



24/00314/PPD - CAMPSITE OF 25NO. PITCHES FOR MOTORHOMES PLUS FACILITIES BUILDING. FORM NEW ACCESS TRACKS, IMPROVE EXISTING TRACKS, CREATE NEW PARKING AREA AT CLACHAN SANDS, LOCHMADDY, ISLE OF NORTH UIST

Report by Chief Planner

PURPOSE

- 1.1 The purpose of the Report is to determine whether planning permission should be granted for the development described in the planning application. Since the planning application has received more than six representations, which are considered by the Appointed Officer to be valid and raising material planning considerations, the application cannot be determined under delegation and is presented for decision.

EXECUTIVE SUMMARY

- 2.1 This Report recommends approval of the application for the change of use of land to a campsite with capacity for 25 motorhome pitches and the construction of a facilities building and infrastructure and installation of services associated with the proposed use.
- 2.2 This Report sets out a description of the proposed development, the site and its context together with the advice of consultees and the contributions from the public; this is followed by an assessment of the proposed development against the policies and provisions of the Development Plan and has regard to all relevant material planning considerations.
- 2.3 The key issues raised by the policy assessment are the principle of this type of development in this location; potential impacts on landscape and visual amenity, natural heritage and biodiversity; potential impacts on residential amenity, heritage, roads, flood risk, and climate change.
- 2.4 The planning assessment finds that some mitigation measures are considered necessary to enable the development to proceed satisfactorily. These mitigations can be secured and managed by planning conditions. It is therefore concluded that the provision of a campsite as proposed in this location would, subject to management by conditions, would be acceptable in terms of the Development Plan and having regard to all relevant material planning considerations.

RECOMMENDATIONS

- 3.1 **It is recommended that the application be APPROVED subject to the conditions set out in Appendix 1 to this Report.**

Contact Officer:	Morag Ferguson/Anne Napier Telephone: 01870 604990 Email: mferguson@cne-siar.gov.uk / anne.napier@cne-siar.gov.uk
Appendix 1:	Schedule of Proposed Conditions
Appendix 2:	Plans
Appendix 3:	Consultation Responses
Appendix 4:	Representations
Appendix 5:	Appropriate Assessment under the Habitat Regulations
Background Papers:	None

IMPLICATIONS

- 4.1 The following implications are applicable in terms of the Report.

Resource Implications	Implications/None
Financial	None
Legal	None
Staffing	If approved, future discharge of Planning Conditions, construction stage condition compliance/post construction monitoring.
Assets and Property	None
Strategic Implications	Implications/None
Risk	None
Equalities	None
Corporate Strategy	None
Environmental Impact	None corporately
Consultation	None

BACKGROUND AND PROPOSAL

Background

- 5.1 This detailed application for Planning Permission was registered as valid on 04 October 2024.
- 5.2 This Report sets out an assessment against the policies and provisions of the Development Plan and has regard to all relevant material planning considerations, to inform a conclusion and recommendation as to the determination.

Description of development

- 5.3 The proposed development is for the change of use of land to a campsite with capacity for 25 motorhome pitches. The application also includes the construction of a facilities building and infrastructure and installation of services associated with the proposed use.
- 5.4 The development includes an upgraded main access track from the public road and a separate area of parking for day visitors, in addition to parking spaces provided for campsite users adjacent to the proposed facilities building. The existing footpath access to the beach would be maintained.
- 5.5 This footpath access, the additional parking area, the circulation accesses, motorhome pitches and parking areas within the site would be surfaced with a reinforced mesh laid on top of the vegetative layer. The main access track from the public road to the facilities building would follow the line of the existing track and would be improved as required with a Type 1 compacted gravel finish.
- 5.6 The facilities building would be a relatively modest building of some 12.3m x 7m, with a pitched roof and a ridge height of approximately 4.5m. It would be finished with a profile metal sheeting roof and white roughcast external walls, with vertical timber cladding to the north elevation (facing the coast). The facilities building would contain toilets and showers, including an accessible wet room; laundry facilities and a drying room; two storage rooms; and a small reception/office.
- 5.7 Surface and foul water drainage is proposed to be located adjacent to the facilities building, with treatment on site and an outfall to the foreshore. A greywater disposal point would be incorporated as part of this drainage provision. In addition, a separate chemical toilet disposal unit and associated sealed holding tank would also be provided.
- 5.8 The site is proposed to have a standard height post and wire fenced boundary (as required under caravan site licensing) with gated access to the east for access to the adjacent farmland. The access to

the site would pass over a cattle grid between the old cemetery and the proposed additional parking area.

Description of Site and its context

- 5.9 The application site (the site) extends to 1.06 ha (approx. 2.6 acres) and forms part of the Atlantic coastal edge of predominantly machair grassland. The land around the proposed campsite is actively farmed and used for grazing for cattle and is under cultivation in the spring and summer.
- 5.10 The site comprises predominantly consolidated sandy soil with machair grass vegetation. The land rises up from the cattle grid entrance to the south east of the site, with the access track passing between areas of higher land, before gradually falling away again. The main area of the proposed camp site would be enclosed by two areas of higher land to the south and west, with the site itself gently undulating, for the most part following the natural contours of the land, with the facilities building proposed to be sited within an area of flatter land, towards the centre of the site.
- 5.11 The site is on the edge of the rural settlement of Clachan Sands, located to the north of the Isle of North Uist. There are no existing buildings within the site, and it has been used informally for leisure for many years, including for caravanning and camping.
- 5.12 The site would continue to be accessed from the public road to the east of the site, which also serves the nearby cemetery and the old cemetery. The site has no immediate neighbouring buildings, with the nearest dwellings being situated closer to the junction with the main B893 (Trumisgarry to Berneray) road, with one dwelling also located adjacent to the proposed means of access to the site. A number of other residential properties are located within the vicinity of the proposal, but at greater distances.
- 5.13 The site is situated some distance from the nearest heritage assets, which are two Category C listed thatched cottages, approximately 1 km to the south of the site. Further, beyond these cottages, lies the Category B listed Trumisgarry Telford Church and Category C listed (Category B as a group) associated Manse. To the north-east of the site is the Category C listed Newton House. The two cemeteries are considered to be non-designated heritage and cultural assets. Due to its machair location, the Comhairle Archaeology Service considered the site to have potential for archaeological interest.
- 5.14 The site sits within an area identified as Machair Landscape Character Type within the NatureScot Landscape Character Assessment 2019. The site is within the South Lewis, Harris and North Uist National Scenic Area (NSA).
- 5.15 The site lies within the Machairs Robach and Newton Site of Special Scientific Interest (SSSI), the North Uist Machair Special Areas of Conservation (SAC), and the North Uist Machair and Islands Special Protection Area (SPA).
- 5.16 The land is located outwith (but close to) land identified as at risk of flooding (including future flood risk) in the SEPA Flood Maps.
- 5.17 The Hebridean Way footpath is situated some distance to the east of the site, with the route following a north-south trajectory on the far side of the summit of Beinn Mhòr. The Hebridean Way cycle route is located on the main B893 (Trumisgarry to Berneray) road.

