Agenda Item	5.1
Report No	PLS-008-21

HIGHLAND COUNCIL

Committee: South Planning Applications Committee

Date: 03 February 2021

Report Title: 20/02342/PIP: Ms Christy Marshall

Ladystone Farm, Bunchrew, Inverness

Report By: Area Planning Manager – South

Purpose/Executive Summary

Description: Conversion of steading to form short term let holiday accommodation

(10 units) and associated facilities

Ward: 12 – Aird And Loch Ness

Development category: Local

Reason referred to Committee: Objection from Community Council and 5 or more

representations

All relevant matters have been taken into account when appraising this application. It is considered that the proposal accords with the principles and policies contained within the Development Plan and is acceptable in terms of all other applicable material considerations.

Recommendation

Members are asked to agree the recommendation to **Grant** planning permission in principle as set out in section 11 of the report.

1. PROPOSED DEVELOPMENT

- 1.1 The proposal is to bring a dilapidated farm steading building back into use as holiday accommodation comprising of 10 individual units with associated facilities including a spa, gym, café, shop, bike hire, library and car park at Ladystone Farm, Bunchrew. On-site facilities will be for the sole use of the guests. As the application is in principle, no details for the conversion have been provided.
- 1.2 Access to the site is taken from the A862 public road via the unadopted Ladystone Road. However, for the purpose of this application, the applicant is proposing an alternative access approached from the south-east via Leachkin Brae before utilising a section of a historic drove road, that ran from Inverness to Blackfold and Abriachan, before dropping down an existing farm track towards the Cross Burn. It is proposed that the access will terminate with the formation of a car parking area on the south side of the burn. Access to the building is to be controlled at this point with no vehicular access between this route and the existing Ladystone Road.
- 1.3 It is proposed to connect to the public water supply network. A private drainage system has been indicatively shown to the north of the car park.
- 1.4 Pre-Application Consultation: Pre-application advice was given for the redevelopment of the dilapidated steading to holiday accommodation and the erection of a manager's house (19/05199/PREAPP). Whilst the pre-application response noted there was general support in principle within the Development Plan and relevant supplementary guidance for tourist accommodation which would bring a derelict, dilapidated building back into use, details such as the proposed design, materials, scale, access, parking, drainage provision etc. would require further consideration as part of any future planning application. Further justification for the manager's house outlining compliance with Policy 35 of the Development Plan would also be required. The pre-application response noted the speculative proposal would require substantial further details for a thorough assessment and more informed response.
- 1.5 Supporting Information: Planning in Principle Report including site photos, Construction Traffic Management Plan, Transport Statement, Waste Management Plan, Operational Management Plan, Preliminary Roost Assessment and legal judgement regarding access rights.
- 1.6 Variations: The application description was amended following discussion with the applicant, planning consultant and agent to better reflect the proposal. Whilst the agent insisted the initial description of conversion to a hotel was correct, the planning consultant and applicant later confirmed the amended description of conversion to short term holiday accommodation (10 units) was appropriate. Amended Indicative Site Layout Plan 904_102 REV A submitted.

2. SITE DESCRIPTION

2.1 The site is a redundant enclosed traditional steading building with associated field adjacent and wider sloping landholding with sparse woodland to the south east. The area is in a relatively rural setting with scattered housing outwith Bunchrew and is set back approximately 1.7km from the main settlement. The former steading

building is surrounded by the adjacent Ladystone House, Ladystone Farm House and Ladystone Cottage. The site is currently accessed by an unadopted and substandard, albeit tarred, track leading from the A862 public road via a private weight restricted railway bridge. There is however an alternative access from Leachkin Brae along a historic drove road track to the south east which has been used previously for agricultural access. The Great Glen Way is located to the south east of the site along a portion of the drove road. A small watercourse Cross Burn to the south east of the building flows through the site.

- 2.3 There are no natural, built or cultural heritage designations on this site.
- 2.2 The existing building and the proposed car park are within the Kirkhill and Bunchrew Community Council area. A portion of the access from the drove road/Great Glen Way is within the Inverness West Community Council area.

3. PLANNING HISTORY

3.1 None

4. PUBLIC PARTICIPATION

4.1 Advertised: Initially advertised as Section 3 Development and Unknown Neighbour and then re-advertised following the amended description.

Date Advertised: 10.07.2020, 07.08.2020 Representation deadline: 21.08.2020

Timeous representations: 29 (24 against, 3 in favour, 2 neutral comments)

Late representations: 0

- 4.2 Material considerations raised are summarised as follows:
 - a) compliance with the development plan and other planning policy
 - b) layout and design
 - c) existing infrastructure and planning history
 - d) inappropriate access arrangements
 - e) disruption and increased traffic during and after construction
 - f) road safety
 - g) impact on neighbour amenity
 - h) water run-off from the access
 - i) impact on protected species
 - i) loss of habitat
- 4.3 All letters of representation are available for inspection via the Council's eplanning portal which can be accessed through the internet www.wam.highland.gov.uk/wam.

5. CONSULTATIONS

- Kirkhill and Bunchrew Community Council object to the application. Kirkhill and Bunchrew Community Council raised concerns regarding the proposed access from Leachkin Brae which they considered sub-standard. Reference was made to a previous meeting in 2018 between the Kirkhill and Bunchrew Community Council, local residents and Highland Council's Area Planning Manager where these concerns were discussed.
- Inverness West Community Council note the impact of the proposed development on traffic volume and frequency along Leachkin Brae noting the road improvements may create a popular loop from Charleston to Bunchrew which is currently discouraged due to the current standard of track. Inverness West Community Council considered the road safety and increased traffic concerns should be considered in full following consultation with relevant consultees prior to determining the application.
- 5.3 **Transport Planning Team** initially objected to the proposal but following the submission of further information including a Construction Traffic Management Plan, Transport Statement and Waste Management Statement has confirmed that it has no objection subject to conditions.
- 5.4 The Transport Planning Team made a number of recommendations to upgrade the access which include strengthening of both the carriageway edges along the whole length of Leachkin Brae; the upgrade of all 8 passing places on Leachkin Brae to standard size as shown within the Roads and Transport Guidelines for New Developments Supplementary Guidance; all 8 passing places are to be constructed to a carriageway pavement design acceptable to the Transport Planning Team; replacement of passing place signage with new signs, poles and foundations; demonstrate that the passing places on Leachkin Brae are currently inter-visible and if not, provide new passing places; upgrade the existing drove road passing places to standard size as shown within the Roads and Transport Guidelines for New Developments Supplementary Guidance; and provide additional standard size intervisible passing places on the drove road.
- 5.5 The Transport Planning Team noted that traffic generated by the proposal has been derived from a TRICS assessment but due to a lack of TRICS survey data the traffic figures are based on 2 sites with no direct compatibility to the 10 unit holiday accommodation proposed. Although the Transport Planning Team are unable to demonstrate what the actual traffic volumes generated by this development are likely to be it considers that the figures presented in the Transport Statement to be an under representation.
- The Transport Planning Team also noted that while the Construction Traffic Management Plan submitted is helpful it has not been able to determine the impact construction traffic will have on Leachkin Brae given the lack of clarity regarding volume and type of construction traffic, mitigation measures on the local road network following detailed assessment of relevant roads, details of appropriate upgrading works at the junction of the site access and the public road and details of

