



Planning Dept
Dumfries and Galloway District Council

BY EMAIL ONLY

18 August 2024

Dear Sors,

Planning Application 24/1522/Ful

GROUND RE-PROFILING TO RAISE EMBANKMENT TO THE WEST AND SOUTH, ROCK ARMOUR PROTECTION TO RE-PROFILED EMBANKMENT, FORMATION OF HARDSTANDING AREA, INSTALLATION OF 2 SEPTIC TANKS, OUTFALL STRUCTURE WITH SCOUR PROTECTION, 1 NEW DRAW-OFF KIOSK, 1 NEW VENTILATION COLUMN AND ASSOCIATED WORKS (the Application)

I write as Chairperson of this Association. I attach the Community Association objections to this application as an appendix to this letter.

Please do not hesitate to contact me if you feel it necessary.

Yours faithfully

David Gilbert

BSC Hons, Dip Arb, FRICS FCI Arb IRRV Hons

Chairperson



APPENDIX - FORMAL OBJECTION

Planning Application 24/1522/Ful

GROUND RE-PROFILING TO RAISE EMBANKMENT TO THE WEST AND SOUTH, ROCK ARMOUR PROTECTION TO RE-PROFILED EMBANKMENT, FORMATION OF HARDSTANDING AREA, INSTALLATION OF 2 SEPTIC TANKS, OUTFALL STRUCTURE WITH SCOUR PROTECTION, 1 NEW DRAW-OFF KIOSK, 1 NEW VENTILATION COLUMN AND ASSOCIATED WORKS (the Application)

General

The need for improved sewerage provisions is recognised. The objections raised to the Application relate to the design, implementation, and subsequent operation and maintenance of the facility.

Design and the Local Plan

First and foremost, the Application does not reflect the requirements for any development in Glencaple as set out in the "Glencaple Village Design Statement" (the Statement), a requirement of the Local Plan. Points of note within the Statement, in so far as they apply to this application are:

"The open spaces are important to the village and should be maintained and enhanced.."

"Stonewalls are the usual form of boundary treatment..."

"The quayside represents the prime opportunity for enhancement of the public spaces in the village and greater use of the open space in the village should be encouraged."

"The merse is the dominant view from the village and all built development on these areas should be resisted."

The Application does not reflect any of these specific points or acknowledge the historical importance of the Application area in the centre of the village.

Design Objections

The landscape and design do not fit with the village in any way. The site is situated in the centre of Glencaple, an historic and picturesque village that is part of the National Scenic Area (NSA).

The opportunity to enhance what will ultimately be open space should be at the forefront of this design but is not.

The following points are made:

It is important that the site is in keeping with the immediate area being an historic quay dating from around 1747 and which served as a port for Dumfries and a ship building centre.

Not only is it important that the view from the village is in keeping but also that from the river and the merse opposite.

Rock armour as proposed is wholly unacceptable. It is not in keeping with the adjoining quay. A redesign of all external parts should take place so that all visible boundary surfaces above ground/low water level comprise sandstone blocks mirroring the quay construction. This should include the river, village, Boathouse and south sides. The kiosk should be similarly stone clad.

The vent pipe is a major intrusion in both terms of potential odours and aesthetically. It should be extended to a height above that of the Boathouse to avoid adverse effect on that business and the Nith Hotel Restaurant opposite. It should

All correspondence unless otherwise advised to:

Caerlaverock Community Association, c/o Cedrum, Kelton, Dumfries DG1 4UA

W: www.caerlaverock.org.uk E: caerlaverockcommunity@gmail.com



be disguised to form part of the historic street/quay scene, such as a mast or flag pole. Its specific effect on that business should be assessed by consultation and the design amended to mitigate/remove potential detrimental effects.

The finished Application area should be designed to provide public open space. There is currently a footpath across it and this should be retained with appropriate access points at each end. Given the lack of open space in the village this new level area above high water level should enhance the village experience. It should become a valuable, integrated part of the village with, for example appropriate seating and potential picnic/viewing areas.

The tanker bay is over engineered and should be more sympathetically incorporated into the design. Given the minimal use this will have the space should be available for public use too. Guard rails are unsympathetic to the area; instead reinforced sandstone walls should be used to reflect the local area and the Statement.

Environmental Objections

Although it is stated there is no evidence of hedgehogs they are frequently present both in the front and back garden of Sanderling opposite. It can reasonably be expected that they are therefore present on the merse across the road and consequently the Application area.

Given that strimming has been carried out by the applicant during breeding season this has potential to have skewed the ecological assessment in favour of the Applicant

Archaeological Objections

The excavation for the tanks is on the site of the "Patent Slip" which was used for launching the ships built on the "Sanderling" site. There may be the remains of foundations of the Slip and other structures of historic importance. It is therefore incorrect to assume that the site is without archaeological merit.

Development Period

The development period is noted and will have a significant impact on village life, local businesses and tourism. Whilst noting the estimated period we expect that a longer period will need to be anticipated depending on weather and tide conditions. The following concerns have not been addressed in the application that we can see:

Parking by the construction team should not be permitted on any village roads. These are already congested as many houses, (e.g those opposite the application site), have no parking provision within their curtilages.

The Application makes no provision for contractors' vehicles within the site. All such vehicles should be accommodated including potential for overspill. No parking should be permitted on the quay as this is needed by local businesses; Vintage on the Nith, The Nith Hotel and The Boathouse for their customers. The design must be amended to provide adequate on-site parking for all associated vehicles.

During the development period the Applicant should be cognisant of any adverse effect on the local economy offering business compensation where losses can be proven.

Given the narrow roads, 20 mph speed limit, and lack of footpaths suitable traffic management should be in place which minimises impact on the local community at all times.

Operation and Maintenance

Concerns exist as to both the future operation and ongoing maintenance of the site on completion of the development. The application does not address these.

Operation, and in particular tankers visiting site, should be restricted to normal daytime hours so as to minimise impact on housing opposite.



Areas such as the Glencaple Quay, footpath and verges are maintained by Caerlaverock Community Association, a “not for profit organisation”, with no formal income. Given the importance of this site in the centre of the village it is imperative that future maintenance obligations are incorporated by planning condition.

Conclusion

Whilst the need for adequate modern sewerage provision is accepted the Application fails to address the requirements of the Local Plan and Statement. It should be refused and remitted for re-design after formal community consultation.