experience Policy 3: Safeguarding existing Tourism Sites
- TP2 - Transport Policy 2: Promoting Sustainable Travel and Improved Active Travel Options
- TP3 - Transport Policy 3: Impact Assessment and Design Standards of New Development
- NEP1 - Natural Environment Policy 1: National Park Landscapes, seascape and visual impact
- NEP4 - Natural Environment Policy 4: Legally Protected Species
- NEP5 - Natural Environment Policy 5: Species and Habitats
- NEP6 - Natural Environment Policy 6: Enhancing Biodiversity
- NEP8 - Natural Environment Policy 8: Development Impacts on Trees and Woodlands
- NEP 9 - Natural Environment Policy 9: Woodlands on or adjacent to development sites
- NEP11 - Natural Environment Policy 11: Protecting the Water Environment
- NEP12 - Natural Environment Policy 12: Surface Water and Wastewater Management
- NEP13 - Natural Environment Policy 13: Flood Risk
- NEP15 - Natural Environment Policy 15: Coastal Marine Area
- NEP16 - Natural Environment Policy 16: Land Contamination
- HEP3 - Historic Environment Policy 3: Wider Built Environment and Cultural Heritage
- HEP7 - Historic Environment Policy 7: Other Archaeological Resources
- OP2 - Open Space Policy 2: Protecting Other Important Open Space
- OP3 - Open Space Policy 3: New Open Space Opportunities
- CFP1 - Community Facilities Policy 1: Supporting New and Existing Community Facilities
- WMP1 - Waste Management Policy 1: Waste Management Requirement for New Developments

- 6.1.5. Full details of the policies can be viewed at: <https://www.lochlomond-trossachs.org/planning/planning-guidance/local-development-plan/>

### Supplementary Guidance

- 6.1.6. The adopted Supplementary Guidance provides support to the policies of the LDP and carries the same weight in the determination of applications. The Supplementary Guidance of relevance to this application comprises:
- Design and Placemaking
  - Housing

## **6.2. Other Material Considerations**

### National Park Aims

- 6.2.1. The four statutory aims of the National Park are a material planning consideration. These are set out in Section 1 of the National Parks (Scotland) Act 2000 and are:
- (a) to conserve and enhance the natural and cultural heritage of the area;
  - (b) to promote sustainable use of the natural resources of the area;
  - (c) to promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public; and
  - (d) to promote sustainable economic and social development of the area's communities.
- 6.2.2. If it appears that there is a conflict between those purposes, the National Park Authority shall attach greater weight to the purpose of conserving and enhancing the natural and cultural heritage of the area.

### National Park Partnership Plan (2024-2029)

- 6.2.3. Under Section 14 of the National Parks (Scotland) Act 2000, the National Park Authority must have regard to the National Park Partnership Plan (NPPP) in its decision making. Under 264A of the Town and Country Planning (Scotland) Act 1997, the National Park Authority in the exercise of any power under the planning Acts must ensure that special attention is paid to the desirability of exercising the power consistently with the NPPP. The NPPP is the overarching vision for the National Park and aims to deliver nine outcomes focussing on 31 objectives to be delivered from 2024-2029 which are listed under three themes: Restoring Nature, Creating a Low Carbon Place and Designing a Greener Way of Living.
- Section 1.1 Restoring Nature for Climate - 2045 Outcome: A natural carbon sink.  
2. Increase Tree Cover

- Section 1.3: Restoring Nature through Sustainable, Regenerative Land Use 2045 Outcome: An exemplar of regenerative land use.
  3. Encourage land use that benefits everyone
  
- Section 2.1: Connection Everyone with Nature and Climate- 2045 Outcome: A place for all to enjoy safely and responsibly.
  2. Support diversity and inclusion
  3. Support safe, responsible access
  
- Section 2.2: Improving Popular Places and Routes - 2045 Outcome: High quality visitor infrastructure and facilities.
  3. Provide a high-quality recreational path network
  
- Section 2.3: Low Carbon Travel for Everyone - 2045 Outcome: Low Carbon Travel for Everyone
  2. Make sustainable travel choices more attractive
  3. Improve travel routes and services
  
- Section 3.1: Transitioning to a Greener Economy - 2045 Outcome: A greener and more diverse rural economy.
  1. Increase sustainable tourism
  
- Section 3.2: Supporting Thriving Rural Communities - 2045 Outcome: More Resilient Rural Communities.
  1. Enable more local living and working
  
- Section 3.3: Developing and Investing in the National Park - 2045 Outcome: A responsive approach to new development.
  1. Deliver strategic development needs
  2. Adapt to climate change and restore nature
  3. Make the best use of land and assets

### Planning Guidance

6.2.4. The following guidance documents are relevant to the assessment of the application:

- Visitor Experience
- Sustainable and Active Travel
- Developer Contributions

### Arrochar and Tarbet Local Place Plan (2022-2030)

6.2.5. This plan identifies six priority areas, each with aims and actions, to reflect the concerns and aspirations of the community. The following actions are considered relevant to the assessment.

- Priority 1: Life in the Community  
Action: Invest in play parks and public spaces
- Priority 2: The Environment

Actions: Tackle derelict sites and buildings; tackle pollution, litter, marine debris and recycling; brighten up our villages; maintain and improve path and trail network; and promote sustainable land management.

- Priority 3: Homes and Population

Actions: Restrict and reduce number of holiday lets and second homes; and develop affordable homes for young people, families, workers and people with care needs.

- Priority 4: Getting About

Actions: Improve pedestrian and cycle safety through Tarbet, Arrochar and Succoth; and improve public/community transport.

- Priority 5: Visitors

Actions: Redevelop derelict torpedo testing station on Loch Long for visitor use; Maintain and improve path and trail network; invest in tourism; and designate 'area of pressure'.

- Priority 6: Jobs & Business

Actions: Diversify the local economy in environmentally sustainable ways; and create local accommodation for workers; Improve transport for workers from outwith the community.

### National Marine Plan

- 6.2.6. Scotland's National Marine Plan sets out objectives and marine planning policies for the marine environment with general policies and then more detailed sectoral policies including for recreation and tourism. There are objectives for Scotland to be a world class sustainable coastal and marine tourism and recreation destination, promoting sustainable development of new facilities and protection and enhancement of unique natural resources

### Clyde Regional Marine Plan (pre-consultation draft 2019)

- 6.2.7. The Marine (Scotland) Act 2010 allows for Regional Marine Plans to be developed to take account of local circumstances and smaller ecosystem units for inshore waters out to 12 nautical miles. The Clyde Regional Marine Plan is being developed to provide a statutory policy framework to support effective decision making and appropriate inward investment and to support the delivery of Scotland's National Marine Plan in a regional context. The Clyde Regional Marine Plan is currently in draft and subject to further consultation and amendment prior to adoption. As such the Clyde Regional Marine Plan, at the time of writing has minimal weight in decision making.

## 7. Summary of supporting information

7.1. The applicant has submitted the following documentation in support of the planning application:

*Design, Access and Sustainability Assessment* – A report setting out the reasoning for the proposed design including historical context and planning policy.

*Planning Statement, addendum and supporting letter* – Applicants assessment of the application against the development plan and other material considerations.

*Pre-Application Consultation (PAC) Report* – A statutory document which sets out what consultation was carried out prior to a major application being submitted. The document confirms they carried out the required events in 2021 and 2023.

*Transport Statement* – Report providing information on transport impacts and suitable mitigation measures.

*Road Audit* – A road safety audit to inform the proposed junction upgrade on the A83.

*Outline Arboricultural Impact Assessment* – A tree survey of the site with an impact assessment and proposed planting plan.

*Drainage Impact Assessment* – An assessment of the drainage requirements of the proposal.

*Letters of response to SEPA* – written responses to SEPA's initial and subsequent objections (now resolved) on flooding matters.

*Development Viability* – Confidential information provided on the financial viability of the development as justification for the holiday home plots.

## 8. Planning assessment

8.1.1. The key issues for consideration in the determination of this application are:

- Principle of Development
- Trees and Woodland
- Ecology and Biodiversity Enhancement
- Flood Risk
- Water Supply and Drainage
- Road Access and Parking
- Landscape
- Sustainable Design and Amenity
- Contaminated Land
- Archaeology

8.1.2. For each of the above issues the relevant policy background is set out and followed by an assessment of the proposed development. The overall assessment will be drawn to a conclusion in section 9.

### 8.2. Principle of Development

#### Policy Background

8.2.1. Arrochar & Succoth is identified in the LDP, Development Strategy Map as a “key area for future growth” where there are strategic tourism opportunities. The former torpedo testing site is allocated for “visitor experience” and is seen as an opportunity to develop Arrochar & Succoth as a marine gateway. The proposed development site is greater than the allocation boundary with approximately 16-17 of the proposed camping

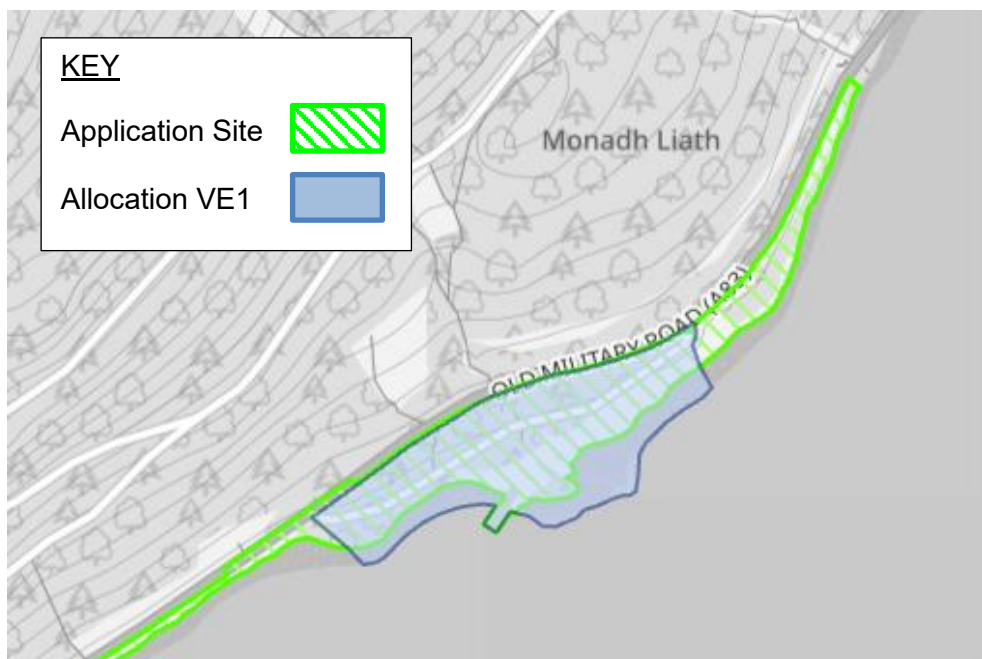


Figure 10 Map showing application site and extent of allocation

Pods outwith the eastern boundary and the access junction and trunk road works outwith the western boundary.

- 8.2.2. Visitor Experience Policy 1 (VEP1) part (a) supports new visitor facilities, accommodation and infrastructure where it forms an identified strategic tourism opportunity in the LDP. Visitor Experience Policy 2 (VEP2) requires arrangements for the long-term management and maintenance of communal areas within new holiday accommodation developments.
- 8.2.3. Policy 30 of NPF4 supports tourism development on sites identified within the LDP and requires all tourism related development to take into account:
- i. Contribution made to the local economy;
  - ii. Compatibility with the surrounding area;
  - iii. Impacts on communities;
  - iv. Opportunities for sustainable travel;
  - v. Accessibility for disabled people;
  - vi. Measures taken to minimise carbon emissions;
  - vii. Opportunities to provide access to the natural environment.
- 8.2.4. NPF4 Policy 9 a) supports proposals that result in the sustainable reuse of brownfield land. *“In determining whether the use is sustainable, the biodiversity value of brownfield land which has naturalised should be taken into account.”*

### Assessment

- 8.2.5. The proposal is on an allocated site which forms part of a strategic tourism opportunity identified in the LDP. The proposed development is a large-scale tourism development with multiple accommodation types which is commensurate with the allocation and development previously approved on the site. The scale of development outwith the allocation boundary is modest and does not raise any significant issues.
- 8.2.6. The proposal is supported in principle by Visitor Experience Policy 1 and under Policy 30 of NPF4, subject to the assessment of the development against other relevant policies and material considerations. Consideration of points i - vii of Policy 30 will be intrinsic throughout the assessment.
- 8.2.7. The proposed site area is largely brownfield land with some natural regeneration. Some of the development proposed is within undeveloped areas, principally where the camping pods are proposed. Subject to the

development being assessed as sustainable in the sections below, the proposed development is supported in principle under NPF4 Policy 9 a).

- 8.2.8. The proposed bunkhouse includes 2 larger spaces (approx. 85 and 103 metres square) which are labelled as “flexible classroom spaces”. The applicants supporting information further describes these as “training space with associated amenities” and “breakout space”. The intention has been to provide spaces suitable for community use.
- 8.2.9. The application includes 14no. holiday homes which would be sold on as self-build plots. Holiday homes would mean dwellings which are used as second homes and/or as short term holiday lets, they would not be used as a primary residence. The applicant has stated that the sale of these plots would financially enable the further development of the site.
- 8.2.10. There is a history of housing being on the site as recently as 2013 and 16no. dwellings were previously approved in 2013 (see planning history section 3.3), with that permission expiring in July 2016. At the time of the previous approval there was still housing on the site, and it was acceptable under policies at the time to approve replacement dwellings.
- 8.2.11. The applicant has provided financial justification for the proposed holiday home plots, demonstrating that the sale and development of these plots would contribute to financing for the overall development. Development costs at this site are likely to be higher due to the cost of remediation of the contaminated land, removal of INNS and works to improve the watercourse (as set out in the sections below). It is accepted that the housing plots contribute to the viability of the proposal and therefore the 14no. holiday homes are accepted in principle.
- 8.2.12. A legal agreement is recommended to secure a phased sale of the plots, ensuring the delivery of other elements of the overall development proposal. It is also recommended that the occupation of the dwellings as holiday/second homes only should be secured via this legal agreement. A standard occupancy condition is recommended on the remainder of the proposed tourism accommodation restricting occupancy by any one person or group to no more than 90 days in a calendar year.
- 8.2.13. Given the scale of the development and the mixture of accommodation types, Visitor Experience Policy 2 supports the use of a long-term management and maintenance plan for the communal and woodland areas of the site as a whole, which should also be secured by a legal agreement. This would ensure it is managed as a single entity in the long term.
- 8.2.14. Subject to the above referenced conditions and legal agreement, and to the development being assessed as suitable in all other respects, the proposed development is supported in principle.

