

Perth and Kinross Council  
Development Management Committee – 16 July 2014  
Report of Handling by Development Quality Manager

**Alterations to stable block at Causeway Cottage, Scotlandwell, Kinross**

Ref. No: 12/01935/FLL  
Ward No: 8 Kinross-shire

**Summary**

This report recommends approval of this detailed application for alterations and re-roofing of a stable block at Causeway Cottage, Scotlandwell.

**BACKGROUND AND DESCRIPTION**

- 1 The application site is a 0.5 ha site at Loch Leven Equestrian Centre which is situated approximately 1km to the south of the village of Scotlandwell and accessed off the adjacent B920 to the east. The site is approximately 0.75 km to the east of Loch Leven. The Scottish Gliding Centre lies immediately to the west of the site.
- 2 The application site comprises an existing storm damage L shaped stable block; a riding school/ménage area; an existing office and the access road into the equestrian centre from the B920. To the south west of the site within the applicant's ownership is an existing cattery comprising a grouping of single storey buildings.
- 3 This application is for the restoration of an existing stable block following extensive storm damage and an amended roof design which would replace a mono-pitched sloping roof with a double pitched roof. Materials include steel portals with columns and rafters with purlins and clad to ground level with plastisol box profile cladding in juniper green. The roof cladding consists of 6 inch profiled cement cladding in natural grey with PVC downtakings. The roof ridge extends to 4.46 m. The refurbished stable block is intended to tack onto a previously consented stable unit to the east of the existing stables.
- 4 Due to the proximity of the application site to Portmoak Airfield issues in relation to airfield safeguarding have been raised. An application for a dwellinghouse at this site under 09/00936/FLL and an application for an extension to the existing cattery and office under 13/01312/FLL are also presented to this Committee.

**NATIONAL POLICY AND GUIDANCE**

**Scottish Planning Policy 2014**

- 5 The Scottish Planning Policy (SPP) was published on June 23 2014. It sets out national planning policies which reflect Scottish Ministers' priorities for operation of the planning system and for the development and use of land. The

SPP promotes consistency in the application of policy across Scotland whilst allowing sufficient flexibility to reflect local circumstances. It directly relates to:

- the preparation of development plans;
- the design of development, from initial concept through to delivery; and
- the determination of planning applications and appeals.

Of relevance to this application are:

- Paragraphs 74 - 83: Promoting Rural Development
- Paragraphs 92 - 108: Supporting Business and Employment.

### **DEVELOPMENT PLAN**

- 6 The Development Plan for the area consists of TAYplan Strategic Development Plan 2012 – 2032 and the Perth and Kinross Local Development Plan 2014.

#### **TAYplan Strategic Development Plan 2012 – 2032**

- 7 Under the TAYPlan the principal relevant policy is:-

#### **Policy 3: Managing TAYplan's Assets**

- 8 Safeguarding resources and land with potential to support sustainable economic growth.

#### **Perth and Kinross Local Development Plan (PLDP) 2014**

- 9 The application site is within the landward area of the plan where the main relevant policies are:-

#### **ED3: Rural Business and Diversification**

- 10 Favourable consideration will be given to the expansion of existing businesses and the creation of new businesses within or adjacent to existing settlements in rural areas. Outwith settlements, proposals may be acceptable where they offer opportunities to diversify and existing business or are related to a site specific resource or opportunity.

#### **EP13 Airfield Safeguarding**

- 11 Developments will be refused if they are likely to have an impact on the safe operation of aircraft from Portmoak Airfield. Applicants for planning consent within this area may be required to provide an independent assessment of the impact on the safe operation of the existing facility, prepared by a suitably qualified person.

## **OTHER POLICIES**

### **Circular 2/2003 Safeguarding of Aerodromes, Technical Sites and Military Explosives Storage Areas**

- 12 Operators of licensed aerodromes which are not officially safeguarded, and operators of unlicensed aerodromes and sites for other aviation activities (for example gliding or parachuting) should take steps to protect their locations from the effects of possible adverse development by establishing an agreed consultation procedure between themselves and the planning authority or authorities. One method, recommended by the Civil Aviation Authority to aerodrome licensees, is to lodge a non-official safeguarding map with the planning authority or authorities. Planning authorities are asked to respond sympathetically to requests for non-official safeguarding. Planning permission should not be refused simply because a proposal is one requiring consultation.