- any traffic management signage and or road closures required for the duration of the construction period.
- 5.7 Additionally, there was not sufficient confidence that the proposed 20 construction staff working on site will live nearby and be bused to the site in order to minimise traffic impact on the surrounding road network which was considered unrealistic and should be addressed. As such, it is recommended that prior to the start of any works the developer shall, in consultation and agreement with the local Roads Operations Manager, establish a Construction Traffic Management Plan aimed at controlling and minimising the impact of construction activities on the local road network which will be controlled by condition. Full details of the mitigation work on Leachkin Brae will also have to be fully clarified and will be controlled by condition. Additionally, an Informative is attached with reference to Section 96 of the Roads (Scotland) Act 1984 agreement and Road Bond which will be required.
- 5.8 **The Highland Council Access Officer** initially objected to the application but following the submission of further information has revised this position to one of no objection subject to conditions. The Access Officer noted that any negative impacts on public access in general, and the Great Glen Way in particular, will need to be mitigated with full details of that included within an Access Management Plan to be controlled by condition. This mitigation will be in the form of a segregated 2m wide path serving as the Great Glen Way running parallel to the upgraded section of the drove road with associated drainage prior to the start of construction.
- 5.9 **Environmental Health (Contaminated Land)**: No objections subject to conditions. The Contaminated Land Team note that historical maps indicate the site was formerly used as a sawmill which may have resulted in land contamination. Additionally, photos provided in support of the application show a number of potential fuel or timber treatment tanks. Therefore, an assessment of the potential contamination issues along with evidence the site is suitable for its proposed use is required.
- 5.10 **Historic Environment Team**: No objections subject to conditions. The Historic Environment Team note the application will have an impact on a building considered to be of historic importance and a photographic record of the redundant steading and associated buildings is to be submitted prior to works commencing on site.
- 5.11 **Environmental Health**: No objections subject to conditions. The Environmental Health Team's main concerns with such development is the potential noise from the operational plant equipment associated with the swimming pool, kitchen ventilation system, refrigeration equipment, air conditioning etc. and odours from the kitchen ventilation system which could affect the amenity of nearby residential properties.
- 5.12 **The Highland Council Forestry Officer**: No objections subject to conditions. The Forestry Officer noted that it is possible that trees could be adversely affected by road widening and additional passing places which would need to be confirmed for any future application.
- 5.13 **Network Rail**: No objections subject to conditions attached to reduce the risk of additional traffic using Overbridge 302/017 over the railway line and on to Ladystone Road Network. Construction traffic and guests will need to utilise the upgraded

Leachkin Brae/drove road access to the south east of the site with the improvements to the road controlled by conditions. Additionally, all marketing materials associated with the holiday accommodation and signage at appropriate locations shall direct guests to use the upgraded Leachkin Brae/drove road access and will be controlled by condition.

5.14 **Scottish Environmental Protection Agency** initially objected to the proposal but following the submission of further information it now has no objection subject to conditions.

6. DEVELOPMENT PLAN POLICY

The following policies are relevant to the assessment of the application:

6.1 Highland Wide Local Development Plan 2012

Policy 28 - Sustainable Design

Policy 29 - Design Quality & Place-making

Policy 30 - Physical Constraints

Policy 42 - Previously Used Land

Policy 43 - Tourism

Policy 44 - Tourist Accommodation

Policy 51 - Trees and Development

Policy 52 - Principle of Development in Woodland

Policy 56 - Travel

Policy 57 - Natural, Built and Cultural Heritage

Policy 58 - Protected Species

Policy 64 - Flood Risk

Policy 65 - Waste Water Treatment

Policy 66 - Surface Water Drainage

Policy 77 - Public Access

Policy 78 - Long Distance Routes

6.2 Inner Moray Firth Local Development Plan 2015

Policy 3: Other Settlements - Bunchrew

6.3 Highland Council Supplementary Planning Policy Guidance

Roads and Transport Guidelines for New Developments (May 2013)

Green Networks (Jan 2013)

Highland Historic Environment Strategy (Jan 2013)

Highland's Statutorily Protected Species (March 2013)

Managing Waste in New Developments (March 2013)

Sustainable Design Guide (Jan 2013)

Physical Constraints (March 2013)

Trees, Woodlands and Development (Jan 2013)

Supplementary Guidance on Housing in the Countryside; Siting and Design

7. OTHER MATERIAL POLICY CONSIDERATIONS

7.1 Scottish Government Planning Policy and Guidance

Scottish Planning Policy (The Scottish Government, June 2014)

7.2 The Highland Council - Core Paths Plan

Core Paths in Inverness and Nairn (Map 8 – The Aird, Map 9 – Inverness West, Map 10 – Inverness South)

8. PLANNING APPRAISAL

8.1 Section 25 of the Town and Country Planning (Scotland) Act 1997 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

Determining Issues

8.2 This means that the application requires to be assessed against all policies of the Development Plan relevant to the application, all national and local policy guidance and all other material considerations relevant to the application.

Planning Considerations

- 8.3 The key considerations in this case are:
 - a) compliance with the development plan and other planning policy
 - b) layout and design
 - c) impact on neighbour amenity
 - d) existing infrastructure constraints
 - e) access arrangements, traffic and road safety
 - f) flood risk and drainage
 - g) impact on forest resource
 - h) impact on habitats and protected species
 - i) any other material considerations

Development plan/other planning policy

- 8.4 The key policies relevant to this proposal are Policies 43 and 44 of the Highland-wide Local Development Plan (HwLDP). Since the proposal adjoins the settlement of Bunchrew, Policy 3 of the Inner Moray Firth Local Development Plan is also relevant. Given that it lies within the Hinterland of Inverness, Policy 35 of HwLDP applies along with the Supplementary Guidance on Housing in the Countryside: Siting and Design. As with all development proposals, consideration must be given to how the proposal addresses the criteria listed within Policy 28.
- 8.5 The development plan is supportive of tourism related development where the scale of the proposal is appropriate to its location, it can complement existing tourist

facilities, increase the length of peoples' stay and their spend, promote a wider spread of visitors and will have a positive effect on natural, built and cultural heritage features.