## 8.3. Trees and Woodland

### Policy Background

- 8.3.1. NPF4 Policy 6 for Forestry, Woodland and Trees sets out the national approach to protecting and expanding tree cover. Part a) of this policy supports development which will enhance, expand and improve woodland and tree cover.
- 8.3.2. Policy 6 b) does not support development where it will result in:
- i. Any loss of ancient woodlands, ancient and veteran trees, or adverse impact on their ecological condition.
  - ii. Adverse impacts on native woodlands, hedgerows and individual trees of high biodiversity value, or identified for protection in the Forestry and Woodland Strategy.
  - iii. Fragmenting or severing woodland habitats, unless appropriate mitigation measures are identified and implemented in line with the mitigation hierarchy.
- 8.3.3. Policy 6 c) states, *“Development proposals involving woodland removal will only be supported where they will achieve significant and clearly defined additional public benefits in accordance with relevant Scottish Government policy on woodland removal. Where woodland is removed, compensatory planting will most likely be expected to be delivered.”*
- 8.3.4. The Scottish Government’s Policy on Control of Woodland Removal (PCOWR) defines public benefits as including social, economic and environmental benefits. If there are public benefits, approval should be conditional on the undertaking and delivery of those benefits.
- 8.3.5. PCOWR further details that compensatory planting should be at least an equivalent woodland area. Relevant examples of where loss of woodland with compensatory planting may be acceptable are where the proposal would contribute significantly to:
- Sustainable economic growth and rural/community development; and
  - Scotland as a tourist destination.
- 8.3.6. Natural Environment Policies 8 and 9 of the LDP for development impacts on trees and woodlands on or adjacent to development sites broadly align with NPF4 Policy requirements set out above.

### Assessment

- 8.3.7. The applicant’s assessment has been reviewed by the National Park Authority’s Trees and Woodland Advisor, and their advice has been incorporated into this assessment.
- 8.3.8. Within the EIAR submitted with the application it was initially identified that there would be 1.68ha of semi-natural broadleaved woodland habitat

loss. Dense scrub and scattered scrub were treated separately with an estimated loss of 0.79ha and 1.11ha respectively.

8.3.9. A follow up tree survey was required to be submitted as some of the scrub habitat, which has naturally regenerated, would likely be classified as woodland cover and a survey was required to fully understand the estimated habitat loss.

8.3.10. The Tree Survey describes the site as having “well-established native broadleaved woodland, riparian corridors, dense scrub and areas of formally planted conifers.” 20 individual trees and 10 tree groups were recorded on the site. A copy of the tree survey plan, indicating development footprint and compensatory planting is in Appendix C of this report.



Figure 11 Proposed Bunkhouse Floor Plan

8.3.11. Some of the tree groups shown in that plan (TG1, TG2, TG3 and TG10) are recorded on the Native Woodland Survey of Scotland which is shown in Figure 11. The following three native woodland habitat types, which are on the Scottish Biodiversity List identifying habitats of principal importance for biodiversity conservation in Scotland, were also identified:

- Upland birchwood
- Lowland mixed deciduous woodland
- Wet woodland

- 8.3.12. The survey sets out four categories of woodland: A, B, C and U. A is high quality with a life expectancy of at least 40 years and having good arboricultural, landscape and/or cultural value. Category B has trees of moderate quality with a life expectancy of at least 20 years; C is low quality with 10 years remaining life expectancy or stem diameter below 150mm. Category U is for trees unsuitable for retention.
- 8.3.13. TG1 and TG3, which is the woodland between the trunk road and the proposed development, and the riparian woodland around the stream running through the site, are surveyed as Category A. These are described as well-established native and riparian woodland. TG2, which is the largest area affected by the development, is surveyed as Category B. It is noted as being established native woodland with pockets of rock outcrops and less established scrub colonising previously developed brownfield areas.
- 8.3.14. The proposed development footprint avoids the areas indicated as Category A. It would result in the loss of 2.48ha of Category B and 0.78ha of Category C woodland, totalling 3.26ha. 1ha of compensatory planting is proposed throughout the site, particularly around the old pier area and interspersed around the development footprint. The applicant has indicated that they are also open to providing off-site compensatory planting within a site in Succoth at the head of the loch, which is within their ownership.
- 8.3.15. It is also noted that the applicant is proposing the removal of 1ha of Invasive Non-Native Species (INNS) within the site including Himalayan balsam, Japanese knotweed, montbretia, rhododendron and gunnera. The EIAR notes that, should the site remain undeveloped, it is likely that the INNS shall further colonise the area which will likely reduce the ecological value of the site.
- 8.3.16. Furthermore, if the development is approved, a condition would be required to secure the provision of compensatory planting and the long-term management and maintenance of the woodland.
- 8.3.17. According to PCOWR, the following are indicators of acceptability of woodland loss (subject to compensatory planting):
- Under sustainable economic growth and rural/community development: *“where a democratically formed community aim is judged to be in the wider interest”*
  - Under Scotland as a Tourist Destination where the development *“facilitates creation of new, significant and appropriate tourism facilities”* or delivers *“significant landscape enhancement.”*
- 8.3.18. The redevelopment of the former torpedo testing site is an established aim of the community, explicitly stated in the Local Place Plan and as an allocated site of the Local Development Plan. It is judged that the development of this site, which currently lies derelict and has issues

around anti-social behaviour, is in the wider interest of the community of Arrochar & Succoth as well as the wider National Park.

- 8.3.19. It is anticipated that the proposed development would be a significant tourism facility, providing accommodation for up to 336 number people over a variety of accommodation types. Additionally, through suitable management, the proposal could deliver significant landscape enhancements.
- 8.3.20. It is therefore accepted that the loss of woodland as a result of the proposed development is acceptable under Policy 6 c) of NPF4 as it can deliver significant and clearly defined public benefits. Compensatory planting is however required.
- 8.3.21. Compensatory planting should at least equal the net area of woodland lost. According to Scottish Government guidance, in certain cases, where there is a strong presumption against removal, e.g. within Native Woodland and the National Park, the compensatory planting must exceed the area of woodland to be removed to compensate for loss of environmental value. The National Park Trees and Woodlands Officer advises that a compensatory level of 1.2 times the loss would be appropriate for this site. This equates to an area of 3.9ha of compensatory planting being required.
- 8.3.22. The applicant has proposed 1ha of compensatory planting on site and it is accepted that they have maximised on-site planting opportunities. Therefore, 2.9ha of off-site compensatory planting would be required.
- 8.3.23. The applicant owns land in and around Succoth and they are proposing to develop 1.9ha of that site, which is under consideration as a separate planning application (reference 2024/0215/DET). The applicant has agreed that off-site compensatory planting could take place on this land and this can be secured via legal agreement.
- 8.3.24. Additionally, the proposed development would not result in the fragmentation or severing of woodland habitats and it would not result in the loss of any ancient woodlands or ancient or veteran trees. There are significant opportunities for overall biodiversity enhancements, particularly around the removal of invasive species, that if the site was to remain as it is, would be likely to proliferate and spread.
- 8.3.25. Overall, the proposed development accords with NPF4 policy 6 for forestry and woodland and the Scottish Governments Policy on the Control of Woodland Removal. The loss of woodland proposed is accepted subject to on- and off-site compensatory planting.

## 8.4. Ecology and Biodiversity Enhancement

### Policy Background

- 8.4.1. *Protected Species and Habitats:* NPF4 Policy 4 f) and Natural Environment Policy 4 of the LDP requires surveys to be undertaken to establish the presence of protected species, the predicted impacts on those species and any mitigation and/or compensation required. Development is not permitted if it would have an adverse impact on a protected species unless it meets relevant statutory tests. Natural Environment Policy 6 of the LDP protects habitats from adverse impacts unless certain conditions are met.
- 8.4.2. *Invasive non-native Species (INNS):* Natural Environment Policy 6 of the LDP requires development to enhance biodiversity by preventing the spread of INNS.
- 8.4.3. *Biodiversity Enhancement:* Under NPF4 Policy 3 b) “*Development proposals for national or major development, or for development that requires an Environmental Impact Assessment will only be supported where it can be demonstrated that the proposal will conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention. This will include future management. To inform this, best practice assessment methods should be used. Proposals within these categories will demonstrate how they have met all of the following criteria:*
- i. the proposal is based on an understanding of the existing characteristics of the site and its local, regional and national ecological context prior to development, including the presence of any irreplaceable habitats;*
  - ii. wherever feasible, nature-based solutions have been integrated and made best use of;*
  - iii. an assessment of potential negative effects which should be fully mitigated in line with the mitigation hierarchy prior to identifying enhancements;*
  - iv. significant biodiversity enhancements are provided, in addition to any proposed mitigation. This should include nature networks, linking to and strengthening habitat connectivity within and beyond the development, secured within a reasonable timescale and with reasonable certainty. Management arrangements for their long-term retention and monitoring should be included, wherever appropriate; and*
  - v. local community benefits of the biodiversity and/or nature networks have been considered.”*

### Assessment

- 8.4.4. The applicant’s assessment has been reviewed by the National Park Authority’s Natural Heritage Planning Advisor, and their advice has been incorporated into this assessment.

- 8.4.5. The baseline conditions of the site have been surveyed as follows.
- 8.4.6. *Protected Species:* One bat roost was located under a stone bridge although no activity was recorded during surveys which indicated the survey area has a low number of bats using the site. Signs of otters feeding were found, and suitable habitat is present for breeding birds, reptiles and amphibians.
- 8.4.7. *Habitats:* The development site is dominated by semi-natural broadleaved woodland and scrub, with bare ground and dilapidated buildings between. North of the site, on the opposite side of the road (A83), there is broadleaved woodland and plantation woodland. A Groundwater Dependent Terrestrial Ecosystem (GWDTE) was noted beside the Allt a' Bhalachain north of the development site.
- 8.4.8. *INNS:* A variety of INNS have been surveyed as widespread throughout the site including 0.7ha Himalayan Balsam, 0.3ha rhododendron and 0.3ha Japanese knotweed. Smaller stands of montbretia (crocsmia) were observed and 1 giant rhubarb (gunnera). The National Park Ecologist has also noted the presence of Buddleia Davidii on the site although this is not listed on Schedule 9 of the Wildlife and Countryside Act as an invasive plant.
- 8.4.9. The applicant assesses the future site baseline to continue to be used by protected species whilst the INNS are likely to spread resulting in reduction of biodiversity and ecological value.
- 8.4.10. The location of the proposed development above the high tide mark means it is unlikely to impact the marine environment, and the applicant has scoped this out from the EIAR. The National Park Authority agree with the scoping out of the marine environment, however, there would be a requirement for pollution prevention measures to be implemented during construction to protect the water environment.
- 8.4.11. The potential significant effects of the development during construction would be disturbance of protected species, habitat loss or degradation, spread of INNS and pollution events (including water, light and noise pollution).
- 8.4.12. As assessed above, the most significant loss of habitat is the loss of 3.26ha of woodland on the development site. Without mitigation, the applicant predicts this would have a moderate, significant effect. Likewise, the impacts on bats and otter, without mitigation, is moderate, significant.
- 8.4.13. The applicant predicts the operation of the site would have a negligible, non-significant effect on habitats. Impacts on otters and bats, from activity on the site are predicted to be minor, non-significant without mitigation.

- 8.4.14. The applicant has considered an Invasive Species Management Plan to be embedded mitigation as part of the proposal due to it being an offence to plant or otherwise cause to grow in the wild any invasive species. They have also factored in the requirement to have a licence from Nature Scot to disturb/destroy a bat roost (if this was necessary as part of the development).
- 8.4.15. Proposed mitigation measures include the requirement for a Construction Environmental Management Plan to be overseen by an Environmental Clerk of Works (ECoW). This would draw together good practice measures generally alongside site specific measures such as species protection plans and pollution prevention.
- 8.4.16. Pre-construction surveys would be required for protected species to measure the baseline of the site immediately prior to construction. If a change was identified in the baseline condition, then relevant mitigation should be drawn up. It is likely that species protection plans will be required for otters, breeding birds and bats.
- 8.4.17. The applicant has provided an Outline Biodiversity and Enhancement Management Plan (OBEHMP) to detail compensatory planting, wildflower and grassland planting, green swale features, installation of bird/bat boxes and the removal of INNS.
- 8.4.18. The National Park Authority broadly agrees with the proposed mitigation measures which would protect the environment during construction, and it is recommended that these are secured via condition. In addition, best practice measures for reptiles and amphibians, which may be using the rubble on site as habitat, should be incorporated into the CEMP.
- 8.4.19. Further mitigation measures are required to be ongoing during the subsequent operation of the site for protected species, and it is recommended that a condition secures a lighting management plan for good practice on artificial light that adheres to The Institute of Lighting Professionals (ILP) guidance GN 08/23 on Bats and artificial Light.
- 8.4.20. The OBEHMP provided by the applicant provides a solid basis for a Biodiversity Enhancement Plan and it is recommended that a detailed proposal is secured via condition alongside landscaping schemes and woodland management plans. This would ensure a comprehensive approach to the overall site management, increasing the connectivity of nature networks within and beyond the local area.
- 8.4.21. Suggested improvements to the OBEHMP include the planting of trees in groups to provide a nature network, a five-year management plan for INNS, to include the removal of Buddleia Davidi, to incorporate small tree planting within the proposed hedging and the ECoW to advise on the location and design of swales/bat boxes.
- 8.4.22. In the absence of a Scottish Biodiversity metric, it is difficult to absolutely quantify whether the proposed development would result in a net gain for

biodiversity. However, it is assessed that, following the timely implementation of appropriate landscaping, woodland management, removal of INNS, and compensatory planting, the development site, will be in a better condition than without intervention.

