

Comments for Planning Application 22/00287/FULL

Application Summary

Application Number: 22/00287/FULL

Address: Land 376M East Of Nether Craig Caravan Park Alyth

Proposal: Extension to Nether Craig Holiday Park for an additional 79 caravan pitches and other ancillary works

Case Officer: Ruari Kelly

Customer Details

Name: Kirriemuir Landward West Community Council

Address: c/o Easter Derry Kilry Kilry

Comment Details

Commenter Type: Community Council

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The increase in the number of units on the site from 110 to 189 is likely to result in a significant increase in traffic to and from the site along a single track road with a limited number of passing places, some poor sight lines and some deep ditches. This road is the only access for farm traffic and local residents as well as visitors to the Holiday Park.

Safety for all road users, be they pedestrians, cyclists, visitors or tractors must be of paramount importance when considering this application. Angus LDP Policy TC 16 states that for new or improved tourism related facilities, there should be 'no unacceptable impact on the built and natural environment, surrounding amenity, traffic levels, access or infrastructure'. If councillors and officials think that such a big expansion of this site meets this policy statement and is desirable in an otherwise quiet rural corner of Angus, the Community Council hopes that some effective form of traffic calming will be a condition of consent.

There are no speed restrictions on this road but speed restrictions would only be effective if accompanied by rigorous enforcement which is unlikely given the other pressures on Police Scotland.

In its current form Kirriemuir Landward West Community Council objects to this proposal.

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Address: Land 376M East Of Nether Craig Caravan Park Alyth

Proposal: Extension to Nether Craig Holiday Park for an additional 79 caravan pitches and other ancillary works

Case Officer: Ruari Kelly

Customer Details

Name: Mr Michael Clarke

Address: Easter Craig Farm Alyth Blairgowrie

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I would like to object to the extension of Nether Craig Caravan Park.

The reason being that the unclassified road is not fit for purpose.

There are not enough passing places and they aren't intervisable. Private field entrances and driveways are used instead.

The increased park capacity would increase road useage by at least 100%. At present the road is congested and makes it difficult for my farm traffic and moving livestock.

The increase in traffic would make it even more dangerous for pedestrians, cyclists, pets and red listed wildlife.

The local area is not suitable for a development of the equivalent of 150 houses at the end of an unclassified road with inadequate passing places.

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Address: Land 376M East Of Nether Craig Caravan Park Alyth

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Case Officer: Ruari Kelly

Customer Details

Name: Mrs Susan Garrett

Address: Gowanie, Nether Craig, Nether Craig, By Alyth Blairgowrie

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Our major concern is with the state and increasing use of the road by approximately further 120%. This is a single track lane already in a poor state of repair, which includes obvious subsidence, pot holes etc.

The intention to potentially increase traffic with no restrictions is hazardous to walkers, cyclists and drivers. Adjacent Councils have introduced speed restrictions of 20 miles per hour, to alleviate the potential harm. It also raises a wider issue that the roads around this area are equally in a poor state of repair; many little more than single track and yet used by a range of heavy goods, farm machinery too large for the roads let alone an increase in 'ordinary' traffic.

Those residents although few in number, which may be the reason you think there are few objections, have direct access onto the lane where already pets have been hurt and small children with little road sense can be harmed. Equally many of the drivers are unable to negotiate the single track lane safely and the intervisible passing places are now completely inadequate. A number of incidents including a call to the police have occurred since the increase to traffic on the lane and since the previous extension took place. What was a relatively quiet safe lane is now consistently busy even in the winter months.

Hence some form of restriction or calming of traffic seems necessary if further traffic is to be expected.

Further extension to the park itself in the current economic climate seems unnecessary and inappropriate, particularly as the topography of the new section will carry further issues in terms of infra structure and therefore construction will take an even greater toll on the road than in the previous extension to include statics.

We also notice that none of the neighbours living down this lane have been notified apart from the manager of the Caravan Park who has initiated the application. Complete response to be emailed

Our major concern is with the state and increasing use of the road by approximately further 120%. This is a single track lane already in a poor state of repair, which includes obvious subsidence, pot holes etc.

The intention to potentially increase traffic with no restrictions is hazardous to walkers, cyclists and drivers. Adjacent Councils have introduced speed restrictions of 20 miles per hour, to alleviate the potential harm. It also raises a wider issue that the roads around this area are equally in a poor state of repair; many little more than single track and yet used by a range of heavy goods, farm machinery too large for the roads let alone an increase in 'ordinary' traffic.