- 8.6 The policy framework seeks to ensure that development, which in this case is tourist accommodation development, would not adversely impact on individual and community residential amenity, harm the character and/or social balance of the community, adversely impact locally important heritage features, can be accommodated without significant impact on existing services and that it demonstrates sensitive siting and high quality design. It is with regard to this latter point that Policy 35 and its associated Supplementary Guidance on Housing in the Countryside: Siting and Design is particularly concerned with. Where Policy 35 relates to Policy 44, it principally aims to ensure that holiday accommodation, capable of being used for permanent housing, is only allowed where a permanent house would be permitted. In this case, the proposal is for a holiday accommodation business utilising an existing, largely intact, historic steading building. It does not relate to single, or even small groups, of housing in the countryside.
- 8.7 Other policies of the Highland wide Local Development Plan are relevant and must be given due weight in considering this proposal in the round. These include, but are not limited to, Policy 30 Physical Constraints, Policy 51 Trees and Development, Policy 56 Travel, Policy 58 Protected Species, Policy 77 Public Access and Policy 78 Long Distance Routes which are considered in greater detail within the remainder of this assessment.
- 8.8 It is considered that the site is appropriately located for tourist development, particularly given its proximity to Inverness and existing facilities such as the Great Glen Way long distance route. Subject to the development having no significantly detrimental impact on individual and community residential amenity, locally and nationally important heritage features or existing services and that it can demonstrate sensitive siting and high-quality design appropriate to its location, the proposal would comply with the Development Plan.

Layout and Design

- 8.9 While no designations are attached to the redundant steading it is of local historic importance. Supplementary Guidance supports the conversion and redevelopment of traditional steading buildings where it can be demonstrated that the building is capable of the proposed work and maintains the style and character of the original building in terms of form, scale, materials and detailing, when they contribute positively to the context and setting of the area. The Sustainable Design Guide states that "favouring a traditional approach to design does not mean that only traditionally designed houses will be supported. On the contrary, innovative approaches to design and the use of sustainable materials will be welcomed, providing the result is sympathetic to the setting of the particular development". There is scope to retain the traditional form and detailing seen on the outward elevations but utilise a more modern vernacular internally.
- 8.10 As the application is in principle the indicative design, materials and layout shown on the submitted plans and supporting information are representative only. The indicative site plan shows 10 holiday accommodation units (a mix of 6 standard

suites along with 4 larger deluxe suites, all over 2 storeys) along with a wellness centre which includes a reception area, shop, spa, gym, café/lounge/library and indoor and outdoor communal areas. The applicant has confirmed the facilities are for the use of quests only.

- 8.11 The statements submitted in support of this application set out that the intention is to retain the historic form and fabric of the building preserving the enclosed four steading wings and internal courtyard for use as holiday accommodation within the rural setting. The wall heads of the western and north western wings are to be increased to 1½ storeys to create a consistent ridge line on all four sides of the steading. Poor quality blockwork and the redundant grain silo adjacent to the south eastern elevation will be removed. The partially collapsed south eastern elevation will be rebuilt to house the spa, gym and associated facilities with the café/lounge/library and suites filling the rest of the former steading.
- 8.12 There is potential to create a high-quality development utilising a mixture of stone, slate and timber whilst retaining reclaimed materials from the site that will appear as a traditional building in terms of scale, detail and vernacular. The proposal is in principle only, therefore siting and design details are not required at this stage. Representations raise concerns regarding the lack of information provided in support of the application with regards to design and materials. It is considered that adequate control exists through the requirement of a further Matters Specified in Conditions application to ensure development remains in keeping with the character of the existing scattered rural nature of the area.

Neighbour Amenity

- 8.13 The indicative plans show the general outlook from the steading will be to the north west from the accommodation and to the south east from the spa and gym facilities broadly away from the 3 surrounding residential properties. The indicative plans show the car park set back from the steading and surrounding properties in the adjacent field to the south east. Given the separation distance between existing properties, the principle of holiday accommodation raises no substantive concerns regarding loss of neighbouring residential privacy and amenity. Details of external lighting will be controlled by condition to minimise potential adverse impact upon the amenity of adjacent properties.
- 8.14 The proposed use will introduce additional activity into the area. However, this is an existing building that could be used commercially without further permissions and it would be unreasonable to expect there to be no activity. Environmental Health indicates that there is potential for noise from operational plant and equipment, i.e. ventilation/refrigeration and odours from the kitchen ventilation system. However, these matters can be controlled by condition. Suitable storage arrangements for the disposal of waste can also be controlled by condition. While not relevant to planning, an Informative regarding the need for compliance with food safety regulations can be placed on any permission granted.

Existing Infrastructure constraints

8.15 A number of planning applications for residential and holiday enterprises within the Ladystone area have been refused in recent years. One of the key reasons for this

relates to the access arrangements; the reliance on the use of the substandard Ladystone Road, the need to cross the weight restricted railway bridge and the safety aspects associated with the inadequate junction arrangement on the A832, particularly with regard to visibility. The ongoing use of the railway bridge and substandard Ladystone Road has been a cause for some concern for local residents and the Community Council who have consistently raised objections to these applications with a call for the road to be adopted. Representations received for this application reference these concerns again.

- 8.16 The Council has no plans to adopt this road. It is not of sufficient standard to do so. Network Rail has regularly objected to any new development on Ladystone Road on the basis that the intensification of traffic flow over the private, weight restricted bridge will increase the safety risk to both rail passengers and road users. While the bridge is entirely safe and meets the standards for the purpose it was built, to provide vehicular access for the landowner, any increase in traffic flows will increase the risk of an accident and vehicle incursion.
- 8.17 Policy 30 Physical Constraints of the Highland-wide Local Development Plan requires developers to consider whether their proposals would be located within areas of constraints as set out in the Physical Constraints Supplementary Guidance. Where a proposed development is affected by any of the constraints detailed within the guidance, developers must demonstrate compatibility with the constraint or outline appropriate mitigation measures. In relation to railway infrastructure, the guidance states that "any new development can potentially pose a risk to the running of the operational railway or impact on existing railway infrastructure such as: bridges; tunnels; embankments; railway access; and level crossings. There are a significant number of level crossings in the Highland Local Authority Area. Development proposals that are likely to result in a significant percentage increase in level crossing use must assess level crossing capacity and potential safety impacts borne from proposals including appropriate mitigation where necessary". As such, development is only permitted if sufficient mitigation measures are in place.
- 8.18 The cumulative impact of adding a 10 unit holiday accommodation development to the existing 18 properties currently using Ladystone Road would lead to an unacceptable increase in vehicles using the level crossing. The overall accumulation of vehicles would be considered a significant percentage increase from those that already have permission to use the level crossing and would not comply with Policy 30.
- 8.19 While the applicant, as owner of the steading, does have legal right of access over Ladystone Road and could currently use this, development of an alternative access and early engagement with Network Rail has resulted in appropriate mitigation to address this constraint. This has allowed Network Rail to not object to this proposal.
- 8.20 Construction traffic, guests and services will be routed to the site via Leachkin Brae utilising the historic Inverness to Blackfold and Abriachan drove road linking onto the existing field access south east of the site. All marketing materials associated with the holiday accommodation shall direct guests to use the upgraded Leachkin Brae/drove road access and will be reinforced by signage at appropriate locations. These matters are to be agreed with Network Rail and the Planning Authority.