8.4.23. The proposed development site includes the landscaping of the pier area, and the site will be accessible by the public. It is anticipated that the site, when in operation, would be a community benefit in terms of access to nature and in improving habitat connectivity in the upper reaches of Loch Long.

8.4.24. Subject to the above-named mitigation being secured by condition, the proposed development accords with the policies of the LDP and NPF4 and the National Park Authority judges the residual effects of the development are likely to be non-significant.

## **8.5. Flood Risk**

### Policy Background

8.5.1. Natural Environment Policy 13 of the LDP supports development which complies with the flood risk framework defined by national planning guidance.

8.5.2. NPF4 Policy on Flood Risk and Water Management intends to *“strengthen resilience by promoting avoidance as a first principle and reducing the vulnerability of existing and future development to flooding.”*

8.5.3. Policy 22 of NPF4 sets out the current National Flood Risk Framework. Proposals at risk of flooding or in a flood risk area are only supported if they are for:

- i. “Essential infrastructure where the location is required for operational reasons;*
- ii. Water compatible uses;*
- iii. Redevelopment of an existing building or site for an equal or less vulnerable user; or*
- iv. Redevelopment of previously used sites in built up areas where the LDP has identified a need to bring these into positive use and where proposals demonstrate that long-term safety and resilience can be secured in accordance with relevant SEPA advice.”*

8.5.4. If development meets one of the above criteria the applicant must demonstrate that:

- *“All risks of flooding are understood and addressed;*

- *There is no reduction in floodplain capacity, increased risk for others, or a need for future flood protection schemes;*
  - *The development remains safe and operational during floods;*
  - *Flood resistant and resilient materials and construction methods are used; and*
  - *Future adaptations can be made to accommodate the effects of climate change.”*
- 8.5.5. Where development meets criteria iv above (where flood risk is managed at the site rather than avoided) the applicant would also be required to:
- *“Have the first occupied/utilised floor, and the underside of the development if relevant, to be above the flood risk level and have an additional allowance for freeboard; and*
  - *That the proposal does not create an island of development and that safe access/egress can be achieved.”*
- 8.5.6. Under NPF4 Policy 10 a) proposals in developed coastal areas are only supported where i. it does not result in the need for further coastal protection measures; and ii. is anticipated to be supportable in the long term, taking into account climate change.
- 8.5.7. *Surface water drainage:* Under NPF4 Policy 22 c) development proposals must not increase the risk of surface water flooding and should manage all rain and surface water through sustainable urban drainage systems which should form part of and integrate with proposed and existing blue-green infrastructure. Areas of impermeable surface should be minimised.

### Assessment

- 8.5.8. The site is indicated as being at risk from fluvial, coastal and surface water flooding as shown in Figure 12. Hydrology was scoped into the EIAR due to the risk of flooding and erosion to the proposed development. The site has complex flood risk from both coastal flooding and fluvial flooding from the Allt a' Bhalachain through the site.

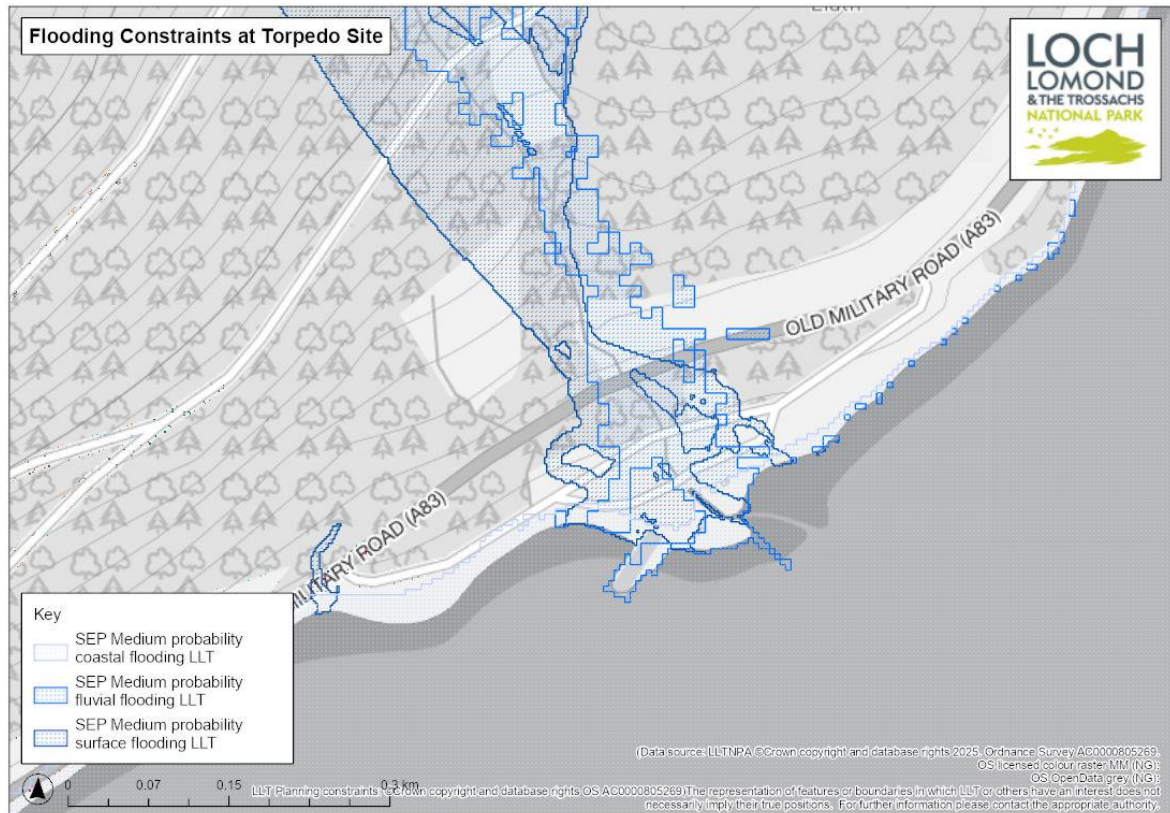


Figure 12 Map showing indicative flood risk

- 8.5.9. In terms of the principle of development, the site and proposed development are at risk of flooding / within a flood risk area and therefore it would need to meet one of the exceptions in Policy 22 a) i.-iv) to be supported in principle.
- 8.5.10. It is accepted that this site is previously used with clear signs of previous development including derelict buildings and brownfield land. The dwellings on site were demolished in 2013, and part of the pier building remains.
- 8.5.11. The site is allocated in the LDP and there has been a long-term aspiration for the site to be redeveloped due to its location on a key road through the National Park and its prominent loch side location close to Arrochar. The site has been in a dilapidated state for a considerable time and there is a need to bring it into positive use.
- 8.5.12. Whilst it is not within the settlement boundary of Arrochar, it is relatively close, being approximately 900m south of the Loch Long car park, immediately adjacent to the A83 and with the built development of Arrochar visible directly across Loch Long. The site is not a fully remote nor undeveloped area.
- 8.5.13. For the above reasons, the National Park Authority is of the opinion that the site fulfils the intent of NPF4 Policy 22 a) iv) and qualifies for an exception. It is still required for the proposed development to meet the

bullet points listed under Policy 22 a) as set out in paragraphs 8.44 and 8.45 above.

- 8.5.14. A flood risk assessment (FRA) was submitted as part of the EIAR and following initial consultation with SEPA and the Local Flood Authority a revised FRA was received in July 2024. Further objections were received, particularly around the proposed pier building, which included retail and café uses, categorized under SEPAs Land Use Vulnerability Guidance as ‘least vulnerable’ to flooding. It was not possible for the first occupied floor of this building to be above the flood risk level, as it would have required to have been raised by around 2 metres above the level of the existing pier. Even if this had been feasible, the land around the pier building would also require significant raising to ensure safe access and egress could be achieved during a flood event.
- 8.5.15. The applicant was offered the option to revise the pier building to a ‘water compatible use’ (exception ii under policy 22 a)), for example boat storage, maintenance & repair and toilets/changing rooms. This would have been exempt from the requirement to have the first occupied floor above the flood risk level. Following consideration, the applicant removed the pier building from the proposal and this is now proposed as public space.
- 8.5.16. The FRA identified risks from coastal flood events, out of bank flooding caused by debris blockages on the Allt a’ Bhalachain and an increased risk of surface water flooding from an increase of hardstanding in the area. Prior to mitigation, the applicant judges there is a potential for direct, temporary, short-term effect of major adverse significance.
- 8.5.17. The Allt a’ Bhalachain runs under the A83 into the site then within the site it runs under two bridges, described by the applicant as Torpedo Road Upstream Bridge and Torpedo Road Downstream Bridge and over a weir located at the outflow of the upstream bridge.
- 8.5.18. The concrete bridge deck just south of the downstream bridge is required to be replaced as it currently cannot convey the floodwater as modelled and would overtop. The FRA advises that the upper and lower bridges become surcharged (flow under pressure) but are not observed to cause out of bank flooding. These structures may be able to remain subject to structural and geotechnical assessments confirming their suitability for retention.
- 8.5.19. The applicant has proposed the following mitigation measures to reduce the impact of flooding on the development site:
- Minimum finished floor levels to be 0.6m above the coastal flood level of 5.9m AOD and modelled fluvial flood levels (variable depending on location).
  - No development is proposed within the area of “out of bank” flooding.

- Replacement structures (bridges and weirs) with new structures to be designed to the 1 in 200 year, plus climate change, plus 50% blockage event.
  - Containment measures to keep the 1 in 200 year, plus climate change, plus 50% blockage event within the banks of the burn. (e.g. flood walls on the upslope deck of bridge tied in with steeper topography upslope)
  - A comprehensive Drainage Strategy to survey and model the existing network and propose a new drainage system incorporating SuDS and a capacity to convey critical storm events without any flooding.
  - A Hydromorphological Assessment, factoring in coastal flooding, to inform suitable bed and bank protection to protect the burn channel from future movement and maintain the level of risk as assessed.
- 8.5.20. Subject to this mitigation, the applicant assesses the site to be at little or no risk from fluvial, coastal and surface water flooding. SEPA and the Local Flood Authority have no objection to the proposed development and are satisfied that the applicant has met the terms of Policy 22 a).
- 8.5.21. The proposed development does not result in the need for further coastal protection measures and the finished floor levels have taken into account long term climate change. The proposal is supported under NPF4 Policy 10 a).
- 8.5.22. The applicant has provided a Drainage Impact Assessment and draft drainage layouts. It is proposed that surface water from the site is collected and brought to two large attenuation tanks with filter material to provide treatment. Water would ultimately be released to the loch. Attenuation tanks work by temporarily storing excess stormwater runoff, releasing it slowly to mimic natural drainage.
- 8.5.23. The applicant has demonstrated a full understanding of the risks of flooding to the site and the development is designed to remain safe and operational during a flood event. Recommended mitigation, particularly in relation to drainage infrastructure and existing structures will ensure that there is no reduction in floodplain capacity and to make adaptations to accommodate the effects of climate change.
- 8.5.24. To ensure that the proposed development does not have a significant adverse impact on hydrology the proposed mitigation measures listed above should be secured by condition. Subsequently, the residual effects of the development in terms of flooding are anticipated to be negligible and the proposed development complies with NPF4 Policy 22.

## 8.6. Water Supply and Drainage

### Policy Background

- 8.6.1. *Water Supply:* NPF4 Policy 22 d) supports development which can be connected to the public water mains. Where connection is not feasible the applicant needs to demonstrate that water for drinking water purposes will be sourced from a sustainable water source that is resilient to periods of water scarcity.
- 8.6.2. *Wastewater Drainage:* The LDP requires development to connect to the public wastewater network under Natural Environment Policy 12 where possible. Where a private system is required, it must be designed to meet the Scottish Environmental Protection Agency's (SEPA) requirements for authorisation and must not create or exacerbate an environmental risk.

### Assessment

- 8.6.3. *Water Supply:* It is proposed for the development to have a private water supply (PWS). Scottish Water have commented that there is capacity in the Belmore Treatment Works to service the development, subject to further investigations if the applicant was to make a formal application for this. The nearest public water main is 1.3km from the proposed development.
- 8.6.4. The applicant has set out that there is existing historical PWS infrastructure from when the site was in operation as a torpedo testing station and that this would have served many people. The existing infrastructure includes tanks, pumps, filters and pipelines on the north side of the A83 at the Allt a' Bhalachain.
- 8.6.5. The applicant's position is that connection to the existing public water main is not feasible due to cost and their preferred option is to reinstate the existing PWS, subject to a full hydrological assessment.
- 8.6.6. All private water supplies are required to be registered with Argyll and Bute Council. The scale of the development means the proposed private water supply for the development would be a 'Regulated Supply' regulated by the Water Intended for Human Consumption (Private Supplies) (Scotland) 2017 and the responsibility for this lies with Argyll and Bute Council.
- 8.6.7. Argyll and Bute Council Environmental Health Officers have recommended a pre-start condition to secure this further appraisal of the wholesomeness and sufficiency of the intended private water supply to ensure the development will have a sustainable water source.

