

**THE TOWN AND COUNTRY PLANNING ENVIRONMENTAL IMPACT ASSESSMENT (SCOTLAND) REGULATIONS 2017  
SCOTTISH GOVERNMENT CIRCULAR 01/2017**

**RESPONSE OF SOUTH AYRSHIRE COUNCIL TO A PLANNING APPLICATION (22/00483/APPM) SUBMITTED WITHOUT AN EIA REPORT. THE PROPOSED DEVELOPMENT FALLS WITHIN THE SCOPE OF THE TOWN AND COUNTRY PLANNING ENVIRONMENTAL IMPACT ASSESSMENT (SCOTLAND) REGULATIONS 2017 AND THEREFORE MUST BE CONSIDERED IN TERMS OF THE NEED TO BE ACCOMPANIED BY AN EIA REPORT.**

**THE PROPOSED DEVELOPMENT SITE IS LOCATED AT LAND AT CROFTHED CARAVAN PARK, AYR, SOUTH AYRSHIRE, KA6 6EN.**

The development relates to a proposal for change in use of field to form extension to an existing holiday park to site an additional 150 holiday lodges. The development will also include the installation and extension of internal road networks and the provision of landscaping. The application site extends to 8.4 hectares approximately.

The proposal is Schedule 2 development under the terms of the above Regulations as it falls within the auspices of 'holiday village/hotel complexes outside urban areas and associated development project' which exceeds 0.5 hectares. It therefore requires to be screened in order to determine whether the proposal constitutes 'EIA development'.

This determination is referred to as a '**screening opinion**'. In each case, the basic question to be asked is: 'would this particular development be likely to have significant effects on the environment?'

For many types of development, perhaps the majority, it will be necessary to consider the characteristics of the development in combination with its proposed location in order to identify the potential for interactions between a development and its environment and therefore determine whether there are likely to be significant environmental effects. In determining whether a particular development is likely to have such effects, the Council has taken account of the selection criteria in Schedule 3 to the Regulations (reproduced at Annex A to Circular 01/2017). Three categories of criteria are listed:-

- Characteristics of the development
- Location of the development
- Characteristics of the potential impact

Consideration of the third of these categories is designed to help in determining whether any interactions between the first two categories (i.e. between a development and its environment) are likely to be significant.

The content of this checklist meets the requirements of the Town and Country Planning (Environment Impact Assessment) (Scotland) Regulations 2017 – Schedule 3 selection criteria for screening Schedule 2 development.

	Yes/No	Briefly describe	Is effect likely to be significant? Significance should be considered in terms of the extent, transboundary nature, magnitude and complexity, probability, duration, frequency and reversibility of any impact(s).
<b>1. Characteristics of the Development</b>			
<b>(a) Scale of the development</b>			
Will the development be out of scale with the existing environment?	No.	<p>Crofthead Caravan Park has been subject to a series of extensions over the years with the most notable development being a masterplan extension granted in 2016. This is currently being implemented on site.</p> <p>The development proposal subject to this screening opinion will seek to further expand the caravan park and will be built out from part of the south and the southwest corner of the most recent extension granted.</p>	<p>No.</p> <p>In this instance, it is relevant to note that this proposal is for a further extension to a sizeable and long-established caravan park. The original caravan park has been extended at least 8 times previously via earlier applications granted.</p> <p>Holiday accommodation/caravan parks are not alien features in the surrounding environment, and it is considered that this particular form of development at this location would constitute an identifiable and relatable use given the site to which it relates. The scale and nature of the development is relatively low density and is generally consistent with earlier extensions with regards to overall design and approach.</p> <p>In summary, it is considered unlikely that this proposal would be significantly out of scale with the existing environment or surrounding locality in this context. Any impact of the layout, density and visual impact of the development can be appropriately assessed through the planning application.</p>
Will it lead to further consequential development or works (e.g. new roads, extraction of aggregate, generation or transmission of power)?	Yes.	There will be consequent requirements for the provision of a comprehensive suite of utilities and services to the caravans/holiday lodges on site and means of internal access to be introduced to/from the site to the existing public road network.	<p>No.</p> <p>The size of the site and scale of proposed works indicate significant effects are unlikely. It is also not considered likely that the developments, applications and proposals</p>