Variations made prior to determination

- 5.18 Responsive changes were made to the proposed development to:

- relocate the area of additional parking and reduce the number of spaces, with the use of reinforced matting for the parking area;
- make revisions to the layout of the pitches;
- re-site a turning head further back from the coastal edge;
- remove the separate footpath provision from the additional parking area;
- confirm that all secondary access tracks would be surfaced with reinforced matting, with the use of a no-dig construction method for all works, with the exception of the pitches requiring levelling, where any excavation works would be kept to a minimum;
- identify the location and type of boundary enclosure for the campsite;
- confirm the dimensions of the proposed facilities building;
- include a passing place within the access track; and
- confirm the proposed location of external lighting and bin storage provision within the site.

5.19 The majority of the changes to the originally submitted scheme were made in response to comments received from NatureScot, to minimise the impact of the proposal on the natural environment.

5.20 Following receipt of the revised details, the application was subject to further consultation and publicity, including a further period for public comment.

Environmental Impact Assessment Regulations (EIA)

5.21 The proposed development was considered in relation to Schedule 2 of The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017, Column 1, Category 12(e) – Permanent camp sites and caravan sites. The site is located within a defined Sensitive Area (NSA, SPA, SAC and SSSI). As a result, it was necessary to screen the proposed development under the EIA Regulations. The result of the screening opinion assessment determined that the development does not constitute Environmental Impact Assessment (EIA) development.

Habitats Regulations – Appropriate Assessment

5.22 An Appropriate Assessment (AA) under the Habitats Regulations Appraisal process has been undertaken for the proposal (see Appendix 5 to this Report). For the reasons set out within the AA, it was concluded that there would be no likely significant effects on (for the SPA) wintering purple sandpiper and turnstone, wintering barnacle geese, breeding corncrake, and (for the SAC) annual vegetation of drift lines, Atlantic salt meadows, humid dune slacks, shifting dunes, naturally nutrient-rich lakes or lochs which are often dominated by pondweed, and slender naiad.

5.23 Likely significant effects were found in relation to (for the SPA) wintering ringed plover, breeding oystercatcher, breeding redshank, breeding dunlin, breeding ringed plover and (for the SAC) machair and fixed dry dune. However, following detailed assessment, the AA concludes that the effect on the integrity of the sites can be avoided with mitigation.

5.24 The identified mitigation would require:

- an access plan to be agreed, which would include provision for signage and face-to-face engagement with campsite users, to promote responsible access to the site, in line with the provisions of the Scottish Outdoor Access Code, and
- the submission and approval of a grassland management plan, to implement a grazing/mowing regime to promote wildflowers.

5.25 These are matters that could be secured by planning condition.

PLANNING HISTORY

- 6.1 Ref 24/00314/SCR_L - Campsite of 25no. pitches for motorhomes plus facilities building. Form new access tracks, improve existing tracks, create new parking area – Not EIA development.

PLANNING HIERARCHY/PRE-APPLICATION

- 7.1 In terms of the Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009, the class and scale of development is such that it falls within the classification of a 'Local Development', therefore the applicant was not required to undertake any formal pre-application consultation with the local community.

POLICY CONTEXT

The Development Plan

- 8.1 In Scotland, the planning system is 'plan-led' and sections 25 and 37(2) of the Town and Country Planning (Scotland) Act 1997 (the Act) require that planning decisions be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 8.2 The statutory Development Plan for the administrative area of Comhairle nan Eilean Siar is comprised of [National Planning Framework 4 \(NPF4\) \(2023\)](#) and the [Outer Hebrides Local Development Plan \(LDP\) 2018](#) and its supplementary guidance. Section 24(3) of the Act provides that in the event of any incompatibility between a provision of NPF4 and a provision of the LDP that whichever of them is the later in date, is to prevail.
- 8.3 The Development Plan policies with particular relevance to the application are:

NPF4:

- Policy 1 – Tackling the climate and nature crises
- Policy 2 – Climate mitigation and adaptation
- Policy 3 – Biodiversity
- Policy 4 – Natural places
- Policy 5 – Soils
- Policy 7 – Historic assets and places
- Policy 10 – Coastal development
- Policy 14 – Design, quality and place
- Policy 22 – Flood risk and water management
- Policy 29 – Rural development
- Policy 30 – Tourism

OHLDP

- Policy DS1: Development Strategy – Rural Settlement/ Outwith Settlement
- Policy PD1: Placemaking and Design
- Policy PD2: Car Parking and Roads Layout
- Policy PD4: Zero and Low Carbon Buildings
- Policy ED3: Caravans, Huts and Temporary Buildings
- Policy EI 1: Flooding
- Policy EI 2: Water and Waste Water
- Policy EI 4: Waste Management
- Policy EI 5: Soils
- Policy EI 6: Coastal Erosion
- Policy NBH1: Landscape
- Policy NBH2: Natural Heritage

- Policy NBH4: Built Heritage
- Policy NBH5: Archaeology

OHLDP Supplementary Guidance
[Caravans, Huts and Temporary Buildings \(November 2021\)](#)

Other Relevant National Guidance

[Developing with nature guidance](#)
[HES-Managing Change in the Historic Environment: Setting](#)

CONSULTATIONS

- 9.1 Statutory consultation was undertaken as required by Regulations. The detailed response of statutory and other consultation bodies can be viewed at Appendix 3 to this Report but is summarised as follows:

Scottish Water

- 9.2 Scottish Water has no objection to the planning application. There is a public water supply in the area but no public wastewater infrastructure. There are no Scottish Water drinking water catchments or water abstraction sources designated as Drinking Water Protected Areas in the area affected by the proposal.

NatureScot

- 9.3 Summary
- North Uist Machair & Islands SPA and North Uist Machair SAC - This proposal could be progressed with appropriate changes. However, because it could affect internationally important natural heritage interests, we object to this proposal unless it is made subject to conditions detailed in our appraisal.
 - We acknowledge the significant changes the applicant has made to this application to ensure that environmental impacts are minimised and the wider crofting practices on the remaining land which helps to maintain important habitats and species associated with the overlapping designated sites.
 - We also recognise the positive benefits that a formal campsite will bring to this area which is currently subject to the impacts of wild camping. There are no public facilities available for campers at present with the nearest public WCs/shower facilities and chemical toilet disposal point is at the ferry terminal on Berneray.