- 8.6.8. Overall, it is accepted that connection to the public water supply is unlikely to be feasible and a PWS is accepted in principle. The recommended condition from Environmental Health should be applied.
- 8.6.9. *Wastewater Drainage*: Scottish Water have advised that there is no Scottish Water Wastewater Infrastructure within the vicinity of the proposed development. It is accepted that a public connection is not feasible.
- 8.6.10. The applicants EIAR identifies, prior to the adoption of mitigation, a significant impact to water quality within designated shellfish waters due to new effluent discharges from the proposed development. They set out that an appropriate private wastewater system, to be authorised by SEPA, would fully mitigate this impact and the residual impact would be negligible.
- 8.6.11. The applicant has provided a detailed Drainage Impact Assessment which factors in surface water drainage alongside wastewater drainage. It is proposed to collect all foul water to two wastewater treatment plants (and tertiary treatment if required). The water would be discharged to a combined sewer and discharged to the Loch.
- 8.6.12. SEPA do not provide direct advice on wastewater drainage and instead refer planning authorities to their standing advice which is:
- Sites of all scales should be required to connect to the public sewer unless demonstrated as unviable.
  - Discharges should be avoided near water supplies for human consumption.
  - Campervan and motorhome waste disposal: applicants should follow A Guide for Independent Developments particularly for 'black water' (containing chemicals).
  - Discharges into designated bathing waters or into surface waters in the zones around these bathing waters or discharges near or into shellfish waters will require enhanced treatment to reduce pathogens in line with WAT-RM-13. Applicants are advised to contact SEPA at the earliest opportunity to discuss the required treatment standard
  - Authorisation under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended) (CAR) will be required for private foul drainage systems and developments with a population equivalent of over 100 are likely to require a complex licence.
  - Discharges from swimming/exercise pools/hot tubs to soakaway or surface waters will require CAR authorisation.
- 8.6.13. At this time, it is not proposed to have hot tubs nor to have campervan and motorhome waste disposal on the site. However, these might be

facilities that the applicant would wish to provide visitors in the future, at which point they would need to seek the relevant authorisations and permissions. Currently, a hot tub in of itself does not require planning permission but any structures around it (decking, canopy etc.) would require permission.

- 8.6.14. It is accepted that a public connection is not feasible and the applicant has provided a draft wastewater drainage solution. As the proposed solution would discharge into shellfish waters, enhanced treatment would be required, and this would be agreed with SEPA through their CAR authorisation process.
- 8.6.15. A condition is recommended requiring the applicant to have sought and received SEPA's authorisation prior to the development commencing. This will ensure that the development is not commenced before the underlying wastewater drainage infrastructure is suitably designed as this is a fundamental element of the design and layout of the proposal. Additionally, the applicant must demonstrate to SEPA that the proposed development would not have an adverse effect on designated shellfish waters prior to any development commencing.
- 8.6.16. Subject to this condition, it is the Planning Authority's assessment that the proposed development would not have a significant adverse effect on the environment in terms of water quality.

## **8.7. Road Access and Parking**

### Policy Background

- 8.7.1. NPF4 Policy 13 for sustainable transport sets out that b) *“Development proposals will be supported where it can be demonstrated that the transport requirements generated have been considered in line with the sustainable travel and investment hierarchies and where appropriate they:*
- i. Provide direct, easy, segregated and safe links to local facilities via walking, wheeling and cycling networks before occupation;*
  - ii. Will be accessible by public transport, ideally supporting the use of existing services;*
  - iii. Integrate transport modes;*
  - iv. Provide low or zero-emission vehicle and cycle charging points in safe and convenient locations, in alignment with building standards;*
  - v. Supply safe, secure and convenient cycle parking to meet the needs of users and which is more conveniently located than car parking;*

- vi. *Are designed to incorporate safety measures including safe crossings for walking and wheeling and reducing the number and speed of vehicles;*
  - vii. *Have taken into account, at the earliest stage of design, the transport needs of diverse groups including users with protected characteristics to ensure the safety, ease and needs of all users; and*
  - viii. *Adequately mitigate any impact on local public access routes.”*
- 8.7.2. Furthermore, Policy 13 c) and f) requires proposals of this scale to provide a transport assessment and travel plan.
- 8.7.3. As set out in the assessment of principle, Policy 30 of NPF4 requires accessibility for disabled people, opportunities for sustainable travel and opportunities for access to the natural environment to be taken into account.
- 8.7.4. Transport Policies 2 and 3 of the LDP largely reflect the requirements set out above and additionally require the design and specification of the infrastructure to be in conformity with the standards of the relevant roads authority. In this case, the A82 trunk road is the responsibility of Transport Scotland and the internal roads and parking for the proposed site are the responsibility of Argyll and Bute Council Roads Authority.

### Assessment

- 8.7.5. The applicant has provided a Transport Assessment, Road Safety Audit and Active Travel Plan with their application alongside detailed drawings of the proposed trunk road access junction and parking provision on site.
- 8.7.6. It is proposed to close off the westernmost access on the A83 and utilise the existing eastern access. This would require upgrading to create a ghost island junction within the trunk road for those turning right into the site. The existing internal roads through the site would be used and upgraded as necessary. Car parking is proposed for each individual development type and additional visitor parking would be formed north of the pier. EV charging stations would be erected.
- 8.7.7. A network of paths would be constructed around the site. There is an existing pedestrian walkway long the trunk road which connects Arrochar and Succoth to the site. It is proposed to have a coach/bus stop area in front of the bunkhouse and to have secure bike racks.
- 8.7.8. It is predicted that the development would result in 635 bi-directional vehicular trips per day at a worst-case peak season scenario. The development traffic is forecast to have an 8% peak hour impact on the A83 to the west of the site and a 27% impact to the west.
- 8.7.9. The applicants Transport Assessment and Active Travel Plan suggest several measures to encourage sustainable transport to and from the

development site including a shuttle bus, bike hire service, cycle lane provision and marketing/promotion measures of sustainable alternatives.

- 8.7.10. Argyll and Bute Council Roads Officers are content with the proposed development layout and parking and have recommended conditions to ensure conformity with their standards.
- 8.7.11. For the trunk road access, the applicant was unable to meet the required visibility sightlines for the development and Transport Scotland requested that they apply directly to them for a 'departure from standard.' Through this process further departures were identified, and Transport Scotland have agreed to the design of the proposed road junction subject to a number of conditions.
- 8.7.12. The active travel measures suggested by the applicant are welcomed and could contribute strongly to the site meeting sustainable transport requirements. However, the documents provided are not strongly worded and do not commit to any particular measure being carried out. For this reason, a condition is recommended to secure an active travel plan in advance of the development which explicitly commits to measures designed to reduce dependence on private car travel and encourage alternative modes of transport.
- 8.7.13. The design of the pedestrian path network to meet accessibility standards should also be secured through the overall landscaping scheme condition.
- 8.7.14. Subject to these conditions, the proposed development meets the relevant roads authority standards and complies with sustainable transport policies.

## **8.8. Landscape**

### Policy Background

- 8.8.1. Policy 4 of NPF4 supports development which affects a National Park where the objectives of the designation and the overall integrity of the area will not be compromised; or any significant adverse effects on the qualities of the area are clearly outweighed by social, environmental or economic benefits of national importance. The Special Landscape Qualities (SLQs) of the National Park are protected under Natural Environment Policy 1 of the LDP with development proposals required to be sympathetic to their setting and minimise visual impact.
- 8.8.2. Overarching Policy 1 of the LDP sets out that proposals must relate well to the landscape context and setting, respecting important historical, cultural and landscape features of the site and the surrounding area. This is added to by Overarching Policy 2 which requires development proposals to safeguard visual amenity and important views whilst protecting and enhancing landscape character.

## Assessment

- 8.8.3. The applicant's assessment has been reviewed by the National Park Authority's Landscape Advisor, and their advice has been incorporated into this assessment.
- 8.8.4. The LVIA submitted has not consistently followed best practice for the scale of the proposed development and its location within a highly sensitive area. However, it is judged that the LVIA provided is sufficient, alongside site sections and artist impressions, to undertake an assessment of the landscape and visual impacts of the proposed development at this stage.
- 8.8.5. The following embedded mitigation measures are taken into account throughout the assessment:
- Retention, as far as practicable, of existing vegetation, with a vegetated buffer to the A83 and retention of the riparian vegetation along the Allt a' Bhalachain.
  - Use of existing hardstanding and access roads.
  - Work with the landform and topography of the site to minimise earthworks.
- 8.8.6. The Zone of Theoretical Visibility (ZTV) provided by the applicant demonstrates that visibility would be restricted to the upper reaches of Loch Long particularly on the south and west shores. Theoretical visibility is shown in purple in figure 13.
- 8.8.7. Key viewpoints are on the west side of the loch, from within Arrochar and Succoth and from the hillside path above Arrochar.
- 8.8.8. The existing visual baseline of the site is a woodland setting containing roads and dilapidated buildings/piers with the backdrop of the Arrochar Alps.
- 8.8.9. The proposed development will consist of the large bunkhouse building (up to 7 metres tall) with parking and public realm closest to the loch. Small scale glamping pods will be in the eastern woodland area. To the rear and upper levels of the site will be the holiday lodges and holiday home plots. The holiday lodges are principally one or two storey (3.4 metres tall) with 3no. two storey lodges (5.4 metres tall). The indicative design of the proposed dwellings is for three storeys (approx. 9.8 metres tall). The existing pier building is proposed for demolition, with some historical features (e.g. tramlines) being preserved.

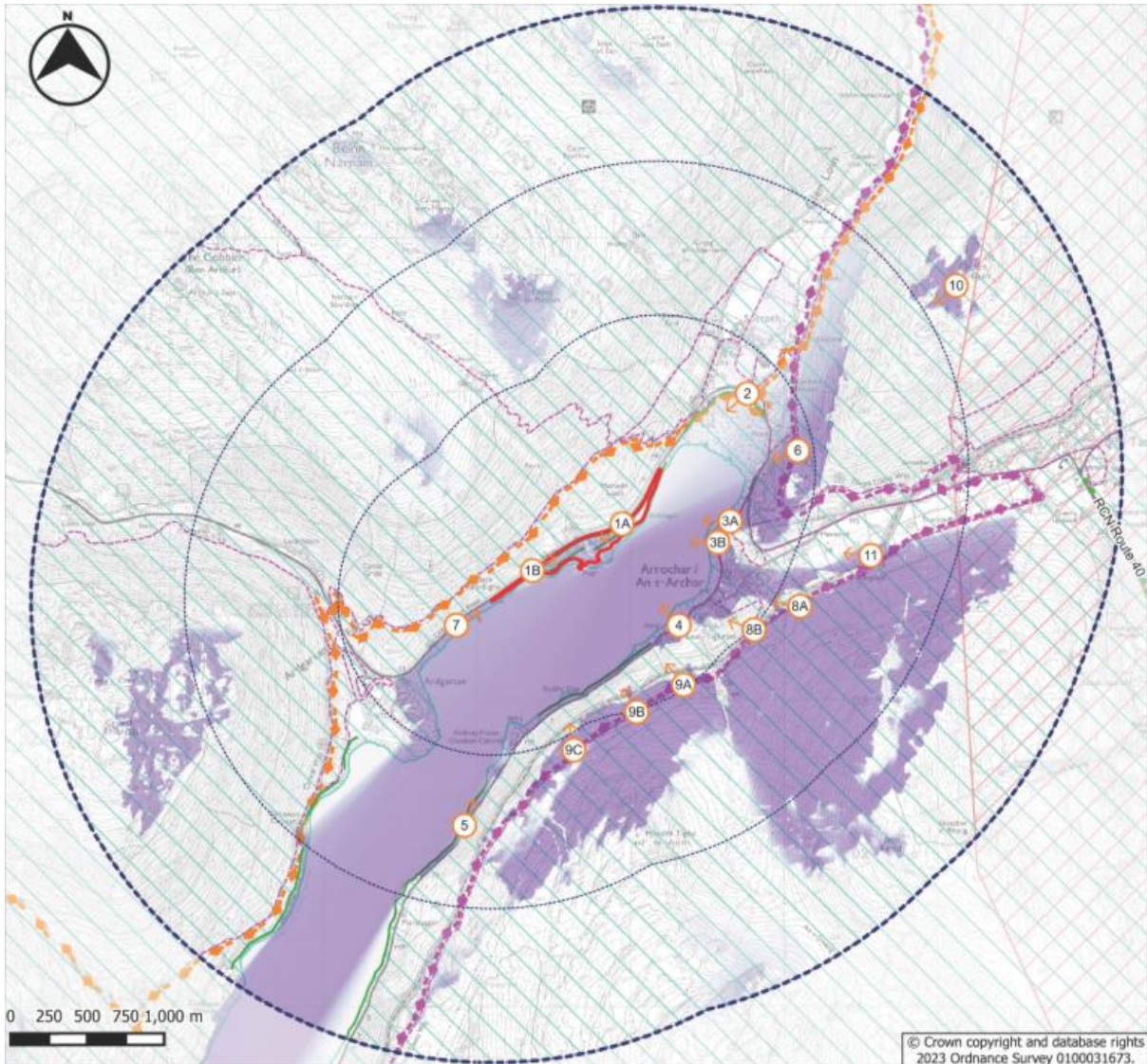


Figure 13 ZTV

8.8.10. Based on finished floor levels the holiday homes are likely to project up to 8 metres above the road level. The indicative design of the dwellings incorporates a black clad upper floor which would likely reduce the visibility. However, it is of concern that the holiday homes could become a dominant feature of the site and within the landscape due to their proposed height and spread. By contrast, the bunkhouse building, which would be the ‘heart’ of the development, is not as tall and is contained within the lower reaches of the site. It would have been beneficial for the applicant to have provided photomontages of the development to have assessed the massing and scale of the development. However, given that it is proposed to sell the holiday home plots on for self-build, and that they would be subject to a design brief, it is considered reasonable at this stage to allow the scale and massing of those buildings to be agreed later through condition.

