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Kettle Collective

22 August 2019

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PRE – APPLICATION ENQUIRY RESPONSE

Reference Number: PRE/2019/0134
Proposal: Erection of leadership centre: Conference facility and Accommodation
Location: Land Adjacent to Ross Priory, Gartocharn, West Dunbartonshire G83 8NL

Thank you for your pre-application enquiry for the above proposal which we received on 10 May 2019.

The proposal is to erect a leadership centre with conference facility and detached accommodation units on land to the north east of Ross Priory. The buildings would be located within the woodland between the shore of Loch Lomond and Ross Priory golf course. Full details of the proposed buildings have not been provided, a footprint has been indicated, however it is understood that the proposed leadership centre would be single storey and would be no higher than the tower feature of the existing stable block estimated on site to be approximately 7.5m high. Similarly, the accommodation units would also be single storey.

Development Plan Policies

There are a number of policy documents and material considerations which would be considered before a decision could be made on the proposal as you describe. The main policy document and relevant policies are listed below:

National Park Local Development Plan (2017-2021)

- Overarching Policy 1 – Strategic Principles
- Overarching Policy 2 – Developer Requirements
- Economic Development Policy 2: Economic Development in the Countryside and Small Rural Communities
- Transport Policy 2: Promoting Sustainable Travel and Improved Active Travel Options
- Transport Policy 3: Impact Assessment and Design Standards of New Development
- Natural Environment Policy 1: National Park Landscapes, Seascape and Visual Impact
- Natural Environment Policy 3: Sites of Special Scientific Interest, National Nature Reserves and RAMSAR Sites
- Natural Environment Policy 4: Legally Protected Species
- Natural Environment Policy 6: Enhancing Biodiversity
- Natural Environment Policy 8: Development Impacts on Trees and Woodlands
- Natural Environment Policy 11: Protecting the Water Environment

- Natural Environment Policy 13: Flood Risk
- Historic Environment Policy 3: Wider Built Environment and Cultural Heritage
- Historic Environment Policy 4: Gardens and Designed Landscapes
- Historic Environment Policy 5: Conversion and Re-use of Redundant Buildings
- Historic Environment Policy 8: Sites with unknown Archaeological Potential
- Open Space Policy 1: Protecting Outdoor Sports Facilities
- Waste Management Policy 1: Waste Management Requirement for New Developments

Supplementary Guidance (SG)

- Design and Placemaking

Planning Guidance (PG)

- Listed Buildings and Conservation Areas
- Visitor Experience

Please find details of the [policies and guidance](#) on our website

National Park Aims

Proposals will be determined with respect to the [National Park Aims](#)

Considerations

Principle

The principle of the proposal would be assessed against Economic Development Policy 2: Economic Development in the countryside and small rural communities. The policy wording is noted below for ease of reference.

Development proposals in the countryside for new or expanded businesses uses which support economic activity shall be supported, provided proposals can demonstrate that there is reasonable justification why they cannot be located within Economic Development Sites as shown within town and village maps; and where the proposal;

- (a) Involves home-working or live-work units from an existing residential property, or*
- (b) Is located within an identified Rural Activity Area or supports priorities identified within the Buchanan South or West Loch Lomondside Rural Development Frameworks, or*
- (c) Utilises redundant structurally sound traditional buildings, or*
- (d) Forms part of a building group where it can be demonstrated that there is a justification for the business to be located in a countryside location and there are no available sites within towns and villages, or*
- (e) Redevelops land which has been identified as vacant or derelict within the associated land audit.*

Economic Development may be supported in some instances where this forms part of a long term farm or estate-wide business management plan.

It is noted that the Vision Statement, as submitted in support of your development proposal, states that:

‘Locating the HGLC at Ross Priory will enable an underutilised, but nevertheless outstanding A listed Gothic mansion to be brought back to life there; repurposed and sustainable as one element of an overall leadership development location.’

The development of the HGLC will enable Ross Priory to host both larger educational events and increase its bedroom capacity for the wedding and tourism market when HGLC is not in use by The Hunter Foundation.’

‘Linkage to the existing Ross Priory will be achieved both through multi-utilisation of both facilities, enabling Ross Priory to extend its ‘hotel’ provision and conference facilities – when not

in use by the Hunter Foundation – and by creating innovative vistas between both buildings; innovation meets history to deliver leadership for the future.'

