

**Classification: OFFICIAL**

Regards

*Lindsay*

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**From:** Lara via Scottish Greens <webteam@mail180-27.suw31.mandrillapp.com> **On Behalf Of** Lara via Scottish Greens  
**Sent:** 01 May 2020 22:50  
**To:** handl, planning <planning.handl@argyll-bute.gov.uk>  
**Subject:** Objection to application 20/00094/PP

Dear Argyll and Bute Council,

I object to the application 20/00094/PP on the following grounds:

- The application as it stands has no provision for affordable housing, in contravention of the Local Development Plan's requirements.
- A significant part of the site is listed on the Ancient Woodland Inventory and is recognised as Atlantic Rain Forest. While removal of invasive species (rhododendron) will benefit biodiversity overall, this can be done by utilising grants offered by the Scottish Government and others, and therefore is not material to the question of whether this application is acceptable.<sup>[1]</sup>

Trees have already been lost on this site during the process of rhododendron removal, and the application would see a further loss of ancient woodland and Atlantic Rainforest that new tree planting and landscaping can never replace. Local residents have observed otters, European long-eared bats, red squirrels, pine martens and greater crested newts either on or very near the site. Loch Long has long been home to a population of porpoises.<sup>[1]</sup>

Brown long-eared bats, a European protected species, have been present in the local area for many years, as shown by surveys done on surrounding properties and the survey done as part of the application was done at a time that they were in hibernation. Given the likelihood of a protected species present on the site, development without a full and satisfactory bat survey in this location would be unlawful. Scottish Planning Policy states that Planning permission must not be granted for development that would be likely to have an adverse effect on a European protected species.

David Nairn of Clyde Porpoise CIC has clearly identified that nearby Loch Goil is one of few known homes to the Sea Squirt *Styela Gelatinosa*. Due to military restrictions the bed of Loch Long has not been searched for some time, but it is highly likely that the sea squirt population extends to this part of the loch. Adding to the existing challenges posed by differences in temperature caused by the climate crisis, sea squirts are highly vulnerable to changes in water composition that can be affected by loss of flora close to the shore.

For these reasons, the application clearly fails the tests set out in policy LDP3. [L] [SEP]

- The scale of the development is inappropriate for this location. Twelve large houses, of which at least three are in effect Houses in Multiple Occupation would have a significant impact on the existing settlement and put pressure on infrastructure, particularly the only road through Portincaple, which is clearly not designed for more traffic than the existing use. [L] [SEP]

While the applicant has only indicated intention to build 12 houses, the fact that road access and utilities will be installed will help open up a much larger space to the south and create pressure in future for further development in this area. This means that the proposals are, in practice, much bigger than the infill consisting of up to 5 dwellings that the Local Development Plan Policies envisage (Policies LDP DM1, SG LDP HOU1 and LDP 8). This will mean further loss of woodland and harm to biodiversity mentioned above. [L] [SEP]

- There are significant concerns about the impact on the local community, and these mean that the tests set out in LDP STRAT 1 are failed. [L] [SEP]

While the application claims to reinstate an easy route to the shoreline, there is little evidence that reaching the shore on foot has ever been a problem for local people, it is used daily for leisure purposes and the main track has existed continually for at least 140 years. [L] [SEP]

The location does not utilise public transport links - there is no current bus service and it is unlikely that there would be sufficient interest to make this economically viable. While the location is 3-4 miles from the local major employer, HMNB Clyde, the route follows a main road and is not well set up for walking and cycling, especially in winter. This is disappointing given the element of affordable housing promised. [L] [SEP]

Introducing high density accommodation and terraced housing in a location where all houses are dispersed and detached changes the long-standing character of the settlement and will have to be reflected in provision of infrastructure. The ancient woodland on the site acts as a screen to prevent houses dominating views, but this is more of a challenge with higher density housing. This is particularly important in a recognised Area of Panoramic Quality (APQ). [L] [SEP]

- The Firth of Clyde Marine Spatial Plan requires the potential “for visual clutter if additional development onshore or offshore is sited near to the existing Coulport or Finnart oil terminal developments.” to be avoided. This proposal, combined with loss of woodland, would provide such a visual impact.

Many aims of the developers are highly laudable, particularly the very high standards of energy efficiency and the groundbreaking use of loch-sourced heat. However, this is simply not the right

location.

I call on Argyll and Bute council to reject the planning application for reasons listed above, and

- Work with the local community to access support and funding to remove invasive species and support and protect biodiverse woodland and access to the shoreline.
- Work with the applicant and architect to ensure that the best practice in energy efficiency, renewable energy generation and building materials are used in future affordable housing development in Argyll and Bute in other locations.
- Work with the local community to establish and improve active travel infrastructure in and around Portincaple.

Best Wishes,

Lara  
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