- 8.8.11. The applicants LVIA concludes that, for visual amenity, landscape character and the Special Landscape Qualities (SLQs), there will be a significant and adverse impact during the construction stage, lessening to non-significant by year 15 of operation.
- 8.8.12. Although the National Park landscape advisor disagrees with part of the applicant's assessment in terms of the rarity and value of the site, they broadly agree with the conclusions on significance of impact. The presence of construction machinery, buildings, removal of vegetation, lighting and increased activity on the site will have significant and adverse effects during the construction period.
- 8.8.13. However, the site's lower susceptibility to change—given its derelict, previously developed nature— alongside the proposed compensatory planting, means long-term landscape impacts will be non-significant. This conclusion is also based on the proposed development pattern echoing the sparse development pattern that exists already within Loch Long.
- 8.8.14. Alongside the embedded mitigation, several mitigation measures are identified which would reduce the impact during construction and further reduce the magnitude of change, creating a beneficial effect during operation.
- 8.8.15. A comprehensive landscape plan, including the proposed compensatory planting and biodiversity enhancement measures, will enhance the landscape, visual amenity and biodiversity of the site. Subject to this plan and the design of the development being assessed as appropriate in section 8.9 below, the proposed development would retain the scenic and tranquil qualities of the loch environment.
- 8.8.16. A design brief/code for the holiday homes is required to be secured through condition for the proposed dwellinghouses. Photomontages will be provided through this condition to agree the size and scale of these buildings. This will ensure that they will not dominate the landscape and can be well integrated into the site as a whole.
- 8.8.17. To minimise the impacts over time, and whilst the proposed works are phased, trees should also be removed in phases to provide maximum screening of the development during construction. The phasing of tree removal can be agreed through the phasing plan proposed in paragraph 8.2.17. A construction lighting and traffic plan should also be required as part of a Construction Environmental Management Plan to reduce the impacts from construction activities.
- 8.8.18. To protect visual amenity during operation an external lighting plan should be secured via condition. This will ensure that the lighting of the overall site shall not contribute to light pollution nor have an adverse impact on amenity.
- 8.8.19. The above recommended conditions will ensure the objectives and overall integrity of the National Park are not compromised and will ensure

the development is sympathetic to the setting whilst minimise visual impact in accordance with NPF4 Policy 4.

## **8.9. Sustainable Design and Amenity**

### Policy Background

- 8.9.1. Overarching Policy 1 of the LDP requires development to contribute to the National Park being a low carbon place by reusing brownfield land where possible, reducing greenhouse gas emissions through sustainable design, using energy efficient materials and using an ecosystem approach.
- 8.9.2. Furthermore, to achieve a natural, resilient place, proposals should relate well to the landscape context and setting, being sympathetic to built forms and materials. Important historical and cultural features of the site should be respected, and appropriate soft and hard landscaping should be incorporated.
- 8.9.3. Overarching Policy 2 of the LDP requires all proposals to achieve a high-quality design and layout, providing a positive sense of place and complimenting local distinctiveness. All proposals should incorporate climate friendly design, reducing greenhouse gas emissions by minimising overall energy requirements and by incorporating low and zero carbon technologies.
- 8.9.4. The National Parks Design and Placemaking Guidance provides detailed advice on an ecosystem approach (siting and designing to minimise energy requirements) and on the expected design quality of holiday developments. Notably, new holiday park developments should be size appropriate, with aesthetic internal layouts, including natural communal areas and play areas. They should be sited well within the landscape, utilising natural screening. They should have limited infrastructure to avoid a residential feel and have natural/designed landscape between individual units.
- 8.9.5. Under Policy 2 of NPF4 development proposals are required to be sited and designed to a) minimize lifecycle greenhouse gas emissions and b) adapt to risks from climate change.
- 8.9.6. Development proposals are required to be designed to improve the quality of an area under Policy 14. Proposals must also be consistent with the six qualities of successful places: healthy, pleasant, connected, distinctive, sustainable and adaptable.
- 8.9.7. Policy 12 (Zero Waste) requires development to reduce waste, supports the reuse of existing buildings and infrastructure and requires the management of waste during operation.

## Assessment

- 8.9.8. The proposed development consists of multiple elements each with their own design requirements and therefore each element will be assessed individually before the site is considered as a whole.

### *Bunkhouse*

- 8.9.9. The proposed bunkhouse design is influenced by the form and massing of previous industrial buildings on the site which were simple pitched roof warehouses. It has an oblong footprint and comprises a larger A-frame building with glass corridor links to two A-frame buildings sited perpendicular to the main building. These connected buildings have a smaller footprint but a higher ridge height to the main building. The materials proposed are timber, black metal and concrete.
- 8.9.10. The design of this building is of a high quality, using a simple material palette and form. The reflection of the historical use of the site in its shape and massing is welcomed. The size and scale of the building is appropriate and its central location within the development will create a natural hub.

### *Holiday Lodges*

- 8.9.11. The proposed holiday lodges have simple A-frame shapes with horizontal timber cladding and slate roofs. They have small decking areas which provide defensible outdoor space for visitors.
- 8.9.12. The National Park Design and Placemaking Guidance sets out that holiday development should not be regimented, not having the same orientation and being too closely spaced.
- 8.9.13. Although there is some variety in the layout of the holiday lodges, they are mainly facing the same direction and set out in regimented rows which would not ordinarily be supported by policy and guidance. However, there is capacity in this area for improvement, which can be achieved through the landscape and tree planting plan. The tree planting can increase the sense of privacy between units, and they can be micro-sited in a way to have the development pattern less regimented.

### *Holiday Homes*

- 8.9.14. An indicative design has been provided for the proposed holiday homes which shows them to be 3 storeys tall with large, glazed areas and recessed double height balconies. Materials proposed are stone, timber and black metal. The black metal roof material would fold over the building and form part of the cladding.
- 8.9.15. There is some concern, as expressed in section 8.8 above, that the scale and massing of these holiday homes would be too big and could be visually dominant within and outwith the site. The proposed black clad 3<sup>rd</sup>

storey would contribute somewhat to reducing the visibility of the buildings, providing there is a wooded backdrop.

- 8.9.16. Given that the proposal is an indicative design and that they will be self-build plots subject to a design code, it is considered acceptable to approve the principle of development at this stage. Conditions should secure a design code for the buildings which would require the submission of photomontages of the proposed holiday homes in the context of the development. The design code should set out the massing, size, materiality and siting of the proposed holiday homes to ensure that each building would integrate with each other and the development as a whole.
- 8.9.17. The holiday homes would be classified as dwellings, albeit with occupancy restricted by condition, and they would benefit from permitted development rights for extensions, outdoor buildings and other matters. A condition is proposed to remove permitted development rights for the holiday homes to control their scale, and incidental development, and to retain future cohesion in their appearance. This would be reinforced in the Section 75 legal agreement for the avoidance of doubt for individual owners and successors in title. This would also govern future management and maintenance of the associated communal grounds.

#### *Campervan Pitches and Glamping Pods*

- 8.9.18. The proposed glamping pods are simple pitched roof pods with one room for living/sleeping. Toilets and showers will be provided next to the parking in a timber clad unit. They would be a timber construction with dark grey roof shingles.
- 8.9.19. The proposed pods are well sited within the northeast woodland of the site, with differing orientations and distanced siting, all connected by an access path.
- 8.9.20. The proposed campervan pitches are appropriately located within the car park for the camping pods and there is a 10-metre-wide buffer between the spaces and the loch shore.

#### *Pier and public space.*

- 8.9.21. It is proposed for the steel structures to be removed from the pier and that ground level historical features, such as the tram lines, could be preserved. This would be supported and the pier could become a public space. It is recommended that a condition be attached requiring the applicant to carry out a structural survey to determine how much of the pier and structures could reasonably be preserved.
- 8.9.22. There are no proposals for any moorings, and the use of the existing structures is welcomed.

- 8.9.23. There is a proposed integrated natural outdoor play space and further information would be required to demonstrate how this would be constructed and operated with minimum impact on the natural environment. Overall, a naturally designed play space is welcomed and would be a positive facility for the whole development.

### *Overall Design*

- 8.9.24. The proposed buildings match each other tonally, using a limited material palette of black metal, slate, timber and black windows and doors. This creates cohesion across the development proposal.
- 8.9.25. The site requires a comprehensive landscaping scheme which would incorporate the on-site compensatory planting. Path networks and, to some extent, the lodges and camping pods, should be micro sited to avoid removing more existing vegetation than required and to try and reduce the regimented pattern of development. Significant native woodland planting throughout the site would create a pleasant, healthy and sustainable environment, with a natural sound and visual buffer.
- 8.9.26. It is recommended that this landscaping scheme is secured by condition. In addition, lighting and signage schemes will be required to ensure a unified approach throughout the development. As part of the signage scheme, the applicant should provide for information boards relating to the history of the site.
- 8.9.27. The applicant proposes to use air source heat pumps for the heating of the buildings, this would ensure the proposal meets the requirement of Overarching Policy 2 to use zero/low carbon technologies. Furthermore, this would contribute to the proposal meeting NPF4 Policy 2 to minimise carbon emissions. A condition is required to secure the use of air source heat pumps (or any other suitable technology) and to require further detail on their siting and appearance prior to development commencing.
- 8.9.28. Regarding accessibility, the applicant has provided that 10% of the lodge and camping pod accommodation shall be constructed to accessible standards and has included the required accessible parking. Accessible rooms would also be available in the bunkhouse. As part of the proposed landscaping scheme, consideration should be given to the accessibility of the internal path networks and making as much of the site as possible, open to users of all abilities.
- 8.9.29. Overall, the design of the proposal is acceptable, providing a high-quality development which will bring a long derelict site into positive use. Conditions will secure the sustainability and accessibility of the site whilst creating a healthy, pleasant, connected and distinctive visitor experience.

## **8.10. Contaminated Land**

### Policy Background

- 8.10.1. Policy 9 of NPF4 requires developers to demonstrate that land which is suspected of contamination can be made safe and suitable for the proposed use.
- 8.10.2. Under the LDP Natural Environment Policy 16 requires applicants to provide a risk assessment for contaminated land to demonstrate that impacts on human health and the wider environment, including the water environment, have been considered and addressed. The site should be remediated and made suitable for use.

### Assessment

- 8.10.3. At the scoping stage, Argyll and Bute Council Environmental Health considered that a suspensive condition, requiring land contamination to be assessed and remediated, would be an appropriate route for the proposed development outwith the EIA process. There are no known studies of the contamination status of the site however it is noted that there is construction waste which may contain asbestos but this would require to be dealt with under best practice and waste management legislation. The probability of significant environmental effects arising from land contamination was considered to be low.
- 8.10.4. That being said, the applicants EIAR chapter on Hydrology raises the potential for the (removal and) disruption of the land to carry the risk of harmful substances entering the surrounding water bodies. They judge there to be a potential major adverse effect from the proposed development prior to the implementation of mitigation measures.
- 8.10.5. To mediate this risk, and in line with the recommendation from Argyll and Bute Council Environmental Health, it is recommended that the application is subject to a Contamination Land Assessment. Additionally, an Environmental Clerk of Works is recommended to be secured by condition to ensure the proposed development is monitored and mitigation measures are adhered to.
- 8.10.6. Subject to the above recommended conditions the residual impacts of the development on water quality are judged to be negligible and not significant.

## **8.11. Archaeology**

### Policy Background

- 8.11.1. Historic Environment Policy 7 of the LDP requires archaeological features to be preserved in-situ and in an appropriate setting, wherever feasible. Where this is not possible, planning approval should be conditional on the developer making appropriate provision for the

excavation, recording and analysis of any archaeological remains which may be found.

### Assessment

- 8.11.2. As described above, the proposed development is on the site of a former torpedo testing range and there are many above ground remnants of this use including the pier, pier buildings, and ground level debris. Historical mapping, Roy's Military Survey of Scotland (1747-55), shows an old military road (on roughly the same line of the existing internal road within the site) and an unnamed medieval or later rural settlement situated immediately southwest of the Allt a' Bhalachain.
- 8.11.3. The West of Scotland Archaeology Service have advised that a condition is required to secure a written scheme of investigation prior to works commencing. This would require the development to undertake fieldwork to survey the remaining structures on the land and to implement a programme of archaeological trial trenching to establish whether sub-surface material from earlier phases of occupation are surviving.
- 8.11.4. It is therefore recommended that the written scheme of investigation is required by condition to ensure that the proposed development complied with Historic Environment Policy 7 of the LDP.

### **8.12.Engagement with the Planning Application**

- 8.12.1. It is of note, that for a large-scale major application, there have been no representations from members of the public and no consultation response from the Community Council. There is however strong support for the development of the site in general within the Local Place Plan.
- 8.12.2. It appears from the applicants Pre-Application Consultation (PAC) Report that they received good attendance and engagement to their public events and that they have taken account of feedback into their designs.
- 8.12.3. The single representation, from The Friends of Loch Lomond and the Trossachs raised several points which have been addressed in the assessment above. They also requested that the permission, if granted, be conditional on regular contributions from the applicant to a fund for natural capital. There is not a current planning policy reason to require contributions from the applicant, however, it is open to the applicant to do so voluntarily. That being said, there are improvements to natural capital, (or biodiversity), as set out in section 8.4, which would be achieved through the granting of this consent.

## 9. Conclusion

- 9.1. The proposed development of this site will bring a long-standing derelict site into positive use, directly meeting the aims of the community as set out in their Local Place Plan and delivering significant public benefits. It will deliver an increase in visitor facilities and accommodation in a popular area, including safe community and public access to nature through a revitalised pier and a natural play park. Biodiversity, including nature networks, will be significantly improved through the removal of invasive species and extensive native planting.
- 9.2. The development is supported as it aligns with the site's LDP allocation for visitor experience and meets the relevant policy requirements of NPF4 and the Local Development Plan across key topics including biodiversity, woodland, flood risk, transport, landscape, sustainable design and archaeology.
- 9.3. The proposed loss of woodland is judged acceptable given the significant public benefits of the redevelopment of this site and will be fully mitigated through on and offsite compensatory planting. Ecological impacts can be managed or mitigated through the conditioning of a Construction Environmental Management Plan, species protection plans, invasive species removal, biodiversity enhancement measures, and long term habitat management.
- 9.4. Flood risk can be safely managed through identified mitigation measures, including minimum finished floor levels, infrastructure upgrades and drainage design, with private water supply and wastewater arrangements secured through further assessment and SEPA authorisation.
- 9.5. Access and parking are considered acceptable, with conditions required for junction upgrades, internal road design and an active travel plan to support sustainable transport. In the long term, the landscape character and appearance will be protected and enhanced through a robust landscape scheme and design code for the holiday homes.
- 9.6. Subject to all these required conditions along with a Section 75 agreement covering matters such as phasing, management of common areas and compensatory planting, the development is assessed as compliant with the Development Plan as a whole and is therefore recommended for approval.

