Ross Priory

2020/0055

Update

From Gavin MacLellan

6 Nov 20

**Planning process – Application will go to Planning Committee**

An Environmental report from LLNP will be placed on the portal 10 days before the meeting. This may suggest a screening is needed for an EIA or not – as per the RSPB path.

**Comments made by KCC to LLNP in June objection**

KCC support the National Park Local Development Plan’s Protection Policies and consider the proximity to SSSI’s, the NNR and the Loch to be of high significance, so much that the same protection should apply.

We specifically reference:

Overarching Policy 1 Strategic Principles – Aim 1 is to conserve and enhance the natural and cultural heritage – the large modern angular buildings with extensive glazing, visible from the Loch and surrounds do not meet this. In other areas the Plan endorses the use of traditional architecture and natural materials,

Natural Environment Policy 3 Sites of Special Scientific Interest, The site sits between SSSIs and is close to National Nature Reserves and RAMSAR Sites, and is not “imperative for the public interest” and there are “alternative solutions”. The creation of a large light emitting structure between SSSI’s will be disruptive to animal movements.

Natural Environmental Policy 4 Legally Protected Species, “Development will not be permitted where it would have an adverse impact on any protected species…such as Ospreys”

Historic Environment Policy 3 & 4, the project does not enhance the historic Ross Priory buildings or landscape/gardens,

Natural Environmental Policy 6, Natural Environmental Policy 8 - The development destroys natural landscape and does not enhance biodiversity,

Natural Environmental Policy 11 there is no evidence to demonstrate that there would not be an impact on riparian habitats.

**Trees**

Rory Hobs, expert advises:

In the first instance, I would suggest contacting the consultant and asking if an AIA or AMS or tree protection plan has been instructed?

**Sewerage**

Scottish Water have not stated there is capacity – a capacity study to be done after detailed planning application. Letter on file 6 Nov20. Any capacity is available to the first comer so other village developments may be limited.

SEPA standards for “Nature of Volume of Discharge” do not specify Volume limit. Received end Oct20.

SEPA did not know the standards when they issued their non objection letter. Would appear that the non objection was not based on any science since no data is available – confirmed by Jaimie Burns.

SEPA accept concerns over Nutrients

Note the Gartocharn STP does not significantly reduce Phosphourous by treatment.

SEPA Advice to my enquiry:

Quote Jamie Burns, Senior Environmental Officer, SEPA

I’ve been looking at this in some more detail. Looking at the potential flows proposed the existing CAR licence would appear to cover this, therefore the additional flow from the development will probably not breach any licence conditions in terms of flows that the works can accept for treatment. I’ve looked over the performance of Gartocharn sewage treatment works and it has been performing well over the years and as long as Scottish Water can maintain the licenced discharge standards the existing licence should cover them with this respect too. Overall water quality in the Loch has been Good since 2017 and Total Phosphorous is also well within the classification limits for Good. However I do understand your concerns regarding Phosphorous, please let me assure you that we will be looking at any potential implications on Phosphorous as a result of any future development.

In terms of your concerns regarding an increased risk of eutrophication on the SE edges of Loch Lomond any proposals to significantly increase the population equivalent at Gartocharn will have to be discussed between Scottish Water and SEPA and this may require a variation of the existing CAR licence. Any increased risk to the water environment would be addressed at this stage, this could potentially require that the treatment standards in the licence would need to be tightened to allow for any increase to the population equivalent**. This would be looked at in detail at pre application/application stage.**

I will arrange for a formal response to the associated OME, it will be pretty much along these lines and you will have that in due course. In the meantime I hope this helps.

End quote

**Summary: the evidence for no negative impact is not available since the impact study has not been done and the basic facts are not known, the capacity of the STP is not known. There is no certainty and this is the reason why an EIA is required.**

Actions:

Prepare to review LLNP Environmental document

Prepare for Committee meeting.