Comhairle Environmental Health Service

- 9.4 The proposed development will require a licence under the terms of the Caravan Sites and Control of Development Act 1960. Discrepancy in plans and absence of details of waste storage provision, external lighting etc noted *[addressed by revisions]*.

Comhairle Building Standards

- 9.5 A building warrant is required for the drainage provision.

Comhairle Archaeology Service

- 9.6 Required pre-determination investigation works. The resulting Evaluation Report has been reviewed, and the Archaeology Service is content with its conclusions. No further mitigation is recommended, including in relation to the revised proposals.

Comhairle Engineering (Roads, Flood Risk and Coastal Erosion):

- 9.7 Formalising the camp site area will help ensure that the site is managed in a responsible way.

- 9.8 Advice provided on signage for parking and access to the beach, to minimise traffic on dunes which could exacerbate erosion. No objections to the proposal as revised, the introduction of a passing place is welcome, and the parking area would be a valuable addition.

PUBLIC PARTICIPATION

- 10.1 The application was advertised for public comment in the public notices section of the Stornoway Gazette in the publications dated 10 October 2024 and 06 March 2025.

- 10.2 No notifiable neighbours exist, as specified by regulation.

- 10.3 Representations were received in relation to the application. Many raised similar issues and to avoid repetition the matters have been summarised and considered on an issue-by-issue basis. The issues relevant to planning are addressed in the Appraisal section of this Report, while the details of the representations are contained in Appendix 4 to this Report. The key issues can be summarised as follows:

- Short-sighted and irresponsible development
- Excessive scale, which goes beyond that required to address current unregulated camping and the consequent environment impacts
- Contrary to the policies of the Supplementary Guidance on Caravans, Huts and Temporary Buildings
- Siting and design would not respect cherished character and amenity of this special place
- Unacceptably obtrusive in the landscape and detrimental to the visual qualities of the area
- Significant increase in footfall, with consequent impacts on natural environment
- Will lead to increased demand for camping
- Will contribute to over-tourism in the Western Isles
- Inappropriate location adjacent to the coast
- Harmful impacts on nature conservation and biodiversity, including ornithology
- Inadequate environmental assessment
- Lack of evidence of sustainable management proposals
- Absence of identified measures to enhance biodiversity
- Desecration of cultural heritage
- Lack of climate impact assessment, including in relation to sea level rise
- Adverse impact on coastal erosion and flood risk
- Noise, disturbance and pollution impacts, including light pollution and drainage
- Adverse impacts on local businesses
- Detrimental impact on local road network, including for cyclists and pedestrians
- Detrimental impact on beach accessibility for those with disabilities
- Removal of public access to the beach/headland
- Queries about the facilities proposed
- Lack of signage
- Impacts on residential amenity
- Lack of local economic benefit from campervan visitors
- No significant job creation or income generation
- Consideration of alternative development proposals
- Concerns at the assessment methodology for the proposal
- Restrictive conditions recommended to prevent construction works between March-August and require signage to be erected
- Lack of pre-application community engagement
- Lack of publicity about the application
- No opportunity to comment on the application

OTHER STATEMENTS SUBMITTED

- 11.1 **Design Statement** – includes a site and area appraisal, design principles, analysis, design concepts and design solutions. The Statement explains that the proposed campsite is orientated to face north, to capture the views of the nearby islands. The campsite would be fenced off, as the adjacent machair land will be used for cropping and grazing. The proposed development area of the campsite is positioned discreetly, where it will be out of view from surrounding houses and the main road, therefore not disturbing the current scenic view. This design was intended to ensure campsite privacy without disturbing the natural beauty of the area.
- 11.2 Each of the 25 pitches is to be landscaped and have terram matting added, to reduce the erosion of the machair land. There will be 12 pitches that will have electrical hookup, located closer to the facility block. The remaining 13 pitches would have the optional use of a solar panel, to encourage the use of renewable energy.
- 11.3 There will be a cattle grid before entering the campsite. Once over the cattle grid, there will also be a boom barrier for the campsite users to go through. The boom barrier can be powered by solar energy and users can open the barrier using their mobile phones. This will be used more early in the morning and late at night. It will mostly be open during the day while staff are at the campsite.
- 11.4 The site currently does not have mains power; therefore, a new installation will be required for the proposed development. The number of poles required to facilitate the installation of the power to the campsite has decreased from the initial design and now includes most of the cable going underground to the campsite to avoid impacting on the scenic landscape.
- 11.5 **Archaeological Evaluation Report** - a programme of archaeological mitigation, including trial trenching, was undertaken in advance of the proposed development of the site, following a pre-application identification of the site as archaeologically sensitive. Eleven separate evaluation trenches were excavated. Only deep deposits of sterile windblown sand and occasional outcropping bedrock was identified. No archaeological features or deposits were noted. No further monitoring or trial trenching is suggested.

PLANNING APPRAISAL

Principle of Development – Development Strategy, Rural Development, Tourism

- 12.1 The policy intent of NPF4's Policy 29 - Rural Development is to encourage rural economic activity, innovation and diversification whilst ensuring that the distinctive character of the rural area and the service function of small towns, natural assets and cultural heritage are safeguarded and enhanced.
- 12.2 In relation to NPF4, the site sits within a defined Remote Rural area. Policy 29 states that development proposals in Remote Rural areas, where new development can often help to sustain fragile communities, will be supported where the proposal will support local employment; supports and sustains existing communities; and is suitable in terms of location, access, siting, design and environmental impact.
- 12.3 In terms of Policy DS1 - Development Strategy of the Outer Hebrides Local Development Plan (OHLDP) the development is on the coastal edge of the Rural Settlement of Clachan Sands. The principal policy objective of Rural Settlements is to accommodate development to meet sustainable growth for local needs, particularly for residential, agriculture, tourism and service activities. Economic development proposals will be supported provided they are of an appropriate scale and do not threaten residential amenity. Amongst other matters, the siting and design of proposals should be appropriate to the established rural character of the individual settlement.
- 12.4 The boundaries of Rural Settlements are not defined in the Local Development Plan. Given the site's position on the coastal edge of the settlement, it is acknowledged that it could be considered to be in

an Outwith Settlement location. The principal objective of Policy DS1 for such locations is to direct appropriate resource based activity and ensure development has a quality of siting and design suitable to a more open and rural setting. Development proposals for non-residential uses on green field sites must demonstrate a clearly justified need for the proposed development in that location. All development proposals will be assessed against the capacity of the surrounding landscape to accommodate the development. Development proposals should avoid raised or high level locations to minimise visual impact.