## Appendix 1 Conditions and Informatives

1. **Duration of Permission:** This permission lapses on the expiration of 3 years beginning from the date of this permission unless the development to which this permission relates is begun before that expiration.

REASON: In accordance with section 58 of the Town and Country Planning (Scotland) Act 1997 (as amended).

### OVERALL SITE

2. **Written Scheme of Investigation:** No development shall take place within the development site as outlined in red on the approved plan until the developer has secured the implementation of a programme of archaeological works in accordance with a written scheme of investigation which has been submitted by the applicant, agreed by the West of Scotland Archaeology Service, and approved by the Planning Authority. Thereafter the developer shall ensure that the programme of archaeological works is fully implemented and that all recording and recovery of archaeological resources within the development site is undertaken to the satisfaction of the Planning Authority in agreement with the West of Scotland Archaeology Service.

REASON: In accordance with Historic Environment Policy 7 of the LDP to ensure that, where present, non-designated historic environment assets are excavated, recorded and analysed.

3. **Land Contamination:** Unless otherwise agreed in writing and in advance by the Planning Authority, prior to any development commencing on site, a scheme will be submitted by the Developer (at their expense) to identify and assess potential contamination on site. No construction work shall commence until the scheme has been submitted to, and approved, by the Planning Authority, and is thereafter implemented in accordance with the scheme so approved.

The scheme shall be undertaken by a competent person or persons in accordance with relevant authoritative guidance including PAN 33 (2000) and BS10175:2011 or, in the event of these being superseded or supplemented, the most up-to-date version(s) of any subsequent revision(s) of, and/or supplement(s) to, these documents. This scheme should contain details of proposals to investigate and remediate potential contamination to the satisfaction of the Planning Authority, and must include:-

- a. A desk study and development of a conceptual site model including (where necessary) a detailed site investigation strategy. The desk study and the scope and method of recommended further investigations shall be agreed with the Council prior to addressing parts b, c, and d of this condition.

Should the desk study show the need for further assessment this will be undertaken in the following sequence:

- b. A detailed investigation of the nature and extent of contamination on site, and assessment of the risks such contamination presents.
- c. Development and agreement of a remedial strategy (if required) to treat/remove contamination ensuring the site is made suitable for its proposed use (this shall include a method statement, programme of works, and proposed verification plan).
- d. Submission of a verification report for any agreed remedial actions detailing and evidencing the completion of these works.

Written confirmation from the Planning Authority, that the scheme has been implemented and completed shall be required by the Developer before any development hereby approved commences. Where remedial measures are required as part of the development construction detail, commencement must be agreed in writing with the Planning Authority.

REASON: To ensure that the potential risks to human health, the water environment, property, and, ecological systems arising from any identified land contamination have been adequately addressed

4. **Wastewater Drainage/Sustainable Urban Drainage Scheme (SuDS):** Prior to the commencement of development the applicant shall apply for and receive authorisation from SEPA under Environmental Authorisations (Scotland) Regulations 2018 for all proposed wastewater and surface water treatment on site. Details of the approved scheme shall be provided to the Planning Authority prior to development commencing.

REASON: To ensure that the drainage to be implemented on site does not have an adverse impact on shellfish waters and to ensure that the final drainage design, which is fundamental to the overall development, is in place prior to the commencement of development.

5. **Local Air Quality:** Prior to development commencing a report providing an assessment of the proposed development's impact on Local Air Quality Objectives should be submitted and approved by the Planning Authority. The report shall include details of the potential impacts on local air quality of emissions including emissions from road traffic and other vehicles, and from any centralised boiler or combustion plant. Assessment of such combustion plant impact should include boiler capacity, emissions, and efficiency, the type, handling and consumption of fuel, and flue discharge height.

REASON: To ensure protection of local air quality.

6. **Private Water Supply:** No development shall commence until an appraisal of the wholesomeness and sufficiency of the intended private water supply and the system required to serve the development has been submitted to and approved by the Planning Authority in consultation with Argyll and Bute Council Environmental Health Department.

The appraisal shall be carried out by a qualified hydrologist/hydrogeologist or other suitably competent person and shall include a risk assessment having regard to the requirements of Schedule 4 of the Private Water Supplies (Scotland) Regulations 2006 or Part 3 of the Water Intended for Human Consumption (Private Supplies) (Scotland) Regulations 2017 (as appropriate) 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 development shall not be brought into use or occupied until the required water supply system has been installed in accordance with the agreed specification and is operational.

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.

7. **Evaluation of structures on Allt a’Bhalachain:** Prior to the commencement of development a further detailed structural and geotechnical assessment of the structures on the Allt a’Bhalachain watercourse, including the bridges and concrete bridge deck, shall be provided to and approved in writing by the Planning Authority in consultation with Local Flood Officers and SEPA. The assessment shall detail the existing condition of the bank and structures, confirm which structures are suitable for retention and detail any proposed changes to ensure flood water can be conveyed downstream without out of bank flooding.

REASON: To secure mitigation measures against flooding to ensure the proposed development will have a non-significant impact.

8. **Hydromorphological Mitigation:** Prior to the commencement of development a hydromorphological assessment shall be submitted to and approved in writing by the Planning Authority in consultation with Local Flood Officers and SEPA. The assessment shall detail suitable bed and bank protection to protect the channel from future movement and erosion. The assessment should also assess the risk of coastal erosion. Any mitigation measures identified by the assessment shall thereafter be implemented in full in a timescale to be agreed in writing with the Planning Authority.

REASON: To maintain the level of flood risk as assessed in the flood risk assessment.

9. **Construction and Environmental Management Plan (CEMP):** Prior to the Commencement of Development, a Construction and Environmental Management Plan shall be submitted to, and approved in writing by, the Planning Authority. The CEMP shall detail the entire construction process including the removal of any contaminated land and shall set out the following matters in particular:
- a) Detailed construction methods and timings relating to the phasing of the works, including the phasing of tree removals;
  - b) Method of working and mitigation measures to control pollution control, dust and vibration/ measures to control the emission of dust and dirt during construction;
  - c) Method of controlling pollution and sediment release to the water environment including Loch Long and the water course running through the site known as Allt a' Bhalachain;
  - d) Method of controlling surface water during construction;
  - e) The location of the site compound and the parking area for vehicles of site operatives and visitors and loading and unloading of plant and materials
  - f) Details of all ecological, tree and landscape mitigation measures that must be complied with by site operatives;
  - g) The location of the storage area for plant and materials used in constructing the development;
  - h) Details of any lighting to be used;
  - i) Details of wheel washing facilities for vehicles joining the public road;
  - j) Contact details of the Ecological Clerk of Works;
  - k) Construction timetable;

Thereafter, the approved Construction and Environmental Management Plan shall be complied with and implemented as part of the proposed Development unless revised to secure an equivalent or higher standard of protection/restoration with the prior written consent of the Planning Authority.

REASON: To mitigate the impact of the proposed development on the surrounding environment and to ensure a non-significant impact on landscape, ecology and hydrology during the construction phase.

10. **Ecological Clerks of Works (ECoW):** Prior to the commencement of construction works within the development site, an appropriately qualified ecologist shall be

appointed as an Ecological Clerks of Works by the developer to oversee the implementation of the development and to ensure relevant legislation, conditions and mitigation measures are followed. Confirmation of the appointment, qualifications and contact name and details shall be submitted to the planning authority prior to commencement of development. Within 2 weeks of the appointment a detailed planned work programme including site visits and reporting to the developer and the Planning Authority shall be submitted to and approved by the planning authority.

REASON: To ensure construction works are undertaken in a manner that complies with the planning conditions and safeguards ecological species and habitats on the site.

11. **Construction Traffic Management Plan:** Prior to commencement of the development, a Construction Traffic Management Plan (CTMP) shall be submitted to, and approved by, the Planning Authority, after consultation with Transport Scotland. In particular, the CTMP shall identify measures to control the use of any direct access onto the A83 trunk road. Thereafter, all construction traffic associated with the development shall conform to the requirements of the agreed CTMP.

REASON: To mitigate the adverse impact of construction traffic on the safe and efficient operation of the trunk road network.

12. **Trunk Road Vehicle Barriers:** Prior to commencement of the development, a further assessment of the requirement for vehicle barrier provision (such as a vehicle restraint system) along the trunk road boundary, shall be submitted to, and approved by, the Planning Authority, after consultation with Transport Scotland. The approved scheme will thereafter be implemented, prior to commencement of the development.

REASON: To ensure appropriate safety barrier provision is provided to protect trunk road drivers from the risks presented by roadside dangers.

13. **Protected Species:** Prior to the commencement of the development hereby permitted a detailed survey for protected species, including bats, otters, red squirrels, badgers, reptiles and amphibians shall be undertaken and the results, together with any identified mitigation measures, including, where necessary, Species Protection Plans, shall be submitted to, and approved in writing by, the Planning Authority. The identified mitigation measures and species protection plans shall thereafter be fully incorporated into the Construction and Environmental Management Plan and implemented in full throughout the construction of the development.

REASON: The applicant has established the presence of protected species and likely appropriate mitigation suitable for the assessment of this application. However, as the survey was carried out in 2022, a full revised survey will be required to reestablish the base line of the site and to ensure that any changes are taken into account prior to the construction of the development.

14. **Birds:** No trees or buildings shall be removed during the main bird breeding season (March – August inclusive) unless a walk over survey for nesting birds is undertaken, details of the survey shall be submitted and approved by the Planning Authority prior to undertaking the clearance works. In addition, a protection plan for the intertidal area shall be submitted to an approved in writing by the Planning Authority to protect shoreline and intertidal birds.

REASON: To ensure an illegal action does not take place contravening the Wildlife and Countryside Act 1981 (as amended).

15. **Invasive Non-Native Species Management Plan:** Prior to commencement of the development hereby permitted, full details of a scheme for the eradication of the Invasive Non- Natives species included within Volume 3, Technical appendix 6.2 Invasive Non-Species, of the EIAR and Buddleja Davidii, shall be submitted to, and approved in writing by, the Planning Authority. The scheme shall include a timetable for implementation and clearly identify the extent of all INN's on a scaled plan. A validation report confirming the remediation treatment has been carried out and that the site is free of non-native invasives shall be submitted to and approved in writing by the Planning Authority.

REASON: To eradicate Invasive Non-Natives from the development site, to prevent the spread of the plant through development works.

16. **Details of Landscaping:** Prior to the commencement of the development hereby permitted, a comprehensive landscaping scheme with plans shall be submitted and approved in writing by the Planning Authority in consultation with Transport Scotland. The said scheme shall include:
- a) proposed finished levels or contours;
  - b) any new hardstanding in access and car parking surfacing materials, pedestrian areas/paths;
  - c) any new walls, fences, hedges, gates;
  - d) any minor structures (e.g. furniture, play equipment, refuse or other storage units);
  - e) details of the natural outdoor playspace;
  - f) existing trees and hedgerows to be integrated into the scheme;
  - g) retained historic landscape features and proposals for restoration;
  - h) planting plans and written specifications (including cultivation and other operations associated with plant and grass establishment), schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate;
  - i) the total level of compensatory native woodland planting expressed in ha and shown on plans,
  - j) details of the landscaping treatment along the trunk road boundary, which shall be located such that it can be installed and maintained from within the development without requiring access to the trunk road;
  - k) details of the fencing / barrier proposals along the trunk road boundary which shall be located such that they can be erected and maintained from within the development without requiring access to the trunk road; and
  - l) a programme of implementation.

Thereafter, the approved landscaping scheme shall be implemented in full. Any trees or plants, to be planted in accordance with the approved landscape scheme, which die, are removed or become seriously damaged or diseased, within a period of 5 years from the date of their planting, shall be replaced in the next planting season with others of similar sizes and species unless the Planning Authority gives written approval to any variation.

REASON: The proposed development and its location requires landscaping to fully integrate the proposal with its surroundings. Without such landscaping the proposal would be considered contrary to the provisions of the development plan. To ensure that there will be no distraction to drivers on the Trunk Road, and that the safety of the traffic on the Trunk Road will not be diminished. To minimise the risk of pedestrians and animals gaining uncontrolled access to the trunk road, with the consequential risk of accidents.

17. **Biodiversity Enhancement:** Prior to the commencement of the development hereby permitted, a detailed scheme for the enhancement of biodiversity within the development site, based on the Outline Biodiversity Enhancement and Habitat Management Plan, shall be submitted to, and approved in writing by, the Planning Authority. This scheme shall then be implemented in full in a timescale to be agreed in writing with the Planning Authority.

REASON: To secure biodiversity enhancement as required under adopted local development plan Natural Environment Policy 6: Enhancing Biodiversity.

18. **External Lighting:** Prior to the commencement of the development an external lighting plan shall be produced with a lighting management strategy. Details of design and any positioning of any outdoor lights should be submitted and approved by the Planning Authority after consultation with Transport Scotland prior to their installation

REASON: In order to minimise the effect of light pollution in the interests of the amenity of the area and protect the quality of the dark skies. To ensure that there will be no distraction or dazzle to drivers on the Trunk Road, and that the safety of the traffic on the Trunk Road will not be diminished.

19. **On-Site Compensatory Tree Planting:** Prior to commencement of the development, a tree planting plan – to include location, area, stocking density, species, quantity, proportion, seed zone, tree type and size, ground preparation, planting method, mammal protection, maintenance and schedule – shall be submitted to, and approved in writing by, the Planning Authority. The area to be planted shall be 1ha or greater. The tree/trees shall be planted on site in accordance with the approved details, in the first available planting season. Any tree that within a period of five years after planting, dies or, in the opinion of the Planning Authority, becomes seriously damaged or defective shall be replaced with another of the same

species and size as originally approved in a timetable to be approved in writing with the Planning Authority.

REASON: To compensate for the loss of the native woodland to be removed to accommodate the development.

20. **Zero Carbon technology:** The air source heat pumps as proposed, shall be installed prior to the first occupation of the development hereby approved. Further details, including revised elevation drawings, specification and noise assessment of the pumps shall be submitted and approved in writing by the Planning Authority, in consultation with Argyll and Bute Council Environmental Health, prior to installation. If there is a change to the technology, then this shall be first approved in writing by the Planning Authority.