8.21 While it is acknowledged that neither the Planning Authority nor the applicant can categorically ensure all visitors to the holiday accommodation use only this agreed route it does provide as much surety as possible. The proposal offers the opportunity for the Planning Authority to retain an element of control over the site prior to proposed changes to Permitted Development Rights that will come into effect in April 2021. This could see potential for conversion of redundant agricultural buildings for up to 5 residential properties and various other commercial uses without the need for planning permission. Any future development considered to be 'Permitted Development' would offer no opportunity to control traffic away from Ladystone Road.

Access Arrangements, Traffic and Road Safety

- 8.22 On the other hand, the ongoing use of Leachkin Brae and the proposed use of the drove road has caused considerable concern for local residents and the Community Council whom have also consistently raised objections to applications for further development in this area. This single track road serves approximately 48 dwellings, a number of businesses including Wester Blackpark Farm, and the Forestry and Land Scotland car park used for the purpose of accessing trails around Craig Phadraig hill and old fort. Only a portion of the single track Leachkin Brae is adopted with limited passing opportunities and no pedestrian footway provision.
- 8.23 There are a number of passing places along the adopted section of Leachkin Brae that require upgrading. Only a short section of the old drove road forms part of the adopted road, with the majority of the proposed access unadopted, substandard and in a poor state of repair; essentially a rough track that joins the Great Glen Way beyond the boundary of the former Craig Dunain hospital estate boundary. This track is well used locally for a mixture of recreational uses with representations noting hill walkers, recreational walkers, dog walkers, joggers and horse riders all making use of the Core Path.
- 8.24 The applicant has "a heritable and irredeemable servitude right of access for all purposes over the old drove road from Inverness to Ladystone" which is evidenced in the legal opinion of Lord Coulsfield in the case in the Court of Session between Lord Burton v Mackay (Case Report: 1995 SLT 507). Nevertheless, the use of this route, in particular Leachkin Brae, presents a number of challenges. Representations question the principle of the use of the drove road access, the capacity of the road to accept additional traffic and road safety particularly where the drove road meets the Great Glen Way.
- 8.25 At full capacity the tourist accommodation will have scope for 20 guests with up to 10 staff. The Transport Planning Team noted that potential traffic generated by the proposal in the Transport Statement has been derived from a TRICS assessment but due to a lack of TRICS survey data the traffic figures are based on 2 sites with no direct compatibility to the 10 unit holiday accommodation proposed. The Transport Statement states the proposal would result in 33 vehicle trips between 07:00 and 22:00 with peak activity of 5 trips each way occurring between 15:00 and 16:00, other peak hours between 08:00 and 09:00 with 3 trips each way occurring and again between 17:00 and 18:00. Although the Transport Planning Team are unable to demonstrate what the actual traffic volumes generated by this development

are likely to be, they consider the figures presented in the Transport Statement to be an under representation. Having said that, on the fundamental issue of principle, the Transport Planning Team has not objected.

- 8.26 The Transport Planning Team has raised a number of matters that will require to be addressed as part of the further application for Matters Specified in Conditions. These include:
 - strengthening of both the carriageway edges along the whole length of Leachkin Brae;
 - upgrade of all 8 passing places on Leachkin Brae to standard size as shown within the Roads and Transport Guidelines for New Developments Supplementary Guidance;
 - all 8 passing places are to be constructed to a carriageway pavement design acceptable to the Transport Planning Team;
 - replacement of passing place signage with new signs, poles and foundations;
 - demonstrate that passing places on Leachkin Brae are currently inter-visible and if not, provide new passing places;
 - upgrade the existing drove road passing places to standard size as shown within the Roads and Transport Guidelines for New Developments Supplementary Guidance, and;
 - provide additional standard size inter-visible passing places on the drove road.

In addition, a Travel Plan is required to outline what measures will be adopted to encourage and promote alternative modes of transport to the site and will be controlled by condition.

- 8.27 Repair works to the passing places were conditioned for previous planning applications at Blackpark; most recently planning permission 17/01277/FUL. In dealing with this application it has become evident that the required repairs have not been implemented and as a result an enforcement case has been logged for this breach of condition. Regardless of the previous lack of repair work the requirements for this application are likely to be more fundamental in order to bring the passing places up to current standards. This along with the other requirements set out by Transport Planning can be achieved by condition. The confirmation of servitude right of access indicates that the applicant is able to carry out the required upgrading works to the drove road.
- 8.28 Additionally, the Transport Planning Team noted that while the Construction Traffic Management Plan submitted is beneficial it has not been able to determine the impact construction traffic will have on Leachkin Brae given the lack of clarity regarding volume/type of construction traffic, proposed upgrading works, mitigation measures and staff arrangements. As such, the developer will be required to submit a Construction Traffic Management Plan, compiled in consultation and agreement with the local Roads Operations Manager. This can be controlled by condition.
- 8.29 The Transport Planning Team noted there is a risk of damage to the Council maintained roads from construction related traffic. In order to protect the interest of the Council, as the Roads Authority, a suitable agreement relating to Section 96 of

- the Roads (Scotland) Act 1984 is required. An appropriate Road Bond or similar security will also be required.
- 8.30 Policy 77 Public Access and 78 Long Distance Routes of the Highland-wide Local Development Plan seek to safeguard and enhance the Core Path network and long distance routes, such as the Great Glen Way (Core Path IN19.17 and IN19.50), and their settings. Routes within the Core Paths Plan shall be retained and enhanced. The Council has a statutory duty to protect access rights under the Land Reform (Scotland) Act 2003, any upgrade to the track/paths as part of a new access will be expected to be usable by the public during and after construction works.
- 8.31 The Great Glen Way is located close to the site and covers a portion of the proposed access (Core Path IN19.17 and IN19.50). The Access Officer was generally satisfied the principle of the proposal complied with Policy 77 Public Access and Policy 78 Long Distance Routes of the Highland-wide Local Development Plan in relation to active travel but requested that a condition be included requiring an Access Management Plan. As part of this, the expectation will be, in the interest of protecting users of the Great Glen Way, that a segregated footpath on that part of the drove road that is currently shared with the Great Glen Way Core Path is provided as part of the upgrade works required to that road.