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		It is also common for caravan parks developments to be subject to subsequent applications and this includes proposals for other applications for ancillary/supporting developments for existing caravan parks (offices/play parks etc).	that could reasonably follow on from this proposal would constitute anything of environmental significance.
<b>(b) Cumulation with other development</b>			
Are there potential cumulative impacts with other existing development or for proposed development in the planning system?	Yes.	As set out above, this development proposal is for an extension to the current caravan park with the intention being to add a further 150 caravan bays to the caravan park.	No.  Given the nature/scope of the proposals, it is not considered that there will be potential cumulative impacts of significance in EIA terms.  Any cumulative impacts which may occur; including visual and landscape affects and further implications for traffic on surrounding road networks can be appropriately assessed through the planning application. In this regard, both a supporting statement (considering visual and landscape impacts) and a transport assessment have been supplied in support of the application.
Should the application for this development be regarded as an integral part of a more substantial project? If so, can related developments which are subject to separate applications proceed independently?	Yes.	As set out above, this development proposal is for an extension to the current caravan park with the intention being to add a further 150 caravan bays to the caravan park.	No.  Whilst this extension can be considered as part of a wider project to develop out and expand the caravan park, it is not considered that it would impede the delivery and implementation of earlier extension applications granted noting that it is on land at the periphery of the caravan park holdings.
<b>(c) Use of natural resources</b>			

	Yes/No	Briefly describe	Is effect likely to be significant? Significance should be considered in terms of the extent, transboundary nature, magnitude and complexity, probability, duration, frequency and reversibility of any impact(s).
<p>Will construction or operation of the development use natural resources i.e. land (especially undeveloped or agricultural land)?</p> <ul style="list-style-type: none"> <li>• water or fisheries?</li> <li>• minerals or aggregates?</li> <li>• agriculture, forests and timber?</li> <li>• energy including electricity and fuels?</li> <li>• any other resources?</li> </ul>	Yes.	The caravan park itself would be situated on previously undeveloped agricultural land and as such it is noted that this would be partly compromised as agricultural land should the development progress. It is also anticipated that aggregates will be used to assist the construction/delivery of the development.	<p>No.</p> <p>The land is not identified as prime quality agricultural land and any effects of the loss of agricultural land to accommodate the development are unlikely to be significant in EIA terms. The loss of agricultural land and any effects and impacts identified can be appropriately assessed through the planning application process and without the need for a specific environmental assessment in this respect.</p>
<b>(d) Production of waste</b>			
<p>Will the development produce wastes during construction or operation or decommissioning?</p>	Yes.	<p>It is anticipated that some waste may well be generated from the construction phase of the development, including for groundworks or civil engineering to deliver the development platform.</p> <p>In terms of the operational phase, given the nature of the development itself (e.g. caravans which will be used and occupied by people for holiday purposes), some degree of waste would be generated.</p>	<p>No.</p> <p>As set out, waste is a predicted and anticipated consequence of a development of this type, but the level of waste generated would not in itself be considered to be significant in EIA.</p>
<b>(e) Pollution and nuisances</b>			
<p>Will the development cause noise and vibration or release of leachates, light, heat energy or electromagnetic radiation during construction, operation or decommissioning?</p>	Yes.	<p>There will be noise during the construction of the development however these works will be temporary.</p> <p>It is also anticipated that there will be residential-scale noise, light and heat energy emitted consequent to site occupation and this will likely be at its height during residency seasons.</p>	<p>No.</p> <p>The application site and in particular the proposed site for the caravan park within it benefits from a sizeable curtilage and substantial screening (in the form of trees/woodland) which would assist to mitigate and buffer potential affects.</p>

	Yes/No	Briefly describe	Is effect likely to be significant? Significance should be considered in terms of the extent, transboundary nature, magnitude and complexity, probability, duration, frequency and reversibility of any impact(s).
			The use of holiday caravans is not typically regarded as a noise generating use in itself. Any potential impacts as a result of noise could be appropriately assessed through the planning application in collaboration with the Council's Environmental Health Service as a consultee.
<b>(f) Risk of accidents, having regard in particular to substances technologies used</b>			
Will there be a risk of accidents during construction or operation of the development which could have effects on people or the environment?	No.	During construction there will be heavy machinery, transport and construction equipment/materials on site which all present danger and accident hazard. There will always be risks associated with the construction phase of this type of proposal although no risks are anticipated that could have wider effects on people or the environment outwith the site itself.	No.  These risks will stand to be managed in accordance with industry standards and due protocol in safe working practice.
<b>(g) Other characteristics: potential physical changes (topography, land use, changes in waterbodies etc) from construction, operation or decommissioning of the development</b>			
<ul style="list-style-type: none"> <li>permanent or temporary change in land use, landcover or topography including increases in intensity of land use?</li> </ul>	Yes.	The land is currently agricultural land and therefore if consented, the use of the land would change.	No.  Whilst this would essentially be a permanent change in land use, the land is not identified as prime quality agricultural land. It is therefore not considered that this change would be significant in EIA terms noting the location of the application site and the nature and type of development.