- 12.5 NPF4 Policy 30 – Tourism’s intent is to encourage, promote and facilitate sustainable tourism development which benefits local people, is consistent with net zero and nature commitments, and inspires people to visit Scotland. Proposals for tourism related development are required to take into account the contribution made to the local economy; compatibility with the surrounding area in terms of the nature and scale; impacts on communities, for example by hindering the provision of homes and services for local people; appropriate management of parking and traffic generation; accessibility for disabled people; measures taken to minimise carbon emissions; and opportunities to provide access to the natural environment.
- 12.6 OHLDP Policy ED3: Caravans, Huts and Temporary Buildings requires development for caravan sites to comply with the Caravans, Huts and Temporary Buildings Supplementary Guidance (SG). The SG identifies tourism as a key and growing sector of the economy of the Outer Hebrides. The aim of this policy is to facilitate growth in this sector through sensitive and unobtrusive development without compromise of the amenity and environment of the islands. It also notes that a significant increase in the number of visitors coming to the islands in recent years has brought new infrastructure challenges and development should enable visitors to dispose of their waste responsibly and reduce risks of environmental pollution.
- 12.7 SG Policy 2: Holiday Caravans and Policy 2B: Touring Caravan and Camping Sites include a number of requirements to minimise impacts on the environment and local amenity. The proposal will be assessed in relation to these requirements and those identified above in the remainder of this Report below.
- 12.8 In terms of comments from consultees on the principle of the proposal, Comhairle Engineering (Roads, Flood Risk and Coastal Erosion) consider that formalising the camp site area will help ensure that the site is managed in a responsible way. NatureScot recognise the positive benefits that a formal campsite will bring to this area, which is currently subject to the impacts of wild camping. They comment that there are no public facilities available for campers at present, with the nearest public WCs/shower facilities and chemical toilet disposal point at the ferry terminal on Berneray.
- 12.9 A number of contributors have objected to a campsite in this location, on the coastal edge within a machair landscape, and referred to the scale of development proposed. Several contributors express strong concern at the potential environmental and social consequences of the development and indicate the perceived limited economic benefits that would result from the proposal.
- 12.10 The likely environmental and social impacts will be considered further below. In terms of likely economic impacts, the potential viability of the development is largely a matter for the developer. The Development Plan policies recognise the importance of sustainable tourism development to the local economy. In this particular case, the provision of a formal campsite of 25 motorhome pitches is considered likely to make a limited but positive contribution to the local economy through the use of local services and facilities, such as shops, restaurants, cafes, museums and other visitor destinations.
- 12.11 A campsite is inherently likely to be located in a rural area and, in this particular case, the site has been in informal leisure use for camping and caravanning for some considerable time. As a result, much of the area within the proposed campsite is not as ecologically sensitive as other areas nearby and, compared to the agricultural land within the remainder of the farm, is also less productive. There are

no other campsites within the local vicinity and there is a clear demand for this type of facility within the area, as evidenced by the long-term informal use of the site.

- 12.12 Consequently, subject to the assessment of environmental and other impacts below, it is considered that the provision of a formal campsite with WC/shower and waste disposal facilities would make a modest but valuable addition to the overall tourism offer within the local area, and the location of the site would accord with national and local planning policies, including the development strategy and policies on rural and tourism development.

Landscape and Visual Amenity

- 12.13 NPF4 Policy 4 seeks to protect, restore and enhance natural assets, making best use of nature-based solutions. Amongst other matters, it confirms that development proposals that will affect a National Scenic Area (NSA) will only be supported where either the objectives of designation and the overall integrity of the areas will not be compromised, or any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.
- 12.14 OHLDP Policy NBH1 requires development proposals to relate to the specific landscape and visual characteristics of the local area, ensuring that the overall integrity of landscape character is maintained. It also requires the Western Isles Landscape Character Assessment (LCA) to be taken into account in determining applications. Development proposals should not have an unacceptable significant landscape or visual impact. If it is assessed that there will be a significant landscape or visual impact, the applicant will be required to provide mitigation measures demonstrating how a satisfactory landscape and visual fit can be achieved. Requirements for development that affect a NSA reflect those of NPF4 Policy 4.
- 12.15 The comments received from NatureScot indicate that it is judged that the proposed development would have minor landscape and visual impacts within the local area and will not compromise the integrity of the South Lewis, Harris and North Uist National Scenic Area or the special qualities for which it has been designated.
- 12.16 In addition, based on data from other campsites on Uist, NatureScot have assessed likely occupancy rates during the season. This indicates that in the month of April, average occupancy is 50%. Occupancy tends to be full in May and July. In August, campsites operate at a mean occupancy rate of 80%, with September occupancy rates falling back to an average of 50%. Outwith these months, the campsite would be closed.
- 12.17 Several contributors have strongly objected to the potential impact of the proposal on the landscape character of the area, including the NSA, and its impacts on visual amenity, the natural beauty of the area and the special qualities of the site, including in relation to light pollution.
- 12.18 The extent of built development proposed would be relatively modest and consist of the facilities building. There is an existing track serving the site, which would be surface dressed as required. The remainder of the accesses within the site, and the pitches themselves, would be surfaced with reinforced matting which would be laid over the vegetation. Ten of the proposed pitches (to the west of the site) would require some regrading to provide a level pitch. With the exception of these pitches, and the construction of the facilities building and drainage requirements, no excavation is proposed.
- 12.19 The erection of the facilities building and the occupation of the campsite pitches by motorhomes would clearly have an impact on the local landscape character and visual amenities of the area. The development would be particularly visible from the north, both from the shore and in transitory views from the B893 road. However, due to scale and type of development proposed, local topography and levels of the site in relation to the higher areas of land to the south and south-west, longer distance and wider views of the site would be limited. The site is largely screened from views from the south,

west and east, including from nearby residential properties. It is also intended that the remainder of land around the site would continue to be actively farmed.

12.20 Further, the impacts on landscape character and visual amenity would be largely intermittent and seasonal as, in the absence of occupied pitches, the facilities building would be the main visible indication of the development. The scale of the development is not considered excessive in relation to the overall size of the site, with the proposed pitches carefully positioned within the site to reflect the existing contours of the land and to minimise the extent of excavation required. Whilst the motorhomes would be visible from the north, they would be largely seen in this context and against a backdrop of higher undeveloped land.

12.21 In addition, the site has been used informally for a similar use for some considerable time. Whilst not formally consented, the impacts of this long-established existing use are not dissimilar to those that would result from the proposal, which would lessen the extent of change to landscape character that would result from the development proposed. However, the provision of external lighting would have the potential to increase the visual impacts of the proposal. For this reason and having regard to the sensitive location of the development, it is recommended that this matter be controlled by condition.