Those residents although few in number, which may be the reason you think there are few objections, have direct access onto the lane where already pets have been hurt and small children with little road sense can be harmed. Equally many of the drivers are unable to negotiate the single track lane safely and the intervisible passing places are now completely inadequate. A number of incidents including a call to the police have occurred since the increase to traffic on the lane and since the previous extension took place. What was a relatively quiet safe lane is now consistently busy even in the winter months.

Hence some form of restriction or calming of traffic seems necessary if further traffic is to be expected.

Further extension to the park itself in the current economic climate seems unnecessary and inappropriate, particularly as the topography of the new section will carry further issues in terms of infra structure and therefore construction will take an even greater toll on the road than in the previous extension to include statics.

We also notice that none of the neighbours living down this lane have been notified apart from the manager of the Caravan Park who has initiated the application. Also that reports that drainage, sewerage and access to water from the local reservoir are still outstanding: we would also request that the roads department further investigate our concerns not only on this lane but the issue of the poor state of the roads in the surrounding areas.

Sue and John Garrett

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Address: Land 376M East Of Nether Craig Caravan Park Alyth

Proposal: Extension to Nether Craig Holiday Park for an additional 79 caravan pitches and other ancillary works

Case Officer: Ruari Kelly

Customer Details

Name: Mr Mark Hilton

Address: Auchrannie farm house Alyth

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object to the proposal of the extra 79 caravans on the grounds that the road is subsidising the road is unsuitable for extra traffic you are endangering my sons life you're enjoying enjoying wild life.

There is already too much traffic going up and down the road with the loads of caravans that will have to be transported up the road. Is the road up to a standard to allow this traffic to go up and down house there will have to be concrete mixers going in and out heavy machinery to dig the site and put the road sign on the site.

The infrastructure that we have with the roads at the moment is not up to a standard to allow all this heavy machinery and caravans to motor along it people have to live here my son has to walk up the road to get the school bus is it going to get hurt I need to get her who is going to responsible for it.

Also is there going to be extra Emergency services has an extra 79 caravans that means at least another 140 odd people in the area which may require emergency treatment so is the doctors going to be extended and the shops in the village.

Hasin the passed cars have to go into the verge and got stuck and blocked the road what plans are there so that people can go out and in to their homes

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Address: Land 376M East Of Nether Craig Caravan Park Alyth

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Case Officer: Ruari Kelly

Customer Details

Name: Mr Bruce Langlands

Address: Dalbhraddan Farm Kilry Blairgowrie

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object on the grounds of road safety, there are a lot of people walk on the road at the moment because they prefer that to the woodland walk, as the football pitch, golf practice area and open park area will go in the new plans this will only get worse. Also on the road are young children on bicycles that they have just learnt to go them and some times a long way from the watching adult and panic when they see on coming traffic, with the road being single track and becoming badly overgrown and no pavement this is a bad accident waiting to happen. I also object to five of the pitches being hard up to the match fence with us, cattle in that field could almost reach over the fence and touch them. So if this goes ahead can I request that a hedge be put in at this part of the site, one that is at least six feet high so cattle can not see over it and be attracted to something on the site.

Bruce Langlands for Matthew Langlands & Co

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Address: Land 376M East Of Nether Craig Caravan Park Alyth

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Case Officer: Ruari Kelly

Customer Details

Name: Mr Robert Martin

Address: The Craigs Kilry Alyth

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I wish to submit my objection to this proposal. I feel strongly that it would have a negative impact to have increased traffic on a road system that is not designed to handle said traffic. This is a single lane national speed limit rural and residential road, it already struggle with the volume of traffic and the surface of the road is already in a poor state of repair. I have seen examples of speeding down this road along with dangerous driving and I do not want to see more traffic causing increased risk of this.

We have young grandchildren and I don't want them exposed to further traffic and potential speeding. We have direct access to this lane from our property and the other side of the road belongs to us too. We have grass and plants on that side and face the risk of injury from increased traffic and speeding down a road that is simply not designed to handle this level of traffic. There is no way it would be acceptable or safe to allow increased traffic down this lane in the way it is currently set out. The road is already in a poor state of repair and further increased traffic is likely to cause more damage. It is also likely that due to the lack of adequate passing places that the sides of the roads will suffer further subsidence. This should be a quiet rural residential area and it is being increasingly busy with traffic. Simply put this road is in no way designed or maintained to a level to sustain increased traffic without a real and immediate risk of incident or injury.