The proposal could therefore potentially receive support in principle as an exception to this policy as it could support the viability of Ross Priory. Supporting evidence in the form of a comprehensive estate wide business management plan should be provided to demonstrate how the operation of the leadership centre would support the operation/sustainability of Ross Priory and the wider estate. This should include full details of the proposed operation of the leadership centre as a conference facility, potential delegate numbers; requirement for accommodation pods and how the number of accommodation pods has been derived; requirement for other uses within the centre and resultant scale of building; multifunctional use; envisaged split of use between leadership centre use and use secondary to Ross Priory (wedding use function, additional accommodation). This list is not exhaustive but is to demonstrate the type and level of detail required.

Ross Priory is an important 'A' listed building within the National Park and the opportunity to preserve the building and secure its future must be central to the proposal and is key to the proposal receiving policy support. In addition, as the business plan should cover the whole estate, the opportunity should be taken to enhance the overall amenity of the estate including the former stable building and pigsty and boat yards on the shore of the Loch.

Site considerations

Landscape and Visual Amenity

The development is proposed within the nationally designated Loch Lomond and the Trossachs National Park and as such its Special Landscape Qualities require to be managed carefully and safeguarded. The qualities of the sub area Loch Lomond noted in Part 2 of the Special Landscape qualities of the Loch Lomond and the Trossachs National Park document equate to the original descriptions and succinct overview of the Loch Lomond National Scenic Area <https://sitelink.nature.scot/site/9135> (1978) and includes the Ross Priory Garden and Designed Landscape <http://portal.historicenvironment.scot/designation/GDL00329> which forms the main characteristics of its' local landscape character.

The revised proposal to set the building back from the loch shore is welcomed however the resultant impact on trees will be a key consideration (see section on Trees and Woodland). The site is highly visible from Loch Lomond, Balmaha, Inchailloch and to loch users. Its integration into the landscape is therefore very important and further information is required to allow an informed assessment to be made. From the outset it is however important to note that there is some concern regarding the overall scale of development proposed and density. Opportunities to reduce the scale of the leadership centre should be explored as it would be an imposing building on a prominent lochside location. Similarly, a reduction in number of accommodation pods and reduction in number of pods per grouping to reduce massing should be investigated. Dependent on site constraints (flooding, native woodland, golf course) opportunities could also be explored to re-locate some of the accommodations pods or spread them out further to reduce the visual impact of the development. The true footprint of the development should also be provided, buildings, road access, foot path network, service areas, parking, utilities infrastructure, wider landscaping to allow a full assessment and advice to be provided at an early stage.

The degree of glazing proposed could become dominant feature, particularly when it is dark the building could become a beacon (this also has the potential to impact on wildlife). Consideration should be given to internal lighting levels

A Landscape Appraisal should be produced to demonstrate the landscape capacity of the site, the site sensitivities and likely magnitude of change and significance via a narrative of the special landscape qualities of the area, landscape character types, visual amenity and key views and receptors.

For reference, the Special Landscape Qualities for the site are:

- A world renowned landscape famed for its rural beauty
- Water in its many forms
- Tranquillity
- Two Lochs in one
- A multitude of beautiful islands

The Landscape Character Types are:

- Lowland Loch Basin (direct)
- Rolling Farmland (indirect)
- Parallel Ridges (indirect)

The local landscape character of the designed landscape – key views, features etc should also be recognised and noted in the appraisal.

The following documents should be used to inform the Landscape Appraisal

- <https://www.nature.scot/snh-commissioned-report-376-special-landscape-qualities-loch-lomond-and-trossachs-national-park>
- <https://www.nature.scot/professional-advice/landscape/landscape-character-assessment/scottish-landscape-character-types-map-and-descriptions>
- <http://portal.historicenvironment.scot/designation/GDL00329>
- Guidelines for Landscape and Visual Impact Assessment (version 3)
- Draft guidance on the Assessment of Special Landscape Qualities including template – to be included in Landscape Appraisal report

Viewpoints should be selected with the agreement of the National Park staff and should take account of Duncryne Hill, West Loch Lomond and Loch Lomond. A Zone of Theoretical Visibility map will assist with viewpoint selection. Views from the Priory to the Loch are also important and should be considered.

Photomontages are also required of the development in the landscape to demonstrate how it ‘fits’.