REASON: To ensure the detailing and siting of the units do not cause adverse impact on the design, appearance and amenity of the development and to comply with Policy OP2 in relation to providing 20% of energy requirements from zero and low carbon technology.

21. **Internal Roads and Parking:** Prior to the commencement of the development hereby approved the following additional information shall be submitted and agreed in writing by the Planning Authority in consultation with Argyll and Bute Council Roads Authority:

- a) Details of the width of the access roads for the holiday lodges, which should be a width of 5.5 metres or a smaller width with passing places.
- b) An updated parking plan to show 52no. spaces for the holiday lodges.
- c) Updated Roads Layout drawings (references 24.0204-NAR-XX-XX-DR-C-9300 Rev P03, 24.0204-NAR-XX-XX-DR-C-9301 Rev P03, 24.0204-NAR-XX-XX-DR-C-9302 Rev P02) to reflect the development as approved

REASON: In the interests of road safety.

22. **Internal Roads:** The construction of the internal access roads shall comply with Argyll and Bute Council Roads Development Technical Guidance v1.7, or any subsequent revision, as follows:

- The access road junction's servicing the holiday lodges are to be constructed as per standard detail drawing SD08/002 REV. B
- The access road junction's servicing the house plots are to be constructed as per standard detail drawing SD08/002 REV. B
- Vehicle passing places shall be constructed in accordance with Standard Detail SD08/003 Rev B.

- All passing places shall be intervisible from a height of 1.05 metres above the carriageway and located at a distance no greater than 100m apart.

REASON: In the interests of road safety.

23. **Trunk Road Junction Upgrade:** Prior to the commencement of any part of the development hereby permitted, the new ghost island priority junction of the site access road with the A83(T), referred to as the 'west access' and generally as illustrated on the Narro Associates Drawing No. 24.0204-NAR-XX-XX-DR-C-9001 "Rev. P05 "Departure from Standards CD 109 Supporting Drawing", and also the Narro Associates Drawing No. 24.0204-NAR-XX-XX-DR-C-9002 "Rev. P04 "Departures from Standards CD 123 & CD 127 Supporting Drawings", shall be constructed to the satisfaction of the Planning Authority, after consultation with Transport Scotland.

REASON: To ensure that the standard of access layout complies with the current standards, and that the safety of the traffic on the trunk road is not diminished. The condition is required to be prior to the commencement as the applicant does not own all the land and may be required to obtain third party consent.

24. **Trunk Road Junction Closure:** Prior to the occupation of any part of the development hereby permitted, the former priority junction of the site access road with the A83(T), referred to as the 'east access', shall be stopped up, generally as illustrated on the Narro Associates Drawing No. 24.0204-NAR-XX-XX-DR-C9302 Rev. P01 "Proposed Roads Layout Sheet 3 of 3", to the satisfaction of the Planning Authority, after consultation with Transport Scotland.

REASON: To ensure that the standard of access layout complies with the current standards, and that the safety of the traffic on the trunk road is not diminished.

25. **Trunk Roads Drainage:** There shall be no drainage connections to the trunk road drainage system.

REASON: To ensure that the efficiency of the existing trunk road drainage network is not affected.

26. **Travel Plan:** Prior to the occupation of any part of the development hereby permitted, the Travel Plan received 19/12/2025 as appendix 02 of the Supporting Statement Addendum shall be updated to comply with the National Park Sustainable and Active Travel Guidance and shall include a timetable to implement identified measures against targets as well as monitoring and evaluation. Thereafter, the agreed Travel Plan shall be implemented in accordance with the timetable contained therein.

REASON: To comply with Transport Policy 2 of the LDP and Policy 13 of NPF4 to ensure the development encourages, promotes and facilitates walking, wheeling, cycling and public transport for everyday travel.

27. **Signage:** Prior to the installation of any signage, a signage plan shall be submitted to and agreed in writing with the planning authority. The signage plan shall include the location, dimension and design of signage to be installed on site. Thereafter, the signage shall be installed and maintained in accordance with the approved plan.

REASON: To achieve a high quality and consistent design across the site.

28. **Short Term Holiday Accommodation:** The bunkhouse, holiday lodges, campervan stances and glamping pods hereby approved, shall be used solely for short-term holiday use and not for permanent residential use. The unit(s) shall not be occupied by any one individual or group for a period exceeding 90 days in any one calendar year. A register of occupant's details (names and dates of stay) shall be kept and shall be made available to the National Park Authority on request.

[Note: This condition does not prohibit the letting of the units by a management company or other management arrangement on behalf of the owner]

REASON: The proposal has been assessed as a tourism development and the approval of permanent residence(s) would be contrary to the policies contained in the adopted local development plan.

### Holiday Homes

29. **Design Code:** Prior to the sale of any of the 14no. holiday home plots as shown on drawing no: 606-AP-400 Rev E a design code shall be agreed in writing with the Planning Authority. The design code shall include (but is not limited to) the following matters:
- A photomontage showing indicative massing of the holiday homes from viewpoint numbers 3B, 6, 7 and 9a as shown in Figure 7.1 Zone of theoretical visibility and viewpoints.
  - Limits on massing and form to support a unified design approach.
  - A material palette for all external materials to be used in the construction and completion of the dwellings.
  - A maximum footprint (expressed as percentage of site area) and number of storeys for each dwelling.
  - Any gates, fencing, hedging etc.

REASON: To ensure that the holiday homes are constructed with a coherent design strategy, which complements the overall development and promotes a unified design approach.

30. **Implementation of Design Code:** Prior to the commencement of construction of each individual dwelling hereby approved a site plan, floor plans and elevations shall be submitted and approved in writing by the Planning Authority. The proposed dwelling design shall accord with the Design Code agreed under condition 29. Thereafter, each dwelling shall be constructed in accordance with the approved design.

REASON: To ensure that the holiday homes are constructed with a coherent design strategy, which complements the overall development and promotes a unified design approach.

31. **Permitted Development:** Notwithstanding the provisions of Part 1 of Schedule 1 of the Town and Country Planning (General Permitted Development) (Scotland) Order 1992 (or any Order revoking or re-enacting that Order with or without modification) no material alterations or extensions shall be undertaken, nor shall any building or enclosure, hard surface, oil or gas storage tank, or satellite antenna provided within the curtilage of the holiday homes, without application to, and the grant of permission by, the Planning Authority.

REASON: The Planning Authority considers that such development should be subject to formal control in order to safeguard the amenities of the area.

#### Holiday Lodges

32. **Appearance of Lodges:** Prior to the construction of any holiday lodge hereby approved the final design and location of each unit, including decking and understorey, shall be provided and agreed in writing with the Planning Authority. This shall include plans, elevations, a site plan and specifications of materials. Thereafter, each unit shall be sited and constructed in accordance with the approved design and layout and maintained in perpetuity. Should a lodge require replacement in the future, the replacement lodge must conform to the approved design.

REASON: To ensure the appearance of the holiday lodges is appropriate to the overall site and to ensure that they are sited to minimise tree loss and avoiding a regimented layout.

#### Caravan Site and Glamping

33. **Caravan Units – Number:** The number of caravans hereby permitted shall not exceed 6 comprising 6 no. touring caravans. These 6 no. caravans shall be sited in accordance with the approved layout plan (ref: dwg. no. 606-AP-109 Rev D), unless

otherwise agreed in writing with the Planning Authority. For the avoidance of doubt, no caravan shall exceed the size restrictions set out in Part 1 of the Caravan Sites and Control of Development Act 1960 (namely: 20 metres (65.616 feet) in length; 6.8 metres (22.309 feet); and 3.05 metres (10.006 feet) internal floor to ceiling height), or any subsequent revision to the legislation relating to caravan size restrictions.

REASON: In order to achieve a satisfactory standard of development in the interests of the character and appearance of the site and the area and to ensure that the caravan sizes comply with the relevant legislation.

34. **Glamping Pods - appearance:** Prior to the siting of the 20 no. glamping pods hereby permitted a further detailed specification of the external appearance of the units shall be submitted and agreed in writing with the Planning Authority. Thereafter the glamping pods shall be retained in the approved appearance unless the Planning Authority agrees, in writing, to any variation.

REASON: For the avoidance of doubt and in order to achieve a satisfactory and consistent standard of development in the interests of the character and appearance of the site and the area.

#### Hotel

35. **Agreement of Materials and Specifications:** Prior to the commencement of construction of the bunkhouse on site, a further detailed specification of the undernoted proposed external finishing materials to be utilised on the building, including samples as indicated shall be submitted to, and agreed in writing by, the Planning Authority. Thereafter the specification and materials as may be approved in accordance with this condition shall thereafter be undertaken and used respectively in the completion of the project, prior to the proposed development being brought into use.

- a) The black corrugated metal to be used on the roofs;
- b) Manufacturers details of all windows, doors and glazed sections;
- c) The colour/treatment/finishes of all exposed timberwork;
- d) The details of the material and colour of rainwater goods, barge boards and fascias.

REASON: To ensure that the external appearance of the development complements the rural character of the area and the heritage of the site.

## INFORMATIVES

1. Notification of Initiation of Development - Under section 27A of the Town and Country Planning (Scotland) Act 1997 (as amended) the person undertaking the development is required to give the planning authority prior written notification of the date on which it is intended to commence the development. We recommend this is

submitted 2 weeks prior to the start of work. A failure to submit the notice, included in the decision pack, would constitute a breach of planning control under section 123(1) of that Act, which may result in enforcement action being taken.

2. Notification of Completion of Development - As soon as practicable after the development is complete, the person who completes the development is required by section 27B of the Town and Country Planning (Scotland) Act 1997 (as amended) to give written notice to the planning authority of the completion of the building works. As before, there is notice for you to complete for this purpose included in the decision pack. In larger, phased developments, a notice of completion is to be submitted as soon as practicable after each phase is finished by the person carrying out the development.
3. Display of Notice while development is carried out: The developer must, for the duration of the development, display a sign or signs containing certain information. A notice has been included in the decision pack. The notice must be displayed in a prominent place at or in the vicinity of the site of the development; readily visible to the public; and printed on durable material. It would constitute a breach of planning control not to display such a notice for this type of proposal.
4. SEPA Authorisation: Contact should be made with SEPA's local regulatory team regarding any proposals to undertake alterations to or works on the bank or bed of the watercourse as this may constitute an activity which requires to be authorised under Environmental Authorisations (Scotland) Regulations 2018. It should be noted that any and all work affecting the bank or bed of a watercourse must comply with the General Binding Rules of the above legislation. Details of regulatory requirements and good practice advice can be found on SEPA's website at [www.sepa.org.uk/planning.aspx](http://www.sepa.org.uk/planning.aspx). If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the regulatory team in your local SEPA office at:  
  
Balloch Office, Carrochan, Carrochan Road, Balloch G83 8EG (tel no. 01389 727770)
5. Short Term Lets: The applicant should note that properties used for short-term letting are regulated under The Civic Government (Scotland) Act 1982 (Licensing of Short-term Lets) Order 2022 and a Short Term Let Licence must be obtained from your local licensing authority.
6. Environmental Health:
  1. Regulatory requirements for private water supplies should be discussed with the Council's Environmental Health Service in the first instance.
  2. If the development is likely to use 10m<sup>3</sup> water per day then the applicant will need to apply for a registration or licence for water abstraction from SEPA

<https://www.sepa.org.uk/regulations/authorisations-and-permits/application-forms/#Water>

3. If the proposed development is a commercial undertaking including but not limited to; use as a holiday or long term private let, workplace, food business, campsite etc. then the applicant must apply to the Environmental Health service 8 weeks before the intended use date for the private water supply to be registered and certified as fit for use. Email: [pws@argyll-bute.gov.uk](mailto:pws@argyll-bute.gov.uk)
  4. It is recommended that should planning permission be granted, that the applicant contact Argyll and Bute Council Environmental Health Service to discuss further the measures needed to comply with the requirements of Water Intended for Human Consumption (Private Supplies) (Scotland) Regulations 2017 or the Private Water Supplies (Scotland) Regulations 2006, as is applicable.
7. Trunk Roads:

The applicant should be informed that the granting of planning consent does not carry with it the right to carry out works within the trunk road boundary and that permission must be granted by Transport Scotland Roads Directorate. Where any works are required on the trunk road, contact details are provided on Transport Scotland's response to the planning authority which is available on the Council's planning portal.

Trunk Road modification works shall, in all respects, comply with the Design Manual for Roads and Bridges and the Specification for Highway Works published by HMSO. The developer shall issue a certificate to that effect, signed by the design organisation.

Trunk Road modifications shall, in all respects, be designed and constructed to arrangements that comply with the Disability Discrimination Act: Good Practice Guide for Roads published by Transport Scotland. The developer shall provide written confirmation of this, signed by the design organisation.

The road works which are required due to the above Conditions will require a Road Safety Audit as specified by the Design Manual for Roads and Bridges.

Any trunk road works will necessitate a Minute of Agreement with the Trunk Roads Authority prior to commencement.

## Appendix 2: Section 75 Heads of Terms

A recorded or registered Section 75 Legal Agreement is required to be entered into between the Park Authority and the Landowner to secure the following:

1. The production, approval and implementation of a finalised Woodland and Landscape Management and Maintenance Scheme covering the whole of the development site. The purpose of the scheme is to ensure that existing woodland/tree cover is managed and new permanent woodland/tree cover is established around the proposed accommodation units and is maintained until establishment (and therefore a licensable size). The proprietors shall be obliged to maintain the landscape setting of the Development as a single common entity for all time coming in a manner consistent with the terms of the planning permission. The common areas of the planning application site, which common areas shall comprise any part of the planning application site not having a building on it and not being the curtilage of a building, shall be maintained and managed in perpetuity by the landowner of the planning application site in accordance with the approved scheme.