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Address: Land 376M East Of Nether Craig Caravan Park Alyth

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Case Officer: Ruari Kelly

Customer Details

Name: Mr Graham McLaren

Address: The Birches Dalbhraddan Farm Alyth

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: My main area of concern is, along with other residents, that of road safety. The only exit/entry to the site is by way of the present 1 mile unclassified single track road from the B954. This road is narrow and measures only 2.5m with deep ditches on both sides and is often slippery due to mud from agricultural vehicles. It is used not only by vehicles, cyclists but also by pedestrians, dog walkers and the possibility of children going to and from school. Although there are passing places there is just nowhere for pedestrians to take refuge. The road is just not designed for such a large volume of traffic which is likely to emanate from this proposal. I see it as foolish to wait until someone is struck by a car before safety improvements are carried out.

The present site has a capacity of approximately 50 tourers and 60 statics. Therefore to increase this capacity will also increase the amount of traffic on the access road.

Using the above figures the number of units will increase to 189.

If the present site and the proposed extension ran at full capacity, the volume of traffic could increase by almost 100%.

The operators of the site are selling it on "an away from it all basis with peace and tranquillity" which incidentally is why most of the residents chose to live here too; but I fail to see how this can be the case when the applicant wants to establish what amounts to a village of 189 homes, leading to an increase of litter and dog fouling along the access road and the surrounding area. In conclusion should this application be approved I believe it would not only seriously affect the tranquillity and quality of life of permanent residents in the area, but most importantly the single track access road was not and is not designed for the high volume of traffic which undoubtedly will result in safety issues for permanent residents. Therefore I believe that the permanent residents are being placed second to the desire to increase the capacity of the site.

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Address: Land 376M East Of Nether Craig Caravan Park Alyth

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Case Officer: Ruari Kelly

Customer Details

Name: Mr Nicholas Morrocco

Address: Hafflins, Nether Craig, Alyth Alyth BLAIRGOWRIE

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: We wish to register our objection to the Planning Application 22/00287 (change of use for extension of Nether Craig Holiday Park).

The issue of the access road from the B954 towards the Holiday Park has been brought to the attention of Angus Council by the majority of objectors to previous planning applications dating back to 2005 but will continue to remain a valid concern with the subsequent increase in vehicle journeys to and from this extension.

Angus Council must take seriously the safety of all users of this single-track road with its limited number of passing places, ditches either side, slight verges and no pedestrian walkway. There have also been changes to the Highway Code in relation to the 2-metre space between pedestrians and passing vehicles; this is difficult to achieve on a single-track road measuring approximately 3 metres wide. Public awareness of the changes is very low.

We will also submit a further email in which we will more fully explain our objection to this application with reference to the spacing between passing places and vehicle speed control.

We feel like we have been here before and that our comments may be similar to those we wrote in 2012.

An application for planning permission to change the use of land for an extension to the static caravan park at Nether Craig Holiday Park would suggest that there is a demand for this type of holiday accommodation. However, since the original application in 2005, only now might the existing static park be nearing its capacity of 60 units; only a single new static caravan was delivered and sited earlier this season, 2022. 60 units sited over the last, let's say, 15 years does not display an overwhelming demand for a further 79 units on this proposed site.

Access road from B954

If this application was to be successful it would mean a 70% increase in traffic movements related to Nether Craig Holiday Park. This will highlight the unsuitability of the one mile of single-track access road from the B954.

Inter-visibility of passing places on single-track roads seems to have been the only criteria employed for the siting of the passing places, but there are sections of this road where inter-visibility between passing places is not achievable. There is, however, a web site which offered quite clear specification. Appendix A – HS2 Rural Road Design Criteria:

A.6.8. Inter-visible passing places must be provided on single-track roads at a **maximum spacing of 200 metres**.

A.6.7. The normal width of single-track roads as being 3.5 metres.

Neither of these criteria are currently met on this section of road.

Road Safety

Along with the permanent residents of the Nether Craig area, many of the caravan site customers walk and cycle along this access road for both recreation (often with young family) and for necessary dog walking. As local residents, when driving on this road we are aware of the likelihood of meeting pedestrians or vehicles and adjust our speed accordingly when approaching corners and when passing pedestrians. Unfortunately, the same cannot be said for a minority of visitors to the holiday park. Their excessive speed and poor road sense has caused many near misses around corners and frustration between passing places. When pedestrians have to react quickly to a potentially dangerous situation, they naturally want to take to the verges but other issues come into play – slight or inadequate verges, steep drainage ditches, no walkway/pavement and dog fouling. Many pedestrians are now reluctant to move off the road which also creates tension and frustration among the various users of this road.