#### **Civil Aviation Authority**

- 13 CAP 168 "Licensing of Aerodromes", April 2011;  
CAP 738 "Safeguarding of Aerodromes", December 2006;  
CAP 793 "Safe Operating Practices at Unlicensed Aerodromes", July 2010;

#### **British Gliding Association**

- 14 BGA Club Briefing: Aerodrome Safeguarding  
BGA Site Operations Manual, Chapter 12 Airfield Safeguarding.

#### **Perth & Kinross Council's Airfield Safeguarding 2012**

- 15 This guidance provides details of designated safeguarding zones for each unlicensed airfield in Perth and Kinross which includes Portmoak, Balado, Strathallan and Errol. Safeguarding assists the Planning Authority to make reasonable decisions in response to local development proposals.

## **SITE HISTORY**

- 16 PK95/0581 An application for the erection of an equestrian centre and house (in outline) at the site was refused in June 1996.
- 17 PK95/1671 Outline consent was approved for the equestrian centre, and for the siting of a residential caravan, in March 1996 against officers' recommendation.
- 18 PK96/1259 Detailed consent for an equestrian centre was granted in October 1996.
- 19 PK97/1154 Consent granted in October 1996 for an amendment to the above consent for an equestrian centre which included the provision of temporary accommodation until February 1999.

- 20 99/00121/FUL An application for an all weather surfaced outdoor school, new vehicular access, an extension to the period for use of temporary accommodation unit and detailed consent for a house was withdrawn before determination.
- 21 99/00766/FUL Application for the formation of an all weather surfaced outdoor school, revised access and amendment to location of isolation box/field shelter was refused in July 1999. In May 2000 the Scottish Minister's Reporter sustained the appeal and granted planning permission. The Reporter concluded that the schooling area would not lead to any more intensive use of the site, and thereby implications for gliding activities, than would the use of the ground as part of the originally approved equestrian centre.
- 22 99/01521/OUT In March 2000 outline planning permission was refused against recommendation on a site to the east of the current application site for the erection of a house. In December 2000 an appeal against refusal was also dismissed (P/PPA/340/189).
- 23 00/01194/FUL In February 2001 planning consent was refused for the erection of a house and alterations to the site layout at the riding centre, following a recommendation for approval subject to a Section 75 Agreement. This application was submitted following a previous refusal under 99/01521/OUT and sought to provide a new development package with an amended layout and a Section 75 to avoid prejudice to gliding activities by restricting use of fields to the north of the stables.
- 24 05/00385/FLL In June 2005 planning consent was granted for the erection of a house and garage to the 450m to the north of the site near Wellburn on the basis of operational need. The occupancy of this house has not been restricted by condition. It is unclear why this was not conditioned.
- 25 05/00384/FUL In January 2006 planning consent was granted for the erection of a cattery to the west of the current application site and extension to the stables.
- 26 09/00937/FLL In November 2009 erection of replacement stables and an extension to the office was approved.
- 27 09/00936/FLL In January 2010 erection of a dwellinghouse was approved on the application site under the Council's Planning Scheme of Delegation. This consent was subsequently reduced in the Court of Session and has effectively been referred back to the Council for re-determination.
- 28 11/00588/FLL An application for the siting of a temporary static caravan in retrospect at Causeway Cottage is pending consideration. Withdrawn February 2014.
- 29 13/01312/FLL Extension to cattery and office at Causeway Cattery. Pending decision.

- 30 13/01858/FLL Erection of a dwellinghouse and garage (as an alternative location to the dwellinghouse proposed under application ref 09/00936/FLL) Pending decision.