Opportunities should be explored, as part of the wider estate management, to improve and extend the loch shore fringe woodland particularly at the boat yard – this could provide some landscape mitigation for the wider development

Design

Please provide some initial design drawings/sketches and material specifications to allow further comment on the design of the leadership centre and accommodation pods. We would welcome an open approach to this and a variety of options to be presented. This will also allow the design development/options appraisal to be demonstrated in any forthcoming planning application

Trees and Woodland

The eastern end of the woodland by the shore is identified as native woodland in the Native Woodland Survey of Scotland (NWSS). The Scottish Government’s Control of Woodland Removal Policy includes a presumption in favour of protecting woodland and there is a strong presumption against the removal of certain woodland types including those listed in the EC Habitats Directive (Annex 1 habitats) and UK BAP priority woodland types. These principles are also embedded in Natural Environmental Policies 8 and 9 of the LDP. As a result, it is important that areas of native woodland are retained in the design of the development. An NVC habitat survey will be required of any native woodland affected by the proposals to establish its

biodiversity value and identify any Scottish Biodiversity List/UK BAP Priority habitats and Annex 1 habitats that require particular protection.

There is some significant concern of the scale and density of development proposed within the woodland and the extent to which the woodland would be impacted upon. A tree survey in accordance with 'British Standards 5837: Trees in relation to Design, Demolition and Construction' will be required. Using this information, you should design an initial site layout to minimise impacts on trees and identify areas for new planting – this should then be submitted to the Planning Authority to aid further meaning pre-application discussion on the appropriate siting of any new buildings to avoid impacting on native woodland and important trees within the site. A Tree Constraints Plan (including root protection zones) should then be prepared to detail the methods for construction work.

Ecology

Portnellan - Ross Priory - Claddochside SSSI

As identified in the supporting information, Portnellan - Ross Priory - Claddochside SSSI lies adjacent to the site. The SSSI is notified for its geological landforms and sediments (Quaternary of Scotland). These features are sensitive to activities that would affect the landforms, sediments or obscure access/visibility to them (e.g. extraction, dumping, afforestation). The Site Management Statement, produced for the site by SNH, highlights that sections of the sediment at Ross Priory have previously been obscured by the construction of riprap shoreline protection. There should be no development within the SSSI and the infrastructure requirements will also need careful consideration to ensure that there will be no direct or indirect impacts on the SSSI (e.g. from services or shoreline protection works). Aside from avoiding negative impacts, there might be scope to improve access to and visibility of the features through sensitively designed access proposals associated with the development. It is recommended that you seek pre-application advice from SNH on the impacts and opportunities for the SSSI.

Protected species

The site analysis report indicates that initial ecology surveys have been completed and that further studies are currently underway. Full details of the completed and planned surveys are not provided and therefore only general comments are provided at this stage. Development in the woodland areas is likely to require more extensive mitigation/compensation measures as these areas are more likely to support protected species. The National Park Natural Heritage Advisor would be happy to provide further input once more details of the completed survey work and development are available. All survey work for protected species must be carried out in accordance with best practice guidelines - <https://www.nature.scot/professional-advice/planning-and-development/natural-heritage-advice-planners-and-developers/planning-and-development-protected-animals>.

The initial ecology survey has identified that the trees and existing buildings/structures within this site have potential to support bat roosts. Further survey work is being carried out "*into potential presence of bats in these structures*" but it is unclear whether this survey work extends to the trees on the site. For the avoidance of doubt, the trees within and adjacent to the development site are required to be assessed for their potential to support bat roosts and further survey work carried out to establish the presence/absence of roosts in any suitable trees. This information will be required in support in any future planning application.

All survey work for bats should be carried out in accordance with the *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (3rd edn) - Bat Conservation Trust (<https://www.bats.org.uk/resources/guidance-for-professionals/bat-surveys-for-professional-ecologists-good-practice-guidelines-3rd-edition>). If any roosts are likely to be affected by the proposals, the design of the development should be amended to avoid impacts or mitigation/compensation measures devised to minimise any impacts. The buildings and structures should also be checked for breeding barn owls in conjunction with the bat surveys (barn owl nests are protected from disturbance when they are in use).

A walkover survey of the site to check for signs of other protected species should also be carried out. In particular, otters are likely to use the shore and the riprap and woodland in the wider area may provide opportunities for holts and other shelters even although the western end of the site is likely to be subject to a high level of disturbance. The trees and woodland within the site and the wider area may also have potential to support red squirrel, pine marten and badgers. Where impacts on protected species are identified, mitigation measures should be devised to avoid or minimise any impacts.