12.22 For these reasons and taking into account the comments of NatureScot, it is considered that the effect of the proposed development on landscape character and visual amenity would be acceptable, and it would not compromise the integrity of the NSA or the special qualities for which it has been designated.

Placemaking and Design, Residential Amenity

12.23 OHLDP Policy PD1 seeks to ensure that proposals demonstrate a satisfactory quality of place-making, siting, scale and design that respect and reflect positive local characteristics and will complement or enhance the surrounding built and natural environment. Neighbour amenity is a consideration and siting, design and boundary treatments should ensure that reasonable neighbour amenity is retained.

12.24 NPF4 Placemaking takes a wide-reaching view on achieving successful places and seeks that development proposals be designed to improve the quality of an area, whether in urban or rural locations and regardless of scale.

12.25 There were no specific comments from consultees in relation to placemaking, design and residential amenity.

12.26 Objections were raised by contributors in relation to potential noise and disturbance impacts, and adverse effects on residential amenity.

12.27 There would be no or very limited intervisibility between neighbouring dwellings and the development site, due to the local topography and the separation distances involved. For similar reasons, the proposed development is considered unlikely to result in harm to the amenity or living conditions of nearby occupiers from noise and disturbance, and no objections have been raised by the Comhairle Environmental Health Service in these respects.

12.28 One dwelling is located immediately adjacent to the junction of the township road with the main B893 road, which would provide access to the site. However, this road also serves the existing and old cemeteries and is used by the existing users of the site. As such, the change in traffic generation likely to result from the proposal is considered likely to be limited and not materially significant in relation to likely impacts on residential amenity.

12.29 As referred to above, the extent of built development proposed would be very limited. The facilities building would be relatively modest in size and the external finishes of white roughcast and vertical timber cladding to the walls, and profiled metal sheeting would reflect the wide range of materials that

exist within the local area. Viewed from the coast, the building would be recessive and, overall, the design of the building is considered to be appropriate for the location.

- 12.30 Consequently, it is considered that the sensitive siting, scale and careful design of the proposed development would acceptably respect the characteristics of the area and result in a satisfactory quality of place, which would not detract from the surrounding natural environment or result in harm to neighbour amenity.

Natural Heritage and Biodiversity

- 12.31 NPF4 Policy 3 seeks to protect biodiversity, reverse biodiversity loss, deliver positive effects from development and strengthen nature networks. It requires development proposals to contribute to the enhancement of biodiversity. The policy requires any adverse impacts, including cumulative impacts, to be minimised through careful planning and design. Developments should conserve, restore and enhance biodiversity, in accordance with national and local guidance. Measures should be proportionate to the nature and scale of development.
- 12.32 OHLDP Policy NBH2 Natural Heritage outlines the requirements of the Habitat Regulation Appraisal (HRA) process for European [Natura] sites and indicates that development will generally only be permitted where, amongst other matters, the Appropriate Assessment (AA) has demonstrated that it will not adversely affect the integrity of the site. The policy also sets out the criteria against which development that affects a Site of Special Scientific Interest (SSSI) will be assessed. The policy also requires development proposals to avoid having a significant adverse effect on, and where possible to enhance, biodiversity and ecological interests of the site.
- 12.33 As detailed above, an Appropriate Assessment has been undertaken in relation to the proposed development. This drew on detailed analysis undertaken by NatureScot and concluded that, subject to mitigation, the proposal would not adversely affect the integrity of the SPA and SAC or their respective qualifying features.
- 12.34 NatureScot has produced 'Developing with Nature' standing advice guidance to support the implementation of policies on biodiversity. It is aimed at those making local developments; however, it contains universal advice for development and the integration of nature-based solutions providing multiple benefits. As well as addressing the causes of climate change and supporting biodiversity, it benefits people and enhances our places.
- 12.35 In addition to these policy requirements, there are also statutory duty obligations placed on local authorities and decision makers in relation to biodiversity, protected species, and birds, amongst other matters.
- 12.36 In addition to the standing advice, NatureScot has provided detailed comments on the proposal, which are summarised above and reproduced in Appendix 3 of this Report. In brief, they consider that the proposal is likely to have a significant effect on breeding ringed plover, dunlin, oystercatcher, redshank and wintering ringed plover designated within the SPA. However, adverse effects on site integrity can be avoided with the requirement for an access plan to be agreed, to promote responsible access.
- 12.37 Further, they also consider the proposal is likely to have a significant effect on machair and dune grassland features designated within the SAC, but that the proposal would not adversely affect the integrity of the site. However, they strongly recommend that the remaining undeveloped areas of grassland within the red line site boundary are managed to ensure that plants can continue to flower and set seed. This should be done through the submission of a grassland management plan, which would also help contribute to the biodiversity enhancement requirements of NPF4 Policy 3.
- 12.38 Strong objections have been raised by contributors in relation to the likely impact of the proposal on the natural environment, including protected species, ornithology, habitat and biodiversity. The RSPB

has also commented on the proposal indicating, amongst other matters, that they consider the development would have an impact on corncrake and breeding waders.

- 12.39 Having regard to the specialist advice of NatureScot, it is noted that Breeding Ringed Plover, Dunlin, Oystercatcher and Redshank have been recorded nesting in the wider area of the SPA. It is understood that ground nesting birds, such as breeding waders, can be sensitive to human activity. It is recognised that the proposed development is likely to result in higher numbers of people using the campsite during the breeding season and, as a result, potentially accessing the wider SPA, as campsite users explore the area.
- 12.40 Higher levels of irresponsible access during the breeding season have the potential to disturb breeding waders, causing nests to fail and/or to exclude birds from areas of breeding habitat. Over consecutive breeding seasons, such disturbance is likely to have an adverse effect on site integrity for breeding waders. In addition, Wintering Ringed Plover can be feeding on the intertidal zone in months during the operational period for the campsite. The proposed development is considered likely to bring more visitors to the beaches, which would increase disturbance, particularly if visitors have pet dogs.
- 12.41 However, in comparison to the number of visitors currently attracted to the area, the likely increase in visitors which would occur as a result of this proposal, whilst significant, would be comparatively small. Further, during the period the campsite will be operational, opportunities for wintering waders to feed would be good, as day length would be significantly longer. Early morning and late evening will see less visitor activity and would provide periods when birds can feed undisturbed. In addition, while levels of disturbance for wintering waders are likely to be relatively low, the provision of a satisfactory Access Plan, with appropriate signage and face-to-face engagement would help reduce these further.
- 12.42 In relation to the concerns raised in respect of corncrake, NatureScot have confirmed that data from the last 5 years (2019-2023) shows that the nearest calling male has been more than 300m from the red line boundary of the application site. Considerably older data, from 2005, indicates the presence of a calling male at just over 100m from the site. However, the development does not overlap with corncrake habitats and the locations where corncrake are located within the wider area mean that they are unlikely to be disturbed by users of the campsite. In addition, the extent of construction works proposed is limited, corncrake are known to be tolerant of noise levels, and the vegetation across the remainder of the application site is generally short.
- 12.43 In relation to the proximity of breeding waders to the access track, the access track to the site is existing and is used as a main access to the remaining adjacent farmland. As such, notwithstanding the concerns expressed by the RSPB and others, it is considered that the proposal would have no likely significant effects on corncrake and the impacts on breeding waders can be appropriately mitigated without the need to restrict the timing of construction works. Such a measure would be unnecessarily restrictive given the very low risk of an adverse effect in this regard.
- 12.44 Overall, it is considered that the recommended provision of an agreed Access Plan, as outlined above, would be sufficient to adequately address the impacts likely to result from the development on the SPA and its qualifying features. This is a matter that can be satisfactorily secured by condition.
- 12.45 In relation to the machair and dune grassland features designated within the SAC, the total application site area is 10,600m², made up of existing track, areas that will remain as permanent grassland and newly developed areas. The newly developed areas are estimated to be 3,815m² (0.38 hectares) and it has been assumed that these areas will be permanently lost. As such, the percentage of dune grassland and machair grassland lost relative to the total resource of these habitats throughout the SAC is 0.043% and 0.011% respectively.
- 12.46 In comparison to the overall resource of these habitats within the SAC, the proportion of habitat lost would be very small. Furthermore, approximately half of the pitches, and the areas proposed for the