Some of the rules of the Highway Code have been written to favour the safety of the pedestrian. Two relevant examples in Rule 163 are –

- allow at least 2 metres space and keep to a low speed when passing a pedestrian who is walking in the road (e.g., where there is no pavement)
- you should wait behind the motorcyclist, cyclist, horse rider, horse drawn vehicle or pedestrian and not overtake if it is unsafe or not possible to meet these clearances.

Unfortunately, a high percentage of drivers are unaware of these changes.

Specific examples of dangerous driving were the killing of a red squirrel and a pet cat, and the near miss of a collision by an impatient driver with my wife, on his way to the Holiday Park, squeezing (at pace) between a hedge and a parked retail van.

These are the conditions/problems that exist currently so adding a further 70% of Holiday Park traffic would only exacerbate the problems. Creating an absolutely new two carriage way road or many more sign-posted passing places, introducing speed restrictions of 40mph along the majority of the road and 20mph through the built-up area, may improve road safety. Actions of this kind may also satisfy the concerns of the local residents while at the same time curbing the reckless driving of holiday visitors and others.

A further 79 holiday park units on top of the 110 that already exist, to create what in effect makes this a village, will be seen as ‘creeping suburbanisation’ which would not fit with this rural landscape.

With these issues in mind, **we strongly recommend that this application be rejected.**

Should this application be approved, it must include the condition that the developer funds and creates the improvements to the road, and that this is done prior to any of the disruptive ground works commencing.

Mr. N & Mrs. E Morrocco

Hafflins,

Nether Craig.

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Address: Land 376M East Of Nether Craig Caravan Park Alyth

Proposal: Extension to Nether Craig Holiday Park for an additional 79 caravan pitches and other ancillary works

Case Officer: Ruari Kelly

Customer Details

Name: Mr Eric Young

Address: Nether Craig House, Alyth, Blairgowrie PH11 8HN

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: A proposal for 79 caravan bases and build-out "determined by market demand" undermines national, regional & local plans & damages local amenity: disruption (groundworks) initially intense, then occasional (siting 79 statics), & permanent non-resident traffic build-up post occupation.

SPP accepts developments to protect & enhance environmental quality, but "it is important to protect against an unsustainable growth in car-based commuting and the suburbanisation of the countryside" (p21)

TAYplan policy 2 sets a "place led" approach with proposals in harmony with "existing features, networks and infrastructure".

Angus LDP Policy TC16 supports proposals outwith development boundaries where "the scale and nature of the development is in keeping with the character of the local landscape and pattern of development" & "there is no unacceptable impact on the built and natural environment, surrounding amenity, traffic levels, access or infrastructure".

Proposal only considers park precincts, & ignores impact on wider amenity & welfare. Limiting neighbour notification to the manager is significant.

Sole access from B954 is a 60 mph(!) narrow mile long single track road, marginally improved before 2009 expansion. It has ditches each side, occasional passing places, some inter-visible, some not, some signed, some not, some planned, some incidental (field or house entrances).

Road use can be ill judged: a cat & red squirrel were recent victims and vehicle manoeuvres are common.

Perhaps 18 local vehicles use it regularly. An eventual 189 touring & static caravans threaten a tenfold increase. Their shopping trips will dwarf local use. 5 houses lie on the road before the park, some with poor sight lines.

TRICs rush hour data is spurious. Amenity at Nether Craig concerns daily traffic volume. The

proposal envisages/advocates steady & significant growth for every month in the year but one!
Will Condition 10 of Council Report 922/08 still apply? If so, economic benefit is arguable.

A proposal for 79 caravan bases and build-out “determined by market demand” undermines national, regional and local plans, damaging local amenity: disruption (groundworks) initially intense, then occasional (siting 79 statics), and finally permanent non-resident traffic build-up post occupation.

Scottish Planning Policy (2014) accepts developments to protect and enhance environmental quality, but “it is important to protect against an unsustainable growth in car-based commuting and the suburbanisation of the countryside” (p21)

TAYplan (2017) policy 2 sets a “place led” approach with proposals in harmony with “existing features, networks and infrastructure”.