	Yes/No	Briefly describe	Is effect likely to be significant? Significance should be considered in terms of the extent, transboundary nature, magnitude and complexity, probability, duration, frequency and reversibility of any impact(s).
<ul style="list-style-type: none"> <li>peat land disturbance and/ or degradation leading to: carbon release, damage to habitats, affecting land stability or hydrology?</li> </ul>	No.	N/A.	No.
<ul style="list-style-type: none"> <li>pre-construction investigations e.g. boreholes, soil testing?</li> </ul>			
<ul style="list-style-type: none"> <li>construction, demolition, reclamation or excavation works?</li> </ul>	Yes.	<p>Construction works and activity will take place to deliver the development on the site and this would include the holiday caravan park and supporting infrastructure such as roads, paths, drainage and utilities.</p> <p>No demolition, reclamation or substantial excavation works of particular note are anticipated noting the characteristics of the application site and the scale and nature of the development.</p>	<p>No.</p> <p>The construction activity will be temporary and the extent of the impact for a development of this scale and nature will unlikely be significant. Any potential effects could be assessed and likely mitigated through best practice procedures and the use of planning conditions as part of the development management process.</p>
<ul style="list-style-type: none"> <li>underground works?</li> </ul>	Yes.	Underground works would likely be required in order to install the necessary drainage and utilities to support the development.	<p>No.</p> <p>Noting the scale and nature of the development, the level of underground works needed to deliver the infrastructure to support the caravan park is unlikely to be significant in EIA terms.</p>
<ul style="list-style-type: none"> <li>facilities for storage of goods or materials?</li> </ul>	No.	N/A	No.
<ul style="list-style-type: none"> <li>new road, rail, air or sea traffic or infrastructure during construction or operation or decommissioning?</li> </ul>	Yes.	The transportation of materials, structures and equipment will require to utilise surrounding road infrastructure. Additional vehicle traffic on surrounding road networks during the operational phase is also anticipated.	<p>No.</p> <p>The level of traffic and vehicular activity for the development is not anticipated to be significant in EIA terms. Any effects from traffic and vehicle movements during both the construction and operational phase will likely be localised and can be appropriately addressed and assessed through the planning application. As</p>

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			previously set out, a Transport Assessment and an review of the existing road network has been provided as part of the planning application submitted. Ayrshire Roads Alliance have also been formally consulted and there is no indication at this time that they have any specific issues with the development on roads or traffic grounds.
• new or diverted transmission lines or pipelines?	No.	N/A	No.
• any works requiring an authorisation under the Water Environment (Controlled Activities)(Scotland) Regulations 2005	No.	N/A	No.
• long-term/ongoing activity during restoration or decommissioning which could have an impact on the environment?	No.	N/A	No.
• influx of people to an area either temporarily or permanently?	No.	The proposals are to deliver a caravan park which will provide holiday lodge accommodation. On this basis, it is accepted that it will bring people to the site and will be a movement of people to and from the site who use the facilities.	No.  Given the nature/scale and extent of the proposed development, the activity of people coming and going from the site to use the extended area of the caravan park would unlikely be significant in EIA terms. Impacts of activity associated with the proposed development (including further intensification of use, additional trips, amenity matters), would all be assessed as part of the planning application.
• any other changes?	No.	N/A	No.
<b>2. Location of the Development</b>			
<b>(a) Existing land use</b>			