## CONSULTATIONS

- 31 **Scottish Water** – No objections
- 32 **Scottish Gliding Union (SGU)** – Objection
- 33 **Shell Exploration & Production** – No objection

## REPRESENTATIONS

- 34 Two letters of representation were received including one from the Scottish Gliding Centre objecting to the proposal where the main issues raised can be summarised:-

- Intensification of use under the flight path
- Objection to establishment of the stables
- Increase in height of the stables closer to the operational area of the airfield
- Inappropriate land use
- Unacceptable design

## ADDITIONAL STATEMENTS

35	Environment Statement	Not required
	Screening Opinion	Not required
	Environmental Impact Assessment	Not required
	Appropriate Assessment	Not required
	Design Statement / Design and Access Statement	None
	Independent Aviation Assessment	Submitted

## APPRAISAL

### Policy

- 36 Sections 25 and 37(2) of the Town & Country Planning (Scotland) Act 1997 (as amended) requires the determination of the proposal to be made in accordance with the provisions of the Development Plan, unless material considerations indicate otherwise. The determining issues here are whether the proposals comply with Development Plan policy or if there are other material considerations, which justify a departure from policy.

### Policy – Aviation Safety

- 37 The primary issue to be addressed is whether the alterations and re-roofing of the stable block are likely to have an impact on the safe operation of aircraft

from Portmoak Airfield in terms of Policy EP13 Airfield Safeguarding of the Perth and Kinross Local Development Plan (PLDP) 2014.

- 38 The SGU have objected to the proposed alterations and re-roofing of the stable block on the basis that it would have a detrimental impact on the operational safety of Portmoak Airfield. In order to assess this the Council commissioned an independent aircraft safety report carried out by Dr Mark Eddowes of Eddowes Aviation Safety Ltd. Both the applicant and the SGU had agreed that Dr Eddowes was considered an impartial consultant and that they had no dealings with him in the past. The conclusions reached in Dr Eddowes assessment are outlined below. The full assessment is detailed in Appendix 1. Main conclusions:-

“The proposed amended roof design for the stable block (12/01935/FLL) involves an apex roof rather than a mono-pitch design which would increase the overall building height by around 1 metre and locate the high point slightly closer to the airfield boundary. Having regard to the height and location of the building, it is found that there would be no penetration of an approach surface meeting an appropriate specification for the obstacle limitation surface (OLS) for the protection of flight paths in that area. In principle, the increased height of the stable roof may be expected to increase the risk of collision during an undershoot event where an aircraft touches down short of the airfield. However, the risk of collision may still be expected to be acceptably small. Having regard to the apex roof slope, the amended design might also provide some potential mitigation in respect of the probability of fatality in the event of a collision, involving a glancing and bouncing impact in which fatality would be less likely than during impact with a vertical wall. On that basis, it is questionable whether the amended design would, in practice, lead to an increased risk of fatality. Overall, it is concluded that the proposed stable restoration with the amended roof design would not have a material impact on the safety and efficiency of operations at Portmoak Airfield.”

- 39 With regard to the issue of intensification raised by the SGU Dr Eddowes concluded:-

“The SGU has objected to the development on the basis of *“the apparent intensification of use”*. It is not a matter for this review to consider whether or not the proposal constitutes an intensification of use. However, it is worth noting that an intensification of use would not necessarily represent a significant threat to future operational safety and efficiency at Portmoak Airfield. Some loss of amenity in terms of the availability of obstacle free approach areas along the eastern boundary of the airfield has arisen from the previous permissions in relation to the Causeway Cattery and Equestrian Centre. Further development within the footprint of the existing development is judged not to add materially to that previous loss of amenity. Extension of development beyond the existing site footprint would be a legitimate concern of the SGU but would not arise under this application.”

### **Scale and Design**

- 40 The proposed alterations and design of the re-roofing of the stable block are minor in scale and considered to be acceptable within this existing building grouping and will not have any detrimental impact on the character or appearance of the area.

### **Landscape and Visual Amenity**

- 41 The proposed alterations and re-roofing of the stable block within the existing building grouping will not have any additional adverse visual impact on the wider area or surrounding countryside.

### **Drainage and Flooding**

- 42 The proposed development is located adjacent to the flood envelope of the River Leven as shown on SEPA's indicative (1 in 200) fluvial flood map and as such is considered to be at medium to high risk of flooding from this source. However the application is for the reroofing of an existing building and as such does not increase the number of properties at risk of flooding.

### **Road Safety**

- 43 The access to the application site would be via an existing access off the public road. There are no objections to the proposals on road safety grounds.