parking area and the facilities building, have been regularly used by motorhomes and day trippers. This has resulted in compaction of the ground, which has altered the grassland habitats and reduced their quality. Considering the small level of loss, the lower quality of the majority of the proposed area, and the potential for compacted areas outwith this to recover, it is considered that the proposal will not have an adverse effect on the integrity of the machair and dune grassland features of the SAC.

- 12.47 However, whilst it is considered that the proposal will not have an adverse effect on site integrity, having regard to the comments of NatureScot in this respect, it is recommended that the remaining areas of grassland within the application site boundary are managed, to ensure that plants can continue to flower and set seed. This can be achieved through the provision of an agreed grassland management plan, which can be secured by condition.
- 12.48 In relation to the concerns raised by some contributors concerning the presence of otter, no substantive evidence has been provided, or was observed, such as evidence of spraints, couches, holts or runs, to indicate that otters are utilising the development site. There are no drains or other waterways crossing the site for otters to use. However, it is acknowledged that it is not uncommon to see otters come ashore with prey or cross a beach; the latter is more likely where fresh water runs into the coast, such as is the case slightly further north along the coast. Otters are common within the wider area, but with ample suitable habitat such that the proposal is considered unlikely to result in disturbance.
- 12.49 Overall, it is considered that the minimal groundworks, use of mesh reinforcement over grass pitches, appropriate grassland management and the implementation of an Access Plan, would contribute to the restoration and enhancement of biodiversity, in compliance with relevant policies. Therefore, subject to the identified mitigation measures, it is considered that the development would not have an unacceptable impact on natural heritage and biodiversity, including ecology and ornithology, and would not be likely to adversely affect any protected species.

Cultural Heritage

- 12.50 NPF4 Policy 7 seeks to protect and enhance the historic environment, assets and places, and to enable positive change as a catalyst for the regeneration of places. Development proposals affecting the setting of a listed building should preserve its character, and its special architectural or historic interest. Where there is potential for non-designated buried archaeological remains to exist below a site, developers will provide an evaluation of the archaeological resource at an early stage so that planning authorities can assess impacts.
- 12.51 OHLDP Policy NBH4: Built Heritage supports all development which preserves or enhances the architectural, artistic, commemorative or historic significance of built heritage assets. Where there is clear evidence of historic significance, development which would have a substantial adverse impact on this significance will only be permitted where it can be demonstrated that all reasonable measures will be taken to mitigate any loss of this significance; and any lost significance which cannot be mitigated is outweighed by the social, economic, environmental or safety benefits of the development. In relation to listed buildings, it seeks to manage the special architectural and historical interest of listed buildings and their settings.
- 12.52 OHLDP Policy NBH5: Archaeology looks to support development proposals which preserve, protect, or enhance the archaeological significance of heritage assets. Development which would affect unscheduled sites of archaeological interest or potential will be permitted where the significance of the remains does not justify their physical preservation on site. Where archaeological features provide potential for amenity, cultural tourism, place-making, or as an in situ educational or research resource, the Comhairle will support proposals for long term management, access and interpretation of the historic environment assets on the site.

- 12.53 HES provide standing advice on the setting of heritage assets, to identify the main issues which can arise in different situations, to advise how best to deal with these, and to offer further sources of information. Setting can be important to the way in which historic structures or places are understood, appreciated and experienced. It can often be integral to a historic asset's cultural significance. Setting often extends beyond the property boundary or 'curtilage' of an individual asset into a broader landscape context. Both tangible and less tangible elements can be important in understanding setting.
- 12.54 The Comhairle Archaeology Service has confirmed that it is content with the conclusions of the Evaluation Report relating to the application site and further mitigation is not considered necessary in this respect.
- 12.55 No contributors made specific representations in relation to heritage assets, either designated or non-designated. However, concerns were expressed that the proposal would result in a desecration of cultural heritage.
- 12.56 Given the significant separation distances involved, the local topography, the scale and type of development proposed and the intervening existing development, it is considered that the proposal would not materially affect the setting of listed buildings within the wider area. Following the revisions to the proposal, it is also considered that the siting of the proposed additional parking area would not have a significant effect on the setting and cultural significance of the old cemetery, a non-designated historic asset.
- 12.57 Pre-determination evaluation of the site was undertaken, as requested by the Comhairle Archaeology Service, given the archaeological sensitivity of the site. However, despite a high likelihood for potential remains, the trial trenching undertaken noted no archaeological features or deposits. As a result, it is considered that no further archaeological monitoring or trial trenching is required, which reflects the comments of the Comhairle Archaeology Service.
- 12.58 Overall, therefore, it is considered that the proposal would adequately protect cultural and historic heritage assets, would not have an adverse impact on their setting or significance, and would be unlikely to materially affect unknown archaeological remains.