Angus Local Development Plan (2016) Policy TC16 supports proposals outwith development boundaries where “the scale and nature of the development is in keeping with the character of the local landscape and pattern of development” and “there is no unacceptable impact on the built and natural environment, surrounding amenity, traffic levels, access or infrastructure”.

The proposal only considers park precincts, and ignores impact on wider amenity and welfare. Limiting neighbour notification to the manager is significant.

Sole access from B954 is a 60 mph(!) narrow mile long single track road, marginally improved before 2009 expansion. It has ditches each side, occasional passing places, some inter-visible, some not, some signed, some not, some planned, some incidental (field or house entrances). Road use can be ill judged: a cat and red squirrel were recent victims and vehicle manoeuvres are common.

Perhaps 18 local vehicles use it regularly. An eventual 189 touring and static caravans threaten a tenfold increase. Their shopping trips will dwarf local use. Five houses lie on the road before the park, some with poor sight lines.

TRICs rush hour data is spurious. Amenity at Nether Craig concerns daily traffic volume. The proposal envisages/advocates steady and significant growth for every month in the year but one!

Will Condition 10 of Council Report 922/08* still apply? If so, economic benefit is arguable.

*10 That the site hereby approved be used for holiday accommodation only and no person shall occupy any part of the site on a permanent residential basis. No caravans shall be occupied between the period of 15 January to 14 February and the maximum stay by any individual, family or group be restricted to 8 weeks continuous stay on the site unless otherwise approved in writing by the Planning Authority.

From M & E Young
Nether Craig House
Alyth
PH11 8HN

From: Myra and Eric Young, Nether Craig House, Alyth, PH11 8HN

Expanded comments in objection to Application 22/00287/FULL: Extension to Nether Craig Holiday Park for an additional 79 caravan pitches and other ancillary works at land 376M East of Nether Craig Caravan Park, Alyth.

This application proposes 79 caravan bases and build-out “determined by market demand”. The scale of the expansion planned threatens to damage local amenity for permanent residents and existing holiday makers: initial disruption from groundworks will be intense, then occasional as 79 static caravans are delivered, and finally non-resident traffic will build-up after their occupation as a permanent feature of life for all.

Around 18 local vehicles use the access road to the B594 regularly. An eventual 189 touring and static caravans threaten a tenfold increase. Indeed, the proposed extension removes existing space for recreational activities on the site. The number of static caravans will more than double and the loss of amenity on-site will increase the likelihood of holiday-makers regularly leaving their caravans for excursions and shopping. These trips will dwarf local use and risk safety around the five houses, some with restricted sight lines, situated close to the road before the park.

In objecting, we note that the supporting statement prepared by Bermar Properties (Scotland) Limited makes very selective reference to national, regional and local planning principles. The result is a partial presentation of benefits, mainly economic, with no regard for any disadvantage for the homes and farms that have to share the amenity of the environment around Nether Craig with the caravan park.

Arguably, the approach engages in dishonesty by using deception to persuade. This is exposed by limiting neighbour notification to the park manager’s house in the application process. That house, being more than 20 metres from the tightly-drawn boundaries of the site in question, is not a required inclusion. However, the chance of it being a source of opposition is small, unlike that of other homes in the area which were excluded, despite having a very real interest in the process.

In relation to national policy, the supporting statement for this application cites The Scottish Planning Policy 2014 (SPP) as encouraging planning authorities “to take a positive approach to new development in rural areas which will allow rural businesses to flourish ... the planning system should promote business development that increases economic activity while safeguarding and enhancing the natural and built environments as well as giving due weight to the net economic benefit of proposed development.” (pp 6-7) While acknowledging the need for planning proposals to safeguard and enhance the natural and built environments, the proposal limits comments to life within the park itself; neither the proposals presented nor the supporting statement concede that there might be issues for those who share the road.

For example, a necessary balance between economic and environmental priorities in the SPP is addressed in paragraph 76, delivering rural development: “it is important to protect against an unsustainable growth in car-based commuting and the suburbanisation of the countryside” (p21) This points to the danger that, when non-residential facilities such as holiday parks expand to dominate the environment they share with smaller local communities, no one thrives.

Regional policy is guided by TAYplan (2017). Policy 2 “Shaping Better Quality Places” adopts a place-led approach with four guiding principles none of which are explicitly acknowledged in this supporting statement:

- a) Outside-In; Understanding the environmental context of a site, how a site works in its wider setting;
- b) Inside-Out: how the site builds on existing features, networks and infrastructure, enhancing these through new development;
- c) Integrate Networks: Making it easy, safe and desirable to walk and cycle ... and enhance these areas to deliver a better quality of place and life;
- d) Work with the grain of the place Respecting and working with the grain of a place. This approach will help determine the size, shape and form of development and how it can respond to adaptation to help achieve future-proofing our new communities and facilities.