### **Pipeline**

- 44 The application site is within the consultation zone for a nearby Shell pipeline, however, after having consulted Shell they have stated that they would have no objections to the proposed alterations or re-roofing of the stable block as it will not affect the integrity or status of their operations in this vicinity.

### **Economic Benefits**

- 45 The improvement of the existing premises at the site will be advantageous in supporting the viability of the business into the future.

### **Sustainability**

- 46 New development should meet local needs and enhance access to land, employment facilities, goods and services. The proposed improvements to the business premises are considered to be acceptable in terms of maintaining the sustainability of the existing business at Causeway Cottage.

### **LEGAL AGREEMENTS REQUIRED**

- 47 Not required.

## **DIRECTION BY SCOTTISH MINISTERS**

- 48 Under the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2008, regulations 30 – 32 there have been no directions by the Scottish Government in respect of an Environmental Impact Assessment screening opinion, call in or notification relating to this application.

## **CONCLUSION AND REASON FOR RECOMMENDATION**

- 49 As outlined above the Council have commissioned an Aviation Safety Report carried out by Dr Mark Eddowes where it was concluded that the proposed alterations and re-roofing of the stable block was found to be acceptable in terms of airfield safeguarding. The scale and design of the proposal is acceptable. The expansion and improvement of the existing business at Causeway Cottage is supported through Development Plan policy on Rural Business and Diversification and therefore recommended for approval.

## **RECOMMENDATION**

### **A Approve the application subject to the following conditions and reasons:**

- 1 The proposed development must be carried out in accordance with the approved plans, unless otherwise provided for by conditions imposed on the planning consent.

Reason - To ensure that the development is carried out in accordance with the plans approved.

### **B JUSTIFICATION**

The proposal is considered to comply with the Development Plan and the material considerations available add weight to a recommendation of approval.

### **C INFORMATIVES**

- 1 This planning permission will last only for three years from the date of this decision notice, unless the development has been started within that period. (See Section 58(1) of the Town and Country Planning (Scotland) Act 1997 (as amended).
- 2 Under Section 27A of the Town and Country Planning (Scotland) Act 1997 (as amended) the person undertaking the development is required to give the Planning Authority prior written notification of the date on which it is intended to commence the development. A failure to comply with this statutory requirement would constitute a breach of planning control under section 123(1) of that Act, which may result in enforcement action being taken.
- 3 As soon as practicable after the development is complete, the person who completes the development is obliged by Section 27B of the Town and Country

Planning (Scotland) Act 1997 (as amended) to give the Planning Authority written notice of that position.

Background Papers: 2 letters of representation  
Contact Officer: Mark Williamson – Ext 75355  
Date: 26 June 2014

**Nick Brian**  
**Development Quality Manager**

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## **Appendix 1: Aviation Consultant's Report from Dr Mark Eddowes on behalf of the Council**

### **Application 12/01935/FLL: Stable Block**

#### **2.1 NATURE OF THE PROPOSAL**

- 2.1 The proposal, as identified in the application, is for the *“restoration of storm damaged stable building with amended roof design (no increase in previous footprint)”*. Based on the available drawings provided with the application, it is understood that the proposed development will occupy the existing L-shaped concrete base which houses the current stable building. It will locate into a new stable unit which has been the subject of a separate application (09/00937/FLL) and for which permission has been granted. The elevation provided identifies the apex height of the proposed amended roof design as 4.460 m which is indicated on the drawings to be *“the same as the new unit”*. The *“new unit”* in this context is understood to be the unit for which permission has been granted under application 09/00937/FLL.
- 2.2 In their letter of objection, the SGU point out that the height of the new unit granted permission under application 09/00937/FLL was identified to be 4.445 m above local ground level, comprising a pitched roof height of 1.845 m above an eaves height of 2.600 m. The SGU identify the height of the existing stable roof as 3.400 m, based on the Planning Officer's report on application 09/00937/FLL. The existing stable roof is identified to be mono-pitch rather than having a central apex, sloping down towards the airfield boundary. The overall effect of the proposal is therefore both to increase the maximum height of the roof and place the high point of the roof slightly closer to the airfield boundary. Taking account of the slight offset of the alignment of the stable block with the airfield boundary, the roof apex is estimated to be between about 22 m and 26 m from the airfield boundary.
- 2.3 There is also a proposed office/store in the vicinity of the stable block that was granted permission under application 09/00937/FLL. This building is located immediately North-west of the stable block in the direction of the airfield boundary and its central roof apex is identified as being 4.172 m above local ground level. The apex is estimated to be located between about 12 m and 14 m from the airfield boundary.