Flood Risk and Drainage

- 8.32 Concern has been expressed that surface water run-off and flooding is a problem along sections of the proposed access on Leachkin Brae and also on the drove road. The proposal offers the opportunity for further upgrading and improvement works along the route bringing the access up to current standards. Details of this can be controlled by condition.
- 8.33 SEPA is satisfied that the building is not likely to be at medium to high risk of flooding. A minimum buffer strip of at least 6m remains between the top of the bank and the existing redundant steading building. This will allow for natural watercourse migration, will help reduce the impacts of any overtopping as well as ensuring bank stability and adequate watercourse access for maintenance assessment. A condition requiring any new built development to be set back at least 6m from the top of the bank of the watercourse can deal with this issue.
- 8.34 There is sufficient space within the site to provide adequate SUDS surface water drainage and appropriate private waste water treatment. Again, these are issues that will require to be addressed within a subsequent application for Matters Specified in Conditions.

Forestry

8.35 Policy 51 - Trees and Development of the Highland-wide Local Development Plan states that "the Council will support development which promotes significant protection to existing hedges, trees and woodlands on and around development sites". Policy 52 - Principle of Development in Woodland states that "the applicant is expected to demonstrate the need to develop a woodled site and to show that the site has capacity to accommodate the development. The Council will maintain a strong presumption in favour of protecting woodland resources. Development

proposals will only be supported where they offer clear and significant public benefit. Where this involves woodland removal, compensatory planting will usually be required". The proposal will not directly impact on the forest resource. However, there will likely be some loss of trees given the requirement to upgrade the proposed access. Having said that, any tree losses are unlikely to be significant and can be mitigated. The Indicative Site Layout Plan sets out potential for new planting around the car park.

Habitats and Protected Species

- 8.36 As previously stated, there are no natural, built or cultural heritage designations on this site. The steading building, and its environs, have potential for the presence of bats, which are European Protected Species (EPS). A Preliminary Roost Assessment Report was submitted on 18 January 2021. The report compiled was an initial assessment only at this stage given that the time of year is outwith the bat breeding season when the species are most active. It was noted that there is high roost potential for bats with it highly likely a Pipistrelle non-maternity roost is present and less likely that Brown Long-eared bats are present, yet this not conclusive at this stage. The study did not cover hibernating species.
- 8.37 The preliminary report recommends further survey work be carried out between May and September. The survey work is required from 3 separate positions given the size of the building. If roosts are found during this period then a detailed mitigation plan, SNH licencing requirements, scheduling of works, pre-works inspection survey, supervision details, further monitoring etc. will all be required. Additionally, bat boxes are to be installed on the new building and to the mature conifer trees to the south of the steading to act as temporary roosts for any bats found during supervised roofing works. 4 Schwegler 2FN bat boxes will cater for Brown Long-eared bats and 3 Schwegler 1F bat tubes for Common/Soprano Pipistrelle bats. Although not identified at this stage, further mitigation might be required. A planning condition will ensure that the pre-commencement recommendations and mitigation set out within the Preliminary Roost Assessment Report (18 January 2021) has been completed and thereafter adhered to during the construction of development.
- 8.38 The survey also noted the presence of Barn Owls and Swallows within the steading. These species, while not EPS, are nonetheless important species that will need to be managed.

Other material considerations

8.39 There are no other material considerations.

Non-material considerations

8.40 None

Matters to be secured by legal agreement

- 8.41 Road bond Section 96 of the Roads (Scotland) Act 1984.
- 8.42 The applicant has four months from the date that the Council's solicitor writes to the Applicant/Applicant's solicitor indicating the terms of the legal agreement, to deliver

to the Council a signed legal agreement. Should an agreement not be delivered within four months, the application may be refused under delegated powers.

Developer Contributions

8.43 Developer contributions are not required as the new units will be used for tourist accommodation.

9. CONCLUSION

- 9.1 This proposal was always going to have to balance a number of competing interests. The applicant has sought to provide an appropriate level of detail for this Planning Permission in Principle application and, while a significant amount of detail still requires submission through a further application for Matters Specified in Conditions, it has been demonstrated that it is possible to develop this site for holiday accommodation while maintaining appropriate safeguards for the various concerns raised.
- 9.2 The development plan supports tourist accommodation where it can be accommodated without adverse impacts on neighbouring uses and complies with the other policies within the Development Plan. While significant and very relevant concerns have been raised by the Community Councils and local residents, it is considered that the mitigation proposed can address these concerns as well as meet with the requirements set down by the technical consultees. Some of this mitigation will come at considerable expense to the applicant but will also bring with it some wider public benefit. It is considered that the application can be supported.
- 9.3 All relevant matters have been taken into account when appraising this application. It is considered that the proposal accords with the principles and policies contained within the Development Plan and is acceptable in terms of all other applicable material considerations.

Ν

10. IMPLICATIONS

- 10.1 Resource: Not applicable
- 10.2 Legal: Not applicable
- 10.3 Community (Equality, Poverty and Rural): Not applicable
- 10.4 Climate Change/Carbon Clever: Not applicable
- 10.5 Risk: Not applicable
- 10.6 Gaelic: Not applicable

11. RECOMMENDATION

Action required before decision issued Y

Notification to Scottish Ministers

Conclusion of Section 96 Obligation Y

Revocation of previous permission N

Subject to the above, it is recommended that planning permission be **GRANTED** for the following reasons:

Conditions and Reasons

- 1. No development shall commence until the following details shall have been submitted to, and agreed in writing by, the Planning Authority:
 - i. a detailed layout of the site of the proposed development (including site levels as existing and proposed);
 - ii. the design, proposed materials and external appearance of the proposed development;
 - iii. landscaping proposals for the site of the proposed development (including boundary treatments);
 - iv. details of access and parking arrangements; and
 - v. details of the proposed water supply and surface and foul water drainage arrangements.

The development shall thereafter be undertaken in accordance with the agreed details.

Reason: Planning permission is granted in principle only and must be approved prior to development commencing.

2. The holiday accommodation for which planning permission is hereby approved shall not be occupied unless the surface water drainage associated with the development including areas of hardstanding and the driveway, is installed and completed to the satisfaction of the Planning Authority and in accordance with SEPA's guidelines on SUDS. No development shall commence until details of the proposed arrangements referred to in condition 1 have been submitted to, and approved in writing, by the Planning Authority.

Reason: In order to ensure that the site is properly and adequately drained.

3. No development shall commence until details of the method by which foul drainage is to be provided are submitted to, and approved in writing, by the Planning Authority. The development shall not be occupied unless the method by which foul water drainage is to be provided on site has been implemented and completed to the satisfaction of the Planning Authority.

Reason: In the interests of public health.

4. No development shall commence until details of a vehicle turning area within the application site, formed in accordance with The Highland Council's Road Guidelines for New Developments, have been submitted to, and approved in

writing by, the Planning Authority. Thereafter, the turning area shall be provided in accordance with these approved details, prior to the first use of the development, and thereafter maintained as a turning area in perpetuity.

Reason: To ensure that sufficient space is provided within the application site for the parking (and, where necessary, turning) of cars, so they do not have to park within or reverse onto the road.