Consideration should also be given to the potential for lighting associated with the development to impact on bats and other protected species. The Bat Conservation Trust has produced specific guidance on this issue in partnership with the Institution for Lighting Professionals and this guidance should be considered with designing proposals for the site-

<https://cdn.bats.org.uk/pdf/Resources/ilp-guidance-note-8-bats-and-artificial-lighting-compressed.pdf?mtime=20181113114229>. In short, there should be no lighting of confirmed bat roost entrances, flightpaths or important habitat features for bats and other protected species.

Habitats

A Phase 1 Habitat Survey should be undertaken of all affected habitats and an appropriate buffer to assess more distant effects and to inform any redesign or micro-siting. Should any habitats listed on Annex 1 of the EC Habitats Directive, Scottish Biodiversity List or potential Ground Water Dependant Terrestrial Ecosystems (GWDTE) be identified during the Phase 1 Habitat Survey, these areas must be subject to an NVC survey to inform the design process so that the development avoids, where possible, fragile and priority habitats. Where this is not possible, suitable restoration and/or compensation measures should be presented in the planning application.

The proposed restoration of the shore line to the historic loch shore line from 1966 could provide biodiversity/morphology benefits if it is sensitively designed to produce a more natural shore line. A fish spawning survey may be required for works on the shore line. Discussion is required with SEPA.

The location of any invasive non-native species present within the survey area should be established through the Phase 1 Habitat survey and measures identified in the planning application to treat any present and prevent them spreading into new areas.

Access and parking

No consultations have been carried out as part of this pre-application response and I strongly advise you to contact West Dunbartonshire Council Roads Authority to gain an initial view on the road capacity at the site.

It is not clear if the revised proposal (with the buildings within the tree line) continues to propose a new access road to the leadership centre. Whilst the principle of this is acceptable as discussed during a site visit, further detail would be required to assess any potential impact on landscape, ecology, trees and the golf course. The location of any parking provision has not been identified and this is an important issue to address at an early stage. The Proposed location of the leadership centre is now detached from the stables – opportunities could be explored at the stables location to provide parking which is screened from the Loch and utilise the stable buildings as service buildings in support of the leadership centre or provide staff accommodation.

Service areas

The building as proposed effectively has 4 frontages, there is therefore no clear rear service area to support the function of the building, ie bin storage, air-conditioning units etc. Consideration should be given to this at an early stage to ensure that the vision of the building as an architectural statement is not reduced.

Climate Friendly Design

Overarching Policy 2 of the Local Development Plan requires all new development to demonstrate how it will meet a reduction in greenhouse gas emissions through; Minimising overall

energy requirements through conservation measures and incorporating on-site low and zero carbon generating technologies.

Other

The site is part of a SEPA Waste Water Drainage Consultation Area

<https://www.sepa.org.uk/environment/land/planning/guidance-and-advice-notes/waste-water-drainage-consultation-areas/>

There are two archaeological triggers areas within the vicinity of the site – it is likely that WOSAS will provide a consultation response on any future application at the site.

If you wish to pursue this proposal then you can apply online or download the necessary application forms at the government's planning portal at www.eplanning.scot/. You will be required to submit the correct set of application forms and certificates, and a set of scaled drawings (Location/Site Plan, Elevations, Floorplans) with your submission. Further guidance can be found at the government's planning portal when you apply for permission. There is advice on [how to make a valid application](#) on our website which explains how to produce your red line plan and other documents.

You should note in addition to the plans I recommend that you submit the following information to assist in determining the application:

- Estate Wide Business Management Plan
- Phase 1 Habitat Survey
- NVC Survey (If applicable)
- Bat Survey (covering relevant buildings and trees)
- Walkover survey for protected species
- Energy Statement demonstrating compliance with climate friendly design.
- Tree Survey
- Tree constraints plan
- Landscape Appraisal including photomontages
- Cross-sections showing the development in relation to the golf course and Loch Lomond
- Flood Risk Assessment (dependant on SEPA requirements)

Further advice on survey requirements can be found in our [Design and Placemaking Guidance](#).

Disclaimer

Please note that any pre-application advice we provide is not a formal decision by the Authority and cannot bind its future decision making. Any views or opinions expressed are given in good faith and to the best of my professional ability, but are without prejudice to the formal consideration of any planning application following statutory consultation and evaluation of all available information.

If you have any queries regarding the content of this letter please feel free to contact me. You may also wish to contact Building Control for advice on whether a Building Warrant is required.

Yours sincerely,

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