#### **2.2 SAFETY AND OPERATIONAL IMPACTS**

- 2.4 In accordance with the assessment presented in the previous review report, the primary issues to be considered in respect of the safety and operational impacts of the development proposal are as follows:
- The building height in relation to flight paths, having regard to appropriate obstacle limitation surface (OLS) criteria and other obstacles in the vicinity of the building;
  - Undershoot risk, having regard to the existing obstacle environment.

- 2.5 As discussed in the previous review report, the OLS applicable at Portmoak are not precisely defined and the requirements are open to interpretation to some extent. In accordance with the diagram shown in Figure 5.2 in the previous review report, the perimeter safeguarding proposals put forward by Chris Hedge on behalf of the applicant and an approach surface based on CAP 168 criteria provide for broadly similar height restrictions outside the airfield boundary. Within the limits of the precision to which the requirements for approach operations can be identified, both specifications are judged to provide an appropriate level of protection.
- 2.6 As indicated in Figure 5.2 in the previous review report, for distances closer to the airfield boundary, the perimeter safeguarding specification is marginally more restrictive than the approach surface specification. Based on the perimeter safeguarding specification (a 3 m screen height at the surface origin at the airfield boundary and a 1 in 15 slope of the surface) and a distance of 22 m from the boundary, a height limit of 4.467 m is identified at the roof apex location, as compared with the proposed roof apex height of 4.460 m. In contrast, the height limit against these criteria at the roof apex of the existing office/store is estimated to be 3.767 m, as compared with the actual height of 4.172 m. It is estimated that neither building roof would exceed the height limit for the CAP 168 surface where the surface origin is located so as to provide for a 90 m Runway End Safety Area within the airfield boundary. A minimum height limit of 5.6 m is identified to apply at the stable roof apex location ( =  $(90 + 22) \times 5\%$  ) according to the CAP168 OLS specification for a Code 1 aerodrome.
- 2.7 Overall, it is concluded on that basis that the height of the roof apex should not be considered unacceptable from the perspective of the requirements for the safeguarding of flight paths.
- 2.8 From the perspective of undershoot risk, the existing obstacle environment at the Causeway Cattery and Equestrian Centre already represents a potential threat to aircraft operating at Portmoak. In accordance with the consideration of this issue presented in the previous review report, operations at Portmoak should already take account of this risk and should be undertaken in a manner that will mitigate undershoot risk. Appropriate operational measures to mitigate this risk are identified as being avoidance of flight directly over the developed site, where practicable, and selection of an appropriate aiming point within the airfield that will minimise the likelihood of landing short of the airfield outside its boundary.
- 2.9 The technical analysis of undershoot risk presented in the previous review report led to the conclusion that, given the existing constraints, the proposed cottage under application 09/00936/FLL would not have a material impact on the available width of the preferred safe approach area to Portmoak from the East and would not materially impact on operational safety and efficiency. The same general conclusions apply in respect of the amended stable roof design under application 12/01935/FLL. The majority of approach operations should be adopting approach paths which avoid flight over the stables. For the small proportion of approaches that may take place over the developed area of the Causeway Cattery and Equestrian Centre any additional risk that may arise

from the amended roof design will be a relevant consideration in determining the application but this is assessed to be relatively small, as described further below.