- 5. Prior to the commencement of development, a scheme to deal with potential contamination within the application site shall have been submitted to, and approved in writing by, the Planning Authority. The scheme shall include:
 - i. the nature, extent and type of contamination on site and identification of pollutant linkages and assessment of risk (i.e. a land contamination investigation and risk assessment), the scope and method of which shall be first submitted to and approved in writing by with the Planning Authority, and undertaken in accordance with PAN 33 (2000) and British Standard BS 10175:2011+A1:2013 Investigation of Potentially Contaminated Sites - Code of Practice;
 - ii. the measures required to treat/remove contamination (remedial strategy) including a method statement, programme of works and proposed verification plan to ensure that the site is fit for the uses proposed;
 - iii. measures to deal with contamination during construction works;
 - iv. in the event that remedial action be required, a validation report that validates and verifies the completion of the approved decontamination measures:
 - v. in the event that monitoring is required, monitoring statements submitted at agreed intervals for such time period as is considered appropriate in writing by the Planning Authority.

No development shall commence until written confirmation has been received that the scheme has been implemented, completed and if required, monitoring measurements are in place, all to the satisfaction of the Planning Authority.

Reason: In order to ensure that the site is suitable for redevelopment given the nature of previous uses/processes on the site.

6. No development shall commence until a Visitor Management Plan, which sets out mitigation measures to limit the use of Overbridge 302/017 and Ladystone Road, has been submitted to, and approved in writing by, the Planning Authority. The approved Visitor Management Plan shall thereafter be implemented from the date of first occupation of any part of the development.

Reason: To reduce the risk of access to the development over Overbridge 302/017 and Ladystone Road.

7. Prior to the commencement of any development, a scheme of works for the upgrading of Leachkin Brae and the drove road to include carriageway and

passing place improvement, shall be submitted to and approved in writing by the Planning Authority in consultation with the Roads Authority. The works required shall be implemented in accordance with the approved scheme, prior to the commencement of development on the application site.

Reason: To provide a safe a suitable access to the application site.

8. All plant, machinery and equipment associated with ventilation, swimming pool, air-conditioning, heating and refrigeration services or similar and including fans, ducting and external openings shall be so installed, maintained and operated such that any associated operating noise does not exceed NR 20 when measured or calculated within any noise-sensitive property with windows open for ventilation purposes.

If the above standard cannot be met, the applicant must undertake an assessment of the noise in terms of BS 4142:2014 Methods for rating and assessing industrial and commercial sound which demonstrates that noise will not have an adverse impact on noise sensitive properties. A report of the assessment must be submitted for the written approval of the Planning Authority.

Reason: In order to safeguard the amenity of neighbouring properties and occupants.

- 9. No development shall commence until details of an odour mitigation system designed to protect neighbouring properties from catering odour arising from this development has been submitted to and agreed in writing by the Planning Authority in consultation with the Environmental Health Authority. The system must be designed and installed by a competent person with specialist knowledge of ventilation and filtration systems. The following information is required;
 - i. a description of the catering operation including adequate site and layout plans/drawings
 - ii. details of the proposed filtration/ventilation plant and equipment with a reasoning for the choice
 - iii. proposed maintenance arrangements

The approved arrangements shall be implemented prior to the first occupation of the development hereby approved.

Reason: In order to safeguard the amenity of neighbouring properties and occupants.

10. No development shall commence until details for the suitable and sufficient off-street storage have been submitted to, and agreed in writing, by the Planning Authority. No refuse or recycling material shall be stored or placed for collection on the public highway or pavement, except on the day of collection. The approved arrangements shall be implemented prior to the first occupation of the development hereby approved

Reason: To ensure that suitable provision is made for the storage of communal waste and recycling bins.

11. No development shall commence until full details of any external lighting to be used within the site and/or along its boundaries and/or access have been submitted to, and approved in writing by, the Planning Authority. Such details shall include full details of the location, type, angle of direction and wattage of each light which shall be so positioned and angled to prevent any direct illumination, glare or light spillage outwith the site boundary. Thereafter only the approved details shall be implemented.

Reason: In order to ensure that any lighting installed within the application site does not spill beyond the intended target area and does not impact adversely upon the amenity of adjacent properties.

12. No development shall take place within 6 metres of any watercourse.

Reason: To ensure that development is carefully managed and does not encroach onto riparian buffer strips. Such buffers strips are required a) for the maintenance of watercourses within the application site, b) to account for natural watercourse migration, and c) in order to safeguard property from flood risk.

13. No development shall commence until a detailed Tree Removal Plan and Compensatory Planting Plan have been submitted to, and agreed in writing, by the Planning Authority. Compensatory planting shall be implemented in full during the first planting season following completion of the upgraded access.

Reason: In the interests of amenity.

14. No development shall commence until a detailed Landscape Plan and maintenance programme have been submitted to, and agreed in writing, by the Planning Authority. The Landscape Plan shall be implemented in full during the first planting season following commencement of development.

Reason: In the interests of amenity.

15. No development or work (including site clearance) shall commence until a photographic record has been made of the building and/or other features affected by the development/work, and the photographic record has been submitted to, and approved in writing by the Planning Authority.

Reason: In order to protect the archaeological and historic interest of the site.

16. No development shall commence until full details of a covered and secure communal bicycle storage/racking have been submitted to, and approved in writing by, the Planning Authority. Thereafter, the storage/racking system shall be installed in accordance with these approved details prior to the first occupation of the development hereby approved.

Reason: In order to facilitate the use of a variety of modes of transport.

- 17. No development shall commence until a detailed Outdoor Access Plan of public access across the site (as existing, during construction and following completion) has been submitted to, and approved in writing by, the Planning Authority. The plan shall include details showing:
 - i. All existing access points, paths, core paths, tracks, rights of way and other routes (whether on land or inland water), and any areas currently outwith or excluded from statutory access rights under Part One of the Land Reform (Scotland) Act 2003, within and adjacent to the application site:
 - ii. Any areas proposed for exclusion from statutory access rights, for reasons of privacy, disturbance or effect on curtilage related to proposed buildings or structures;
 - iii. All proposed paths, tracks and other routes for use by walkers, riders, cyclists, canoeists, all-abilities users, etc. and any other relevant outdoor access enhancement (including construction specifications, signage, information leaflets, proposals for on-going maintenance etc.);
 - iv. Any diversion of paths, tracks or other routes (whether on land or inland water), temporary or permanent, proposed as part of the development (including details of mitigation measures, diversion works, duration and signage).
 - v. Construction method, material specification and drainage details for the construction of a new 2m wide path serving the Great Glen Way parallel to the drove road as to be upgraded.

The approved Outdoor Access Plan, and any associated works, shall be implemented in full prior to the first occupation of the development or as otherwise may be agreed within the approved plan.