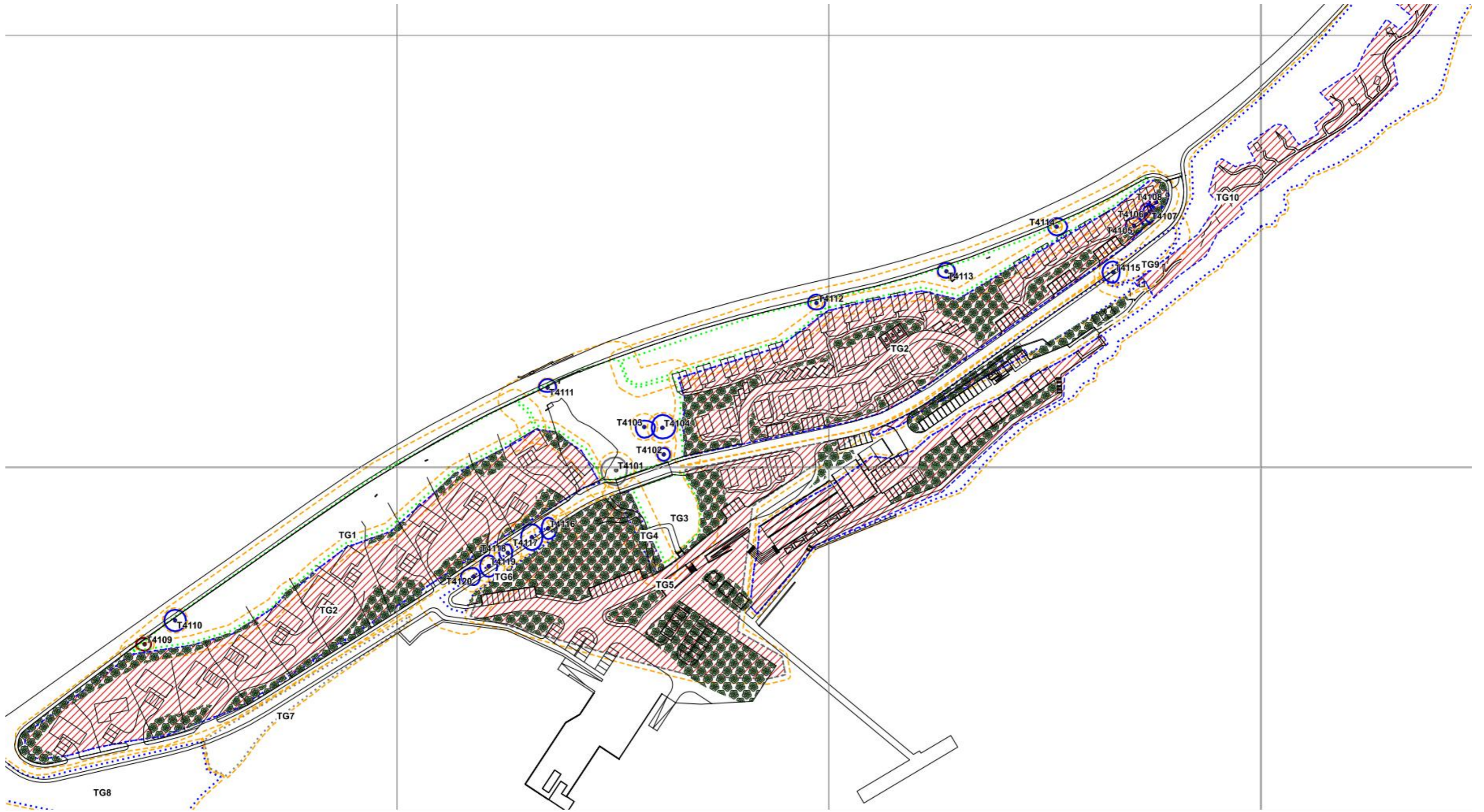
The approved Woodland Management Scheme shall detail the programme of works for an initial period of five years from dating from the beginning of site clearance and be reviewed every five years in perpetuity, unless otherwise agreed in writing by the Planning Authority. A detailed OS map should also be included clearly showing the compartment boundaries, areas to be planted and cleared etc.

The scheme should include details of new planting, beating up, felling, annual inspections, maintenance, associated wildlife management, management of deadwood, eradication of invasive species, details of protective fencing/tubes during establishment etc.

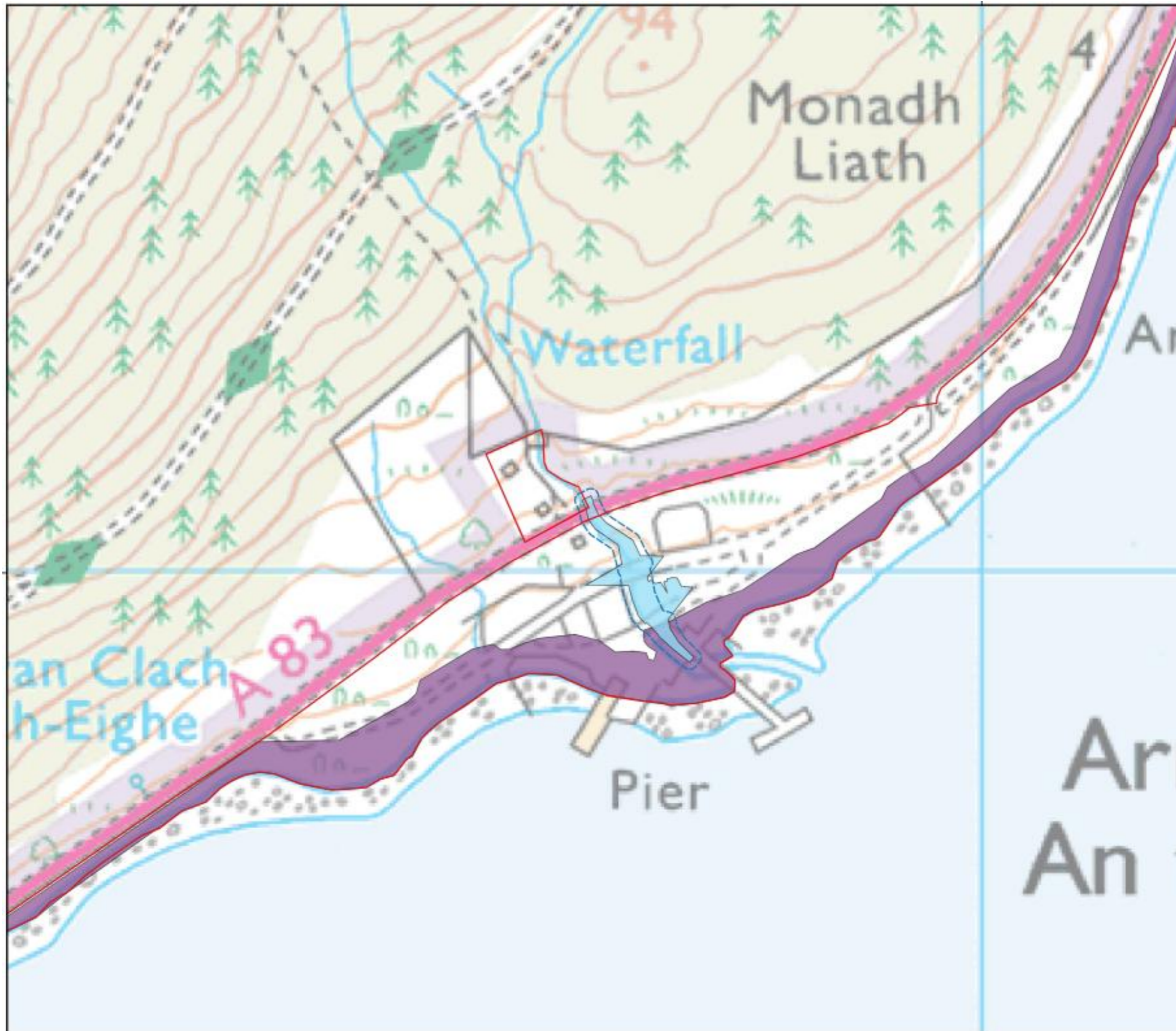
2. Off-site compensatory tree planting– A plan, to include location, area, stocking density, species, quantity, proportion, seed zone, tree type and size, ground preparation, planting method, mammal protection, maintenance and schedule – shall be submitted to, and approved in writing by, the Planning Authority. The area to be planted shall be 2.9ha in a location within the National Park to be agreed with the Planning Authority. The tree/trees shall be planted on site in accordance with the approved details, in the first available planting season. Any tree that within a period of five years after planting, dies or, in the opinion of the Planning Authority, becomes seriously damaged or defective shall be replaced with another of the same species and size as originally approved in a timetable to be approved in writing with the Planning Authority.
3. Securing the following matters in relation to the holiday home plots:
  - a. A phasing plan setting out when each holiday home plot may be sold in relation to the construction and implementation of the overall consent.
  - b. Restricting the occupancy of the holiday homes to second homes (not a primary residence).

- c. Removal of Permitted Development Rights for tourism development (dwellings): Notwithstanding the provisions of Part 1 and Part 2 of Schedule 1 of the Town and Country Planning (General Permitted Development) (Scotland) Order 1992 (or any Order revoking or re-enacting that Order with or without modification) no extensions to the buildings hereby permitted to be constructed shall be undertaken, nor shall any building or enclosure, hard surface, oil or gas storage tank, be installed/built within the curtilage of the new buildings which comprise the holiday home development that is the subject of this planning permission without planning permission being granted on an application made to the Planning Authority.

Appendix 3: Plans



Canopy Loss and Planting Plan



Proposed Leisure Development @ Former Torpedo Testing Range, Arrochar

Figure 1:  
Flood Risk Area

- Key
- Site Boundary
  - Watercourse 6m Buffer
  - 1:200 Plus CC Plus 50% Blockage Fluvial Flood Extent
  - 1:200 Plus CC Coastal Flood Extent

Scale @ A3: 1:3,000

0 50 100 m

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Date: 11-06-2024  
Prepared By: MM  
Reviewed By: DL  
Approved By: DL

## Appendix 4: List of Plans

<b>Title</b>	<b>Reference</b>	<b>Date Received</b>
Existing Location and Block Plan	606-AP-100 Rev A	06/10/2025
Proposed Site Plan - Demolition and Clearance	606-AP-108	10/10/2023
Proposed Masterplan	606-AP-109 Rev D	22/09/2025
Proposed Masterplan Parking Allocation	606-AP-112 Rev D	22/09/2025
Proposed Masterplan FFL and Flood	606-AP-116 Rev C	22/09/2025
Proposed Site Sections A-A and B-B	606-AP-120 REV B	14/07/2025
Proposed Site Sections C-C to F-F	606-AP-121 Rev C	22/09/2025
Proposed Pier Site Plan	606.AP.200 REV B	14/07/2025
Bunkhouse Proposed North and South Elevations	606.AP.310 Rev C	11/04/2025
Bunkhouse Proposed West and East Elevations	606.AP.311 Rev D	11/04/2025
Bunkhouse Proposed Ground Floor Plan	606-AP 301 Rev E	22/09/2025
Bunkhouse Proposed Site and Roof Plans	606.AP.300 REV D	14/07/2025
Holiday Homes Proposed Site Plan with Roof Plan	606 AP 400 Rev E	22/09/2025
Holiday Lodges - 1 Bed - Proposed Ground Floor Plan	606-AP-700	10/10/2023
Holiday Lodges -1 Bed - Proposed Roof Plan	606-AP-701	10/10/2023
Holiday Lodges - 1 Bed - Proposed Elevations	606-AP-710	10/10/2023
Holiday Lodges 2 Bed Proposed Ground Floor Plan (Accessible)	606-AP-750	11/04/2025
Holiday Lodges 2 Bed Proposed Roof Plan (Accessible)	606-AP-751	11/04/2025
Holiday Lodges 2 Bed Proposed Elevations (Accessible)	606-AP-752	11/04/2025
Holiday Lodges - 3 Bed - Proposed Floor Plans	606-AP-760	10/10/2023
Holiday Lodges - 3 Bed - Proposed Roof Plan	606-AP-761	10/10/2023
Holiday Lodges - 3 Bed - Proposed Front and Rear Elevations	606-AP-770	10/10/2023
Holiday Lodges - 3 Bed - Proposed Side Elevations	606-AP-780	10/10/2023
Site Plan Proposed Hardstanding at Caravans	606-AP-106 REV B	14/07/2025
Proposed Typical Motor Home Pitch	606-AP-503	10/10/2023
Proposed Glamping Facilities Plans and Elevations 1	606-AP-501	10/10/2023

Proposed Glamping Facilities Plans and Elevations 2	606-AP-502	10/10/2023
Composting WC Ground Floor Plan and Elevation	606-AP-610	10/10/2023
Pod Ground Floor Plan and Elevation	606-AP-601	10/10/2023
Pod Floor Plan & Elevation (Accessible)	606-AP-602	11/04/2025
Proposed Drainage Layout (Sheet 1 of 2)	24.0204-NAR-XX-XX-DR-C-9400 Rev P03	22/07/2025
Proposed Drainage Layout (Sheet 2 of 2)	24.0204-NAR-XX-XX-DR-C-9401 Rev P03	22/07/2025
Departure from Standard CD109 Supporting Drawing	24.0204-NAR-XX-XX-DR-C-9001 Rev P05	27/02/2026
Departures from Standards CD 123 & CD127 Supporting Information	24.0204-NAR-XX-XX-DR-C-9002 Rev P04	27/02/2026
Proposed Road Construction Details	24.0204-NAR-XX-XX-DR-C-9350 REV P01	19/08/2024
Proposed Roads Layout Sheet 1 of 3	24.0204-NAR-XX-XX-DR-C-9300 Rev P03	11/04/2025
Proposed Roads Layout Sheet 2 of 3	24.0204-NAR-XX-XX-DR-C-9301 Rev P02	11/04/2025
Proposed Roads Layout Sheet 3 of 3	24.0204-NAR-XX-XX-DR-C-9302 Rev P03	11/04/2025
Vehicle Tracking Fire Tender	24.0204-NAR-XX-XX-DR-C-9500 Rev P02	11/04/2025
Supporting Statement Addendum		19/12/2025