Coastal Erosion, Flood Risk

- 12.59 NPF4 Policy 10: Coastal development states that development proposals in developed coastal areas will only be supported where the proposal does not result in the need for further coastal protection measures or increase the risk to people of coastal flooding or coastal erosion, including through the loss of natural coastal defences including dune systems.
- 12.60 OHLDP Policy EI 6: Coastal Erosion states that development proposals on areas liable to coastal erosion will only be permitted when the applicant can demonstrate that the development will not exacerbate coastal erosion at the development site or elsewhere along the coast and when the applicant can demonstrate that the development meets one or more of the following: it will have exceeded its useful life expectancy before natural erosion is likely to occur; it is of a temporary nature; it will not give rise to, or require, defence measures.
- 12.61 Dynamic Coast's webpage reads: 'Scotland's Dynamic Coast website hosts modelled coastal change, including predictions of soft coast erosion, around Scotland under both a high and low (carbon) emissions scenario up to 2100. It advises that its findings are not suitable for assessments at a property level. However, the Coastal Change Assessment including web maps aims to create a shared evidence base to support more sustainable coastal and terrestrial planning decisions in the light of a changing climate.
- 12.62 Dynamic Coast Web maps are available which show the position of the soft shoreline in Scotland in the 1890s, 1970s and modern time period. Annual rates of landward erosion and seaward accretion are

also shown. Recent erosion has been projected landwards to suggest where the shoreline may be in 2050, if recent rates continue (i.e. no defences installed or erosion quickens). Using the erosion rates combined with a number of socioeconomic datasets, key assets at risk from future coastal erosion can be identified.

- 12.63 The National Coastal Change Assessment aims to inform existing strategic planning (Shoreline Management Plans, Flood Risk Management Planning, Strategic and Local Plans, National and Regional Marine Planning etc.) and to identify areas which may remain susceptible in future and require supplementary support. NatureScot is the advisory body for coastal erosion.
- 12.64 NPF4 Policy 22: Flood risk and water management seeks to strengthen resilience to flood risk by promoting avoidance as a first principle and reducing the vulnerability of existing and future development to flooding.
- 12.65 OHLDP Policy EI 1: Flooding indicates that development proposals should avoid areas susceptible to flooding and promote sustainable flood management. Development proposals should have regard to the probability of flooding from all sources.
- 12.66 NatureScot have noted that the decision to use ground reinforcing mesh, rather than aggregate, would enable the grassland to be easily restored in the event of, for example, the site being decommissioned or reconfigured in the event of coastal retreat.
- 12.67 Comhairle Engineering (Roads, Flood Risk and Coastal Erosion) note that the campsite is on a rocky peninsula with sandy beaches to either side. The access road is shown as being within an area of potential erosion in the next 30 years or so. In addition, SEPA's online coastal flood map indicates that the site should be clear of flooding in the short to longer term. It is recommended that signage or fencing should be installed, to indicate the appropriate point to access the beach, to discourage access via areas at risk of erosion. Information boards should advise visitors to use the appropriate access points and why it is important to do so (to minimise traffic on dunes which could exacerbate erosion).
- 12.68 Contributors have expressed concerns at the potential for the proposal to contribute to and exacerbate coastal erosion.
- 12.69 As indicated in the comments received from Comhairle Engineering (Roads, Flood Risk and Coastal Erosion), the area of the proposed campsite is situated on rock, with beaches to either side. Whilst these beaches may be subject to coastal change, the area of the proposed campsite is unlikely to be materially affected. The recommended use of signage to identify appropriate access points to the shore could reasonably be incorporated into the signage required by NatureScot and would further assist in reducing impacts on the natural environment.
- 12.70 In terms of flood risk, the SEPA Flood Maps indicate that, although the site itself is not identified as at risk of flooding, a section of the public road is at risk of surface water flooding. However, although this forms part of the access to the site, it is located some distance from the proposal and would also affect access to the cemetery. As such, if affected, it is reasonable to consider that provision would be made for access to be maintained.
- 12.71 Consequently, for these reasons, it is considered that the proposal would be unlikely to have a detrimental impact on, or be significantly adversely affected by, coastal erosion or flood risk.

Soils and Climate Change

- 12.72 NPF4 Policy 5: Soils states that development proposals will only be supported if they are designed and constructed in accordance with the mitigation hierarchy by first avoiding and then minimising the amount of disturbance to soils on undeveloped land and in a manner that protects soil from damage including from compaction and erosion, and that minimises soil sealing.

- 12.73 OHLDP Policy EI 5: Soils states that development should be designed to minimise adverse impacts on soils caused by ground disturbance, compaction or excavation. Developers should assess the likely effects associated with any development work on soils, particularly machair soil, peat, or other carbon-rich soils and associated vegetation, and aim to mitigate any adverse impacts arising.
- 12.74 NPF4 Policy 1 seeks to encourage, promote and facilitate development that addresses the global climate emergency and nature crises. It requires significant weight to be given to the global climate and nature crises when considering all development proposals. Policy 2 looks to encourage, promote and facilitate development that minimises emissions and adapts to the current and future impacts of climate change. Development proposals are required to be sited and designed to minimise lifecycle greenhouse gas emissions, as far as possible, and to adapt to current and future risks from climate change.
- 12.75 The climate crises, mitigation and adaptation policies apply to all development and need to be viewed not as a prohibitor to development but as an overarching policy, complementary to the other policy, regulatory and consenting regimes, which should work together to continuously address and reduce root causes of climate impacts.
- 12.76 OHLDP Policy PD4: Zero and Low Carbon Buildings requires all planning applications for new buildings to demonstrate that the carbon dioxide emissions reduction target, as required by Scottish Building Standards, has been met, including using low or zero carbon technology.
- 12.77 No consultation comments have been received that relate specifically to soils or climate change.
- 12.78 A number of contributors have raised concerns or objections relating to the potential impact on the machair and, more generally, in relation to climate change and sea level rise. The assessment of the potential effect on the machair environment has been undertaken in relation to natural heritage, and impacts from sea level rise are considered in relation to flood risk, both in separate sections of this Report, above.
- 12.79 Minimal excavation is proposed in relation to the development. With the exception of the facilities building and those pitches requiring re-grading, a no-dig construction method is proposed, with the use of reinforced mesh matting laid over the existing vegetation. As a result, the impact on the machair soils is considered to be very limited and would represent an improvement to the current informal use. A regulated development can ensure the manoeuvring and parking of vehicles is managed and restricted in number.
- 12.80 The proposed building would need to meet modern insulation and heat loss standards, which will largely be achieved through the requirements of the Building Warrant process. However given the modest scale of the new building, it is considered likely to result in a neutral impact on global climate change.
- 12.81 The scale of the campsite, whilst aimed at motorised vehicles, would not be a key contributor to additional emissions such that the development could be attributed to having a direct effect on the climate crises. Emissions from vehicles are managed through the Road Vehicle Emission Performance Standards regulations. The development is not of a significant scale such that there are additional, reasonable, material planning concerns regarding vehicle emissions.
- 12.82 As such, the impact of the proposed development on soils and climate change is considered to be acceptable and, in these respects, the proposal can be appropriately accommodated in this location.