Reason: In order to safeguard public access both during and after the construction phase of the development.

18. Public access to any Core Path within, or adjacent to, the application site shall at no time be obstructed or deterred by construction-related activities, unless otherwise approved in writing by the Council's Access Officer as a temporary measure required for health and safety or operational purposes. Under such circumstances, any temporary obstruction or determent shall cover only the smallest area practicable and for the shortest duration possible, with waymarked diversions provided as necessary.

Reason: In order to ensure that access to the Core Path network is not obstructed as a result of this development.

19. No development shall commence on site until a Construction Traffic Management Plan (including a routing plan for construction vehicles) has been submitted to, and approved in writing by, the Planning Authority. The

approved traffic management plan shall be implemented prior to development commencing and remain in place until the development is complete.

Reason: To ensure that an adequate level of access is timeously provided for the development; in the interests of road safety and amenity.

- 20. No other development shall commence until:
 - i. The Carriageway edge is strengthened (both edges) along the whole length of Leachkin Brae;
 - ii. All 8 passing places on Leachkin Brae are upgraded to standard size, as shown on Figure 5.1 of the Councils Roads and Transport Guidelines for New Developments Supplementary Guidance;
 - iii. All 8 passing places on Leachkin Brae are constructed to a carriageway pavement design acceptable to the Roads Authority;
 - iv. Replacement passing place signage locations are agreed with the Roads Authority with new signs, poles and foundations installed;
 - v. The existing passing places on Leachkin Brae are demonstrated to be inter visible and if not, provide new passing places;
 - vi. The existing Drove Road passing places are upgraded to standard size, as per Figure 5.1 of the Councils Roads and Transport Guidelines for New Developments Supplementary Guidance;
 - vii. Additional standard size passing places on the Drove Road are provided, passing places should be inter visible.

Reason: To ensure that an adequate level of access is timeously provided for the development; in the interests of road safety and amenity.

- 21. No development shall commence until a Travel Plan, which sets out proposals for reducing dependency on the private car, has been submitted to, and approved in writing by, the Planning Authority. The Travel Plan shall include:
 - i. Measures for extending and/or increasing the frequency of the existing local bus services(s) and associated financial contributions;
 - ii. Details for the management, monitoring, review and reporting of these measures; and
 - iii. Details of the duration of the Travel Plan.

The approved Travel Plan shall thereafter be implemented from the date of first occupation of any part of the development.

Reason: In order to facilitate the use of a variety of modes of transport.

22. No development shall commence until all pre-commencement recommendations, including further bat surveys, and mitigation set out within the Preliminary Roost Assessment Report (18 January 2021) has been completed and thereafter adhered to during the construction of development.

Reason: To ensure that the site and its environs are surveyed and the development does not have an adverse impact on protected species or habitat.

- 23. No development, including any demolition works, shall commence until a Construction Method Statement has been submitted to, and approved in writing by, the Planning Authority. The statement shall provide for:
 - i. the parking of vehicles of site operatives and visitors;
 - ii. loading and unloading of plant and materials;
 - iii. storage of plant and materials used in constructing the development;
 - vi. measures to control the emission of dust and dirt during construction; and
 - vii. a scheme for recycling/disposing of waste resulting from demolition and construction works.

The approved Construction Method Statement shall be adhered to throughout the construction period.

Reason: In order to safeguard the amenity of neighbouring properties and occupants.

REASON FOR DECISION

All relevant matters have been taken into account when appraising this application. It is considered that the proposal accords with the principles and policies contained within the Development Plan and is acceptable in terms of all other applicable material considerations.

TIME LIMIT FOR THE IMPLEMENTATION OF THIS PLANNING PERMISSION IN PRINCIPLE

In accordance with Section 59 of the Town and Country Planning (Scotland) Act 1997 (as amended), an application or applications for the approval of matters specified in conditions attached to this planning permission in principle must be made no later than whichever is the latest of the following:

- i. The expiration of THREE YEARS from the date on this decision notice;
- ii. The expiration of SIX MONTHS from the date on which an earlier application for the requisite approval was refused; or
- iii. The expiration of SIX MONTHS from the date on which an appeal against such refusal was dismissed.

The development to which this planning permission in principle relates must commence no later than TWO YEARS from the date of the requisite approval of any matters specified in conditions (or, in the case of approval of different matters on different dates, from the date of the requisite approval for the last such matter being

obtained)., whichever is the later. If development has not commenced within this period, then this planning permission in principle shall lapse.

FOOTNOTE TO APPLICANT

Accordance with Approved Plans & Conditions

You are advised that development must progress in accordance with the plans approved under, and any conditions attached to, this permission. You must not deviate from this permission without consent from the Planning Authority (irrespective of any changes that may separately be requested at the Building Warrant stage or by any other Statutory Authority). Any pre-conditions (those requiring certain works, submissions etc. prior to commencement of development) must be fulfilled prior to work starting on site. Failure to adhere to this permission and meet the requirements of all conditions may invalidate your permission or result in formal enforcement action

Flood Risk

It is important to note that the granting of planning permission does not imply there is an unconditional absence of flood risk relating to (or emanating from) the application site. As per Scottish Planning Policy (paragraph 259), planning permission does not remove the liability position of developers or owners in relation to flood risk.

Scottish Water

You are advised that a supply and connection to Scottish Water infrastructure is dependent on sufficient spare capacity at the time of the application for connection to Scottish Water. The granting of planning permission does not guarantee a connection. Any enquiries with regards to sewerage connection and/or water supply should be directed to Scottish Water on 0845 601 8855.

Septic Tanks & Soakaways

Where a private foul drainage solution is proposed, you will require separate consent from the Scottish Environment Protection Agency (SEPA). Planning permission does not guarantee that approval will be given by SEPA and as such you are advised to contact them direct to discuss the matter (01349 862021).

Local Roads Authority Consent

In addition to planning permission, you may require one or more separate consents (such as road construction consent, dropped kerb consent, a road openings permit, occupation of the road permit etc.) from the Area Roads Team prior to work commencing. These consents may require additional work and/or introduce additional specifications and you are therefore advised to contact your local Area Roads office for further guidance at the earliest opportunity.

Failure to comply with access, parking and drainage infrastructure requirements may endanger road users, affect the safety and free-flow of traffic and is likely to result in enforcement action being taken against you under both the Town and Country Planning (Scotland) Act 1997 and the Roads (Scotland) Act 1984.

Further information on the Council's roads standards can be found at: http://www.highland.gov.uk/yourenvironment/roadsandtransport

Application forms and guidance notes for access-related consents can be downloaded from:

http://www.highland.gov.uk/info/20005/roads_and_pavements/101/permits_for_working_on_public_roads/2

Mud & Debris on Road

Please note that it an offence under Section 95 of the Roads (Scotland) Act 1984 to allow mud or any other material to be deposited, and thereafter remain, on a public road from any vehicle or development site. You must, therefore, put in place a strategy for dealing with any material deposited on the public road network and maintain this until development is complete.