	Yes/No	Briefly describe	Is effect likely to be significant? Significance should be considered in terms of the extent, transboundary nature, magnitude and complexity, probability, duration, frequency and reversibility of any impact(s).
Are there existing land uses on or around the location which could be affected by the development, e.g. undeveloped land, greenfield land, homes, other private property, industry, commerce, tourism and recreation, public open space, community facilities, agriculture, forestry, tourism, water catchments, functional floodplains, mining or quarrying?	No.	As previously set out, the development proposal is proposed on previously undeveloped, agricultural land.  In terms of neighbouring land uses, the site is neighboured to the north and northwest by Crofthead Caravan Park. On the remaining sides, it is neighboured by agricultural parcels of land and their associated farm steadings.	No.  Matters of the acceptability of the principle of development, the compatibility with surrounding uses and the appropriate preservation of neighbouring uses amenity are considered to be best addressed through the planning application process, in which matters of design and siting will be assessed in detail.
<b>(b) Relative abundance, quality and regenerative capacity of natural resources in the area</b>			
Are there any areas on or around the location which contain important, high quality or scarce resources which could be affected by the development?	No.	In the first instance, it is relevant to note that the land is not classed as prime-quality agricultural land. Beyond this, there are no known important, high quality or scarce resources on the site.	No.
<b>(c) Absorption capacity of the natural environment</b>			
Are there any areas on or around the location which are protected under international or national or local legislation for their ecological, landscape and visual, cultural or other value, which could be affected by the development? Particular attention should be paid to wetlands, watercourses or other waterbodies, the coastal zone, mountains, forests or woodlands, nature reserves and parks.	No.	N/A	No.
Are there any groundwater source protection zones or areas that contribute to the recharge of groundwater resources?	No.	N/A	No.
Are there protected species in or around the location, for example European Protected Species, which could be affected?	No.	The site is not subject to, nor does it form part of any specific ecological designation(s) or categorisation(s).	No.  In the absence of any known ecological designations or receptors on the site, it is considered that the development management process provides sufficient scope to assess potential ecological impacts. Both



	Yes/No	Briefly describe	Is effect likely to be significant? Significance should be considered in terms of the extent, transboundary nature, magnitude and complexity, probability, duration, frequency and reversibility of any impact(s).
			Nature Scot and the Council's Biodiversity Officer have been formally consulted on the planning application.
Are there any routes or facilities on or around the location which are used by the public for access to recreation or other facilities, which could be affected?	No.	N/A.  The development site will connect into the internal road network already in place within the caravan park site and would utilise the long standing, existing access/egress in place.	No.  It is unlikely, based on the location and intended arrangements for the development that this proposal would impede or affect public access to nearby recreation and other facilities to a point which would be significant in EIA terms.
Are there any areas or features of historic or cultural importance on or around the location which could be affected?	No.	The site itself does not contain any features or designations of historic or cultural interest.	No.
Are there any areas on or around the location which are already subject to pollution or environmental damage e.g. where existing legal environmental standards are exceeded, which could be affected?	No.	N/A	No.
Is the development in a location where it is likely to be highly visible to many people?	No.	The site would be most visible from transient users along certain parts of the A77 and from isolated locations along the private road network which serves the caravan park which runs to the north east of the application site.	No.  No highly visible views of significance in EIA terms are anticipated.  The supporting statement which accompanies the planning application assesses the extent of the visual impact of the development and provides recommendations for mitigation. In this instance, it is considered that the development management process provides adequate scope to assess the extent of the visual and landscape impact.

	Yes/No	Briefly describe	Is effect likely to be significant? Significance should be considered in terms of the extent, transboundary nature, magnitude and complexity, probability, duration, frequency and reversibility of any impact(s).
Is the location of the development susceptible to earthquakes, subsidence, landslides, erosion, flooding or extreme or adverse climatic conditions which could cause the development to present environmental problems?	No.	The site comprises of a relatively flat undeveloped area of agricultural land and small pockets of woodland and tree belts on its periphery. The site has limited identifiable constraints on it with the exception of Annfield Burn which runs along the edge of the extreme southern boundary of the application site.	No.  The potential impacts of flooding are not considered to be significant in EIA terms. Implications of flooding can be appropriately assessed through the planning application process and SEPA and the Council's Flood Officer have both been formally consulted as part of this.

### **Conclusions**

Under the Regulations, aspects of the development proposal generally falls within Schedule 2. The checklist is a useful tool for the purposes of identifying the wide range of environmental receptors which could be affected by proposed development and considering the proposed development against the selection criteria relevant to the EIA process.

As set out above, from the assessment undertaken in accordance with the Regulations and Circular 01/2017, and taking into account the submitted screening report, the Council concludes that the proposed development for a change in use of field to form extension to an existing holiday park to site an additional 150 holiday lodges, as shown on the map attached to this document, is unlikely to result in effects on the environment which are sufficiently significant to require the submission of an environmental statement or which require further assessment through the EIA process. The screening opinion therefore concludes that an Environmental Impact Assessment (EIA) is not required in this instance.