Roads and Access

- 12.83 OHLDP Policy PD2: Car Parking and Roads Layout seeks road design and car parking suited to the type, location, scale and circumstances of the development. The SG sets out carparking requirements for caravan sites.
- 12.84 In this case, the proposed development is designed specifically for motorhomes, where each pitch would effectively provide a parking space for each motorhome. In addition, a further five car parking spaces (including three accessible spaces) and two larger parking spaces would be provided adjacent to the facilities block.
- 12.85 The Design Statement indicates the intention to provide accessible parking adjacent to the facilities block, to enable access to the beach to be retained for those with limited mobility, in addition to the additional parking provided for day visitors in the separate parking area.
- 12.86 Comhairle Engineering (Roads, Flood Risk and Coastal Erosion) have indicated that they are generally satisfied with the proposals and have no objections. Formalising the camp site area will help ensure that the site is managed in a responsible way. The provision of a passing place on the access track is welcomed and the provision of an additional parking area would be a valuable addition. Following the revisions to the proposal, no objections have been raised to the reduction in spaces proposed, or the removal of the separate footpath from the parking area to the campsite. The use of signage to identify parking areas and spaces is recommended.
- 12.87 Contributors have raised concerns and objected to the impact of the proposal on the local road network, including for cyclists and pedestrians, the lack of disabled access provision and the removal of public access to the beach.
- 12.88 Having regard to the nature and scale of the proposal, it is considered that the impact of the proposal on the local road network would be acceptable. The site is served by a single-track public road, which currently serves the informal use of the site, as well as the traffic generated by visitors to the two cemeteries. Whilst the proposal may result in an increase in the number of vehicles visiting the application site, the increase in traffic on the public road is unlikely to be materially significant, including in relation to pedestrians and cyclists, given the amount of traffic already using the local road network.
- 12.89 The main access track within the site would be surface dressed, improving the current access arrangements for vehicles and pedestrians. The development makes specific provision for public access to the beach to be retained as part of the overall management of the site, with the additional provision of a separate parking area for day visitors, plus accessible parking adjacent to the facilities building.
- 12.90 As a result, overall, the access and parking provision proposed are considered acceptable and appropriate to the type, location, scale and circumstances of the development proposed.

Water, Wastewater and Waste Management

- 12.91 OHLDP Policy EI 2: Water and Waste Water requires new developments to adopt the principles of Sustainable Drainage Systems (SuDS). Private waste water systems should discharge to land. New developments in areas with public water supplies will be required to connect to the public water supply. Policy EI 4: Waste Management requires developments to include space to accommodate the provision of recycling facilities and must be designed and built into all new industrial, commercial, retail and residential development.
- 12.92 Contributors raised concerns about the potential for pollution, including in relation to greywater and the drainage arrangements proposed.

- 12.93 It is proposed that the development would be connected to the public water supply. Scottish Water have not objected to the proposal. Details of the provision of drinking water within the site, in addition to the facilities building, would be controlled as part of the Site Licence process.
- 12.94 A foul water treatment plant would be installed, with the treated greywater discharge draining to a 30m long perforated soakaway pipe, at a minimum depth of 0.75cm, which would outfall to the foreshore. Sufficient space exists within the site for the provision of drainage and details of these arrangements would be subject to separate regulatory control under other mechanisms, such as the Building Warrant process.
- 12.95 Provision has been made for the storage of refuse and recycling bins on site and sufficient space exists for the number and type of provision to alter, should that be necessary as part of the Site Licence requirements.
- 12.96 Overall, it is considered that the development would not have an unacceptable impact on water, wastewater and waste management, provided it is operated in compliance with the relevant licencing requirements.

Other matters raised in representations

- 12.97 Comments were made that requested alternative sites to be considered in preference to the proposal. However, the planning authority is required to consider the merits of the application as submitted, subject to any revisions.
- 12.98 A number of procedural concerns were also raised. Given the scale and nature of the proposal, pre-submission public consultation by the applicant was not required by regulation.
- 12.99 The application was publicised in accordance with the relevant regulations and was made available to inspect in person and on-line throughout the application period, with two separate periods for public comment on the application (at submission and following revisions to the proposal). Given the number of representations and repeat representations received, there is nothing to indicate that these publicity arrangements were not effective.

CONCLUSION AND REASONS FOR RECOMMENDATION (REASONED CONCLUSION)

- 13.1 Planning authorities are required to determine planning applications in accordance with the Development Plan unless material planning considerations indicate otherwise. An assessment has been carried out against the provisions of the Development Plan, and consideration has been given to all material planning considerations.
- 13.2 Consultation responses and representation comments received from contributors have been reviewed and considered as part of the application assessment process. Some mitigation measures are considered necessary to enable the development to proceed satisfactorily and these mitigations can be secured and managed by planning conditions.
- 13.3 For the reasons set out above, it is concluded that the provision of a campsite as proposed in this location would be acceptable, subject to conditions. The siting and design of the development would respect the character and amenity of the surrounding area and would not have a detrimental effect on residential amenity. The development as proposed could be satisfactorily accommodated within the capacity of the local environment and its infrastructure, including in relation to water, drainage and waste disposal, and would make provision for safe and satisfactory access and parking.
- 13.4 The development site is not located within an area of identified flood risk and, due to the underlying ground conditions, would not be directly affected by coastal change. The development can take place without unacceptable damage to the foreshore or machair and, subject to identified mitigation

measures, it would be in accordance with the natural and built heritage policies of the Development Plan, including in relation to the landscape character and the special qualities, integrity, conservation objectives, qualifying and natural features of the South Lewis, Harris and North Uist National Scenic Area, the North Uist Machair and Islands Special Protection Area, the North Uist Machair Special Area of Conservation and the Machairs Robach and Newton Site of Special Scientific Interest.

- 13.5 Accordingly, the proposal is considered to accord with the policies of the Development Plan, taken as a whole, and in particular with National Planning Framework 4 and the Outer Hebrides Local Development Plan 2018 Policies 1, 2, 3, 4, 5, 7, 10, 14, 22, 29, 30, DS1, PD1, PD2, PD4, ED3, EI 1, EI 2, EI 4, EI 5, EI 6, NBH1, NBH2, NBH4, NBH5 and the Supplementary Guidance on Caravans, Huts and Temporary Building 2021. There are considered to be no material considerations to justify a decision not in accordance with the Development Plan.

PLANNING OBLIGATION

- 14.1 None.

DIRECTIONS

- 15.1 None.

RECOMMENDATION

- 16.1 It is recommended that the Planning Application be approved subject to the conditions set out in Appendix 1 to this Report.