Construction Hours and Noise-Generating Activities

You are advised that construction work associated with the approved development (incl. the loading/unloading of delivery vehicles, plant or other machinery), for which noise is audible at the boundary of the application site, should not normally take place outwith the hours of 08:00 and 19:00 Monday to Friday, 08:00 and 13:00 on Saturdays or at any time on a Sunday or Bank Holiday in Scotland, as prescribed in Schedule 1 of the Banking and Financial Dealings Act 1971 (as amended).

Work falling outwith these hours which gives rise to amenity concerns, or noise at any time which exceeds acceptable levels, may result in the service of a notice under Section 60 of the Control of Pollution Act 1974 (as amended). Breaching a Section 60 notice constitutes an offence and is likely to result in court action.

If you wish formal consent to work at specific times or on specific days, you may apply to the Council's Environmental Health Officer under Section 61 of the 1974 Act. Any such application should be submitted after you have obtained your Building Warrant, if required, and will be considered on its merits. Any decision taken will reflect the nature of the development, the site's location and the proximity of noise sensitive premises. Please contact env.health@highland.gov.uk for more information.

Protected Species – Halting of Work

You are advised that work on site must stop immediately, and Scottish Natural Heritage must be contacted, if evidence of any protected species or nesting/breeding sites, not previously detected during the course of the application and provided for in this permission, are found on site. For the avoidance of doubt, it is an offence to deliberately or recklessly kill, injure or disturb protected species or to damage or destroy the breeding site of a protected species. These sites are protected even if the animal is not there at the time of discovery. Further information regarding protected species and developer responsibilities is available from SNH: www.snh.gov.uk/protecting-scotlands-nature/protected-species

Food Safety

The development must comply with the Food Safety (Scotland) Regulations 2006 and the Health and Safety at Work etc. Act 1976. For further advice on this please contact Environmental Health Service on telephone 01349 886603 or email: envhealth@highland.gov.uk.

Damage to the Public Road

Please note that the Council, under Section 96 of the Roads (Scotland) Act 1984, reserves the right to recover all costs for repairing any damage to the public road (and/or pavement) which can be attributed to construction works for this development.

Designation: Area Planning Manager – South

Author: Roddy Dowell

Background Papers: Documents referred to in report and in case file.

Relevant Plans: Plan 1 - Location Plan 904 101

Plan 2 - Indicative Site Layout Plan 904_102 REV A

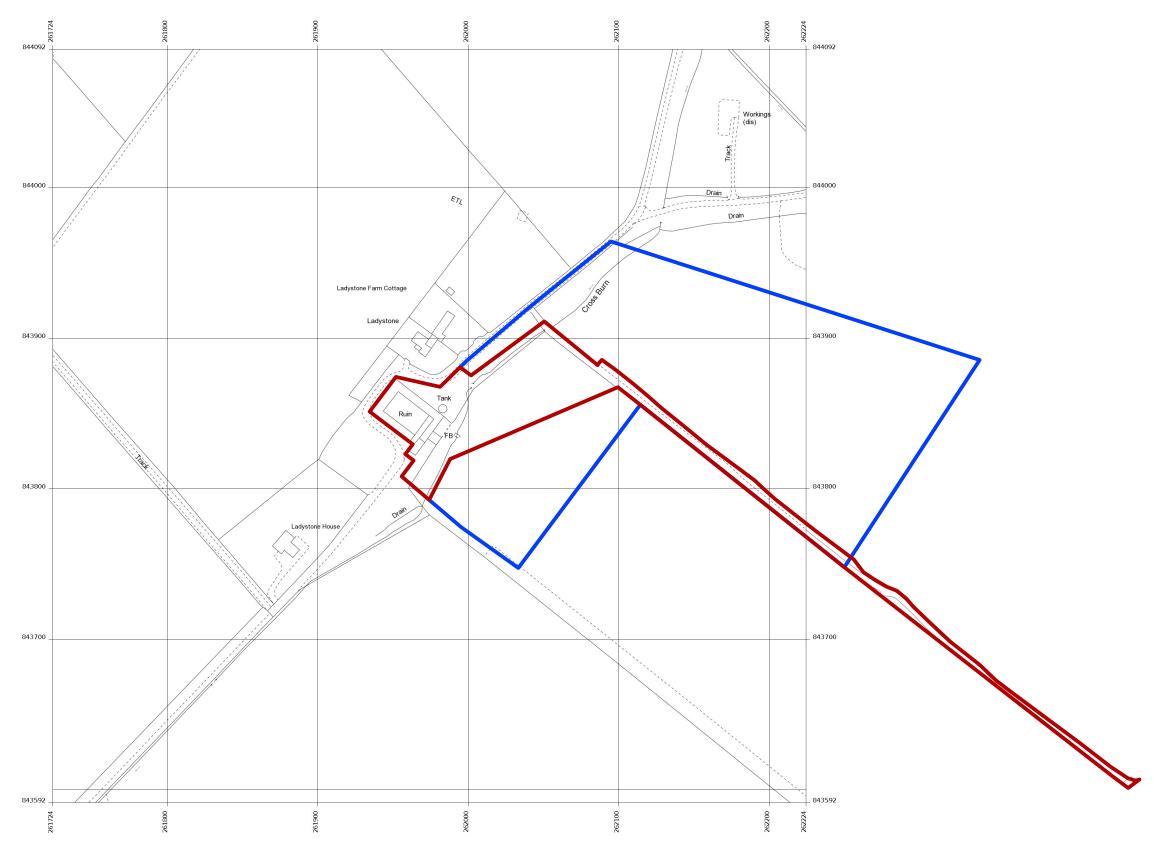
Appendix 2

Other Legal Agreement requirements

Туре	Details
Bond	Section 96 Road Bond to protect against damage to the public road
	Specify the amount to be secured
	Restriction on Bond provider
	4. Set the review date and mechanism for review
	5. Describe the call on circumstances
	6. Any other relevant details

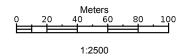






Produced 24 Jun 2020 from the Ordnance Survey MasterMap (Topography) Database and incorporating surveyed revision available at this date.

The representation of a road, track or path is no evidence of a right of way. The representation of features as lines is no evidence of a property boundary.



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Sleat, Isle of Skye IV44 8RQ +44 (0)1471 833 300 Unit 4, Building 5, Templeton Business Centre 62 Templeton Street Glasgow, G40 1DA +44(0)141 550 1401

DRAWING NUMBER 904_101

LOCATION PLAN

DRAWING SET

DRAWING TITLE

PLANNING IN PRINCIPLE

CLIENT 904 LADYSTONE STEADING

DRAWN BY RF / MOC

26/06/2020

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