As a broad comment, the proposal under consideration and its supporting statement are at pains to reassure there will be negligible impact on with the holiday park itself and completely ignore the wider environmental context of the holiday park, its existing features, networks and infrastructure and runs the risk of diminishing the quality of place and life for both residents and holiday makers: e.g.

“The proposed extension does not interfere with the amenity of any surrounding property or buildings, such as sunlight, daylight or privacy.” p14

“Any existing off-site residential properties are located on the approach to the park from the west and further to the south. The extension will have no impact on these properties due to their relative distance/remoteness from the site.” p15

and, of development traffic,

“Due to the nature of the proposed development the traffic generation will be extremely low and will have no impact upon the safe operation of the main access route or junction with the B594.” p25

Apparently, the earlier development phase consisted of seven weeks of daily deliveries by heavy lorries of hard-core, etc.

In relation to local planning arrangements, Policy TC16 (Tourism Development) of Angus Local Development Plan (ADLP) Policy is quite specific. Notably, this did not apply when the earlier application (08-01004-FUL) was approved.

“Proposals for new or improved tourism related facilities and tourist accommodation will be directed to sites within development boundaries.”

Clearly, an extension to the existing park cannot be located somewhere other than the current site. However, it does not follow that any extension should be considered simply because space is available on site. The area identified for development is currently used for supporting mainly sporting, leisure facilities, e.g. football, golf practice. Their loss will only encourage more car journeys along a mile-long single track road ill-equipped for frequent journeys out and back.

ADLP also states that:

“Outwith development boundaries, proposals for new or improved tourism related facilities and accommodation will be supported where:

...

- the scale and nature of the development is in keeping with the character of the local landscape and pattern of development; and
- there is no unacceptable impact on the built and natural environment, surrounding amenity, traffic levels, access or infrastructure.”

Each of these conditions presents a direct challenge to the claims and aspirations of the current planning proposals:

- a) The scale and nature of the park has already disturbed the character of the local landscape and pattern of development by introducing a volume of traffic that has already put additional day-long pressure on the sole mile-long access road to and from the caravan park. This road is still designated 60 mph. It is unusually narrow and was only marginally improved before the first expansion of the park in 2009. It has ditches on each side, occasional passing places at irregular intervals, some inter-visible, some not, some signed, some not, some planned, some occurring incidentally at field and house entrances. Vehicle manoeuvres are frequent and sometimes contended. Excessive speed can be involved and the Highway Code is not always observed. Road use can be ill-judged: a cat & red squirrel were recent victims and there have been near misses. Walkers and cyclists can be put in danger by careless motorists.
- b) Without further road improvements, the increased volume of traffic generated by vehicles from 79 static caravans can only have further adverse “impact on the built and natural environment, surrounding amenity, traffic levels, access and infrastructure” in and around Nether Craig.

Local policy also indicates that:

“Angus Council will attach occupancy conditions to prevent tourist accommodation being occupied as permanent residential accommodation. Applications to remove such occupancy conditions will not be supported.”

Given the additional pressures on the local infrastructure at Nether Craig, this determination to ensure tourist occupation does not become permanent is welcome. However, such an occupancy condition, while desirable, limits the extent to which the economic claims made in the supporting statement can be substantiated. These claims of £1.3m and 26 full-time equivalent local jobs a year for the extension, and £3m and over 50 local jobs for the whole park are based on an average occupancy of 213 days each year.

In 2008, specific planning conditions were set for the approval of application 08-01004-FUL. Condition 10 is designed “to ensure that no permanent residence is formed at the site”: the park is closed from 15 January to 14 February each year and no individual, family or group can be resident for more than eight weeks without written permission from the planning authority. If this condition - a precursor to the current ADLP position - is still in place, it’s difficult to see how a claimed average occupancy of 213 days for 79 static caravans can provide a local economic benefit of £1.3m and over 26 full time jobs not to mention the overall figures of £3m and over 50 jobs.

In conclusion, we would oppose this application for both principled and practical reasons. First it offers a poor fit with the aspirations enshrined in existing national, regional and local

planning priorities and, in practice, it is likely to have a detrimental impact on the environment and amenity that the area around Nether Craig offers both permanent residents and visitors.