- 2.10 The additional undershoot risk will be dependent upon the increased collision area presented by the new structure compared with that presented by the existing obstacle environment. As noted earlier, the footprint of the proposed and the existing stables are the same, such that the width across which the safety of an approaching aircraft that undershoots may be compromised by the stables will not be altered by the amended roof design.
- 2.11 However, the increased height of the amended roof design may lead to a scenario in which a collision would occur when this might have just been avoided if the current roof design and maximum roof height were maintained. It can be envisaged that an aircraft following a relatively shallow angle trajectory at a height marginally above the current roof height might collide with the roof of the amended design when it otherwise may have been able to reach the airfield. Whilst such a scenario is possible, it seems doubtful that it is sufficiently likely so as to give rise to a significant increase in the risk.
- 2.12 Provision of a quantitative estimate of the increase in risk would require knowledge of the distributions of aircraft heights and descent angles which is not available for glider operations. Some information is available concerning the distribution of undershoot locations for powered aircraft which has been employed<sup>3</sup> to estimate undershoot risk dependence upon the length of Runway End Safety Area available before the landing threshold. In principle, this model can be applied to standing objects but this requires an assumption to be made concerning the aircraft approach angle. Assuming a worst case of 1 in 20 for the approach angle as the minimum approach angle for a glider, a one metre height increase would correspond with a 20 m distance along the ground. On that basis, the model indicates that the increased roof height might increase the probability of collision with the stable block by a factor of around 2.5. Given that this estimate is based on empirical modelling of accident data for powered flight it must be treated with caution but it may be considered to be broadly indicative of the scale of the likely increase in collision probability. The increase in collision probability due to the increased height can be expected to be by more than a few percent but not by more than about a factor of ten.
- 2.13 Whilst, in itself, a relative risk increase by a factor of 2.5 might appear to be non-trivial, any relative increase in the risk associated with collision with the stable must be viewed in the context of the overall size of that risk. The estimated increase applies to undershoot scenarios along flight paths over the stables in which an aircraft will touch down somewhere, short of the airfield. The previous review report provided an estimate of the likelihood of an undershoot event giving rise to collision with the proposed Causeway Cottage, taking account of the assumed obstacle width. The risk of fatality as a result of collision was estimated to be between about 1 in 10,000 years and 1 in 150,000 years, according to the assumptions concerning identified mitigation factors. A similar estimate applies to collision with the stable block.

- 2.14 Taking account of the relative roof profiles of the existing and the proposed restored stables, it is questionable whether the increase in collision probability associated with the increased height would necessarily translate directly into an increase in the risk of pilot fatality. For the existing stables with a mono-pitch roof, a collision with the building will involve an impact with the East-facing wall, at a height of up to 3.4 m above the ground. For the proposed amended design with an apex roof, a collision with the building would involve an impact either with the East-facing wall, at a height of up to 3.05 m, or with the sloping roof, at a height of between 3.05 m and 4.46 m. Given the slope of the roof of 26.3° in the amended design, there would appear to some potential mitigation in respect of pilot fatality if collision were to occur with the roof rather than the wall of the building.
- 2.15 The force associated with a glancing and bouncing roof slope impact will be less than that associated with a perpendicular impact with the vertical wall. The probability of fatality would be expected to be relatively high for collision with the vertical wall and relatively low for collision with the sloping roof. Whilst increasing the overall building height, the amended design involves a shorter vertical wall than the current design which would be expected to reduce the probability of fatality associated with the perpendicular collision scenario. Any additional risk associated with the amended design will therefore require that the probability of fatality associated with a roof impact in the height range from 3.05 to 4.46 m is greater than the probability of fatality associated with a wall impact in the height range from 3.05 to 3.4 m. The probability of collision will be higher in the case of the roof collision scenario but the probability of fatality in the event of collision will be lower. Without reliable relative fatality estimates for the two different impact scenarios the extent to which the one factor (reduced vertical wall height) will compensate for the other (increased overall height) is uncertain. The judgement made here is that there is likely to be little if any increase in fatality risk associated with the amended design compared with the existing design.
- 2.16 It should also be noted that the existing office/store building already stands at a height above the current stable roof height, is less than 0.3 m below the height of the proposed amended roof design and occupies a location that is closer to the airfield boundary. This building can therefore be expected to present a collision risk during undershoot scenarios that is comparable with that associated with the amended stable design, across part of the lateral width presented by the stable block to aircraft approaching from the East. No increase in fatality risk during undershoot is therefore to be expected from the amended roof design for approaches over this part of the Causeway Cattery and Equestrian Centre.
- 2.17 The basis for the objection to the amended roof design from the SGU contained in the letter of 27 November 2012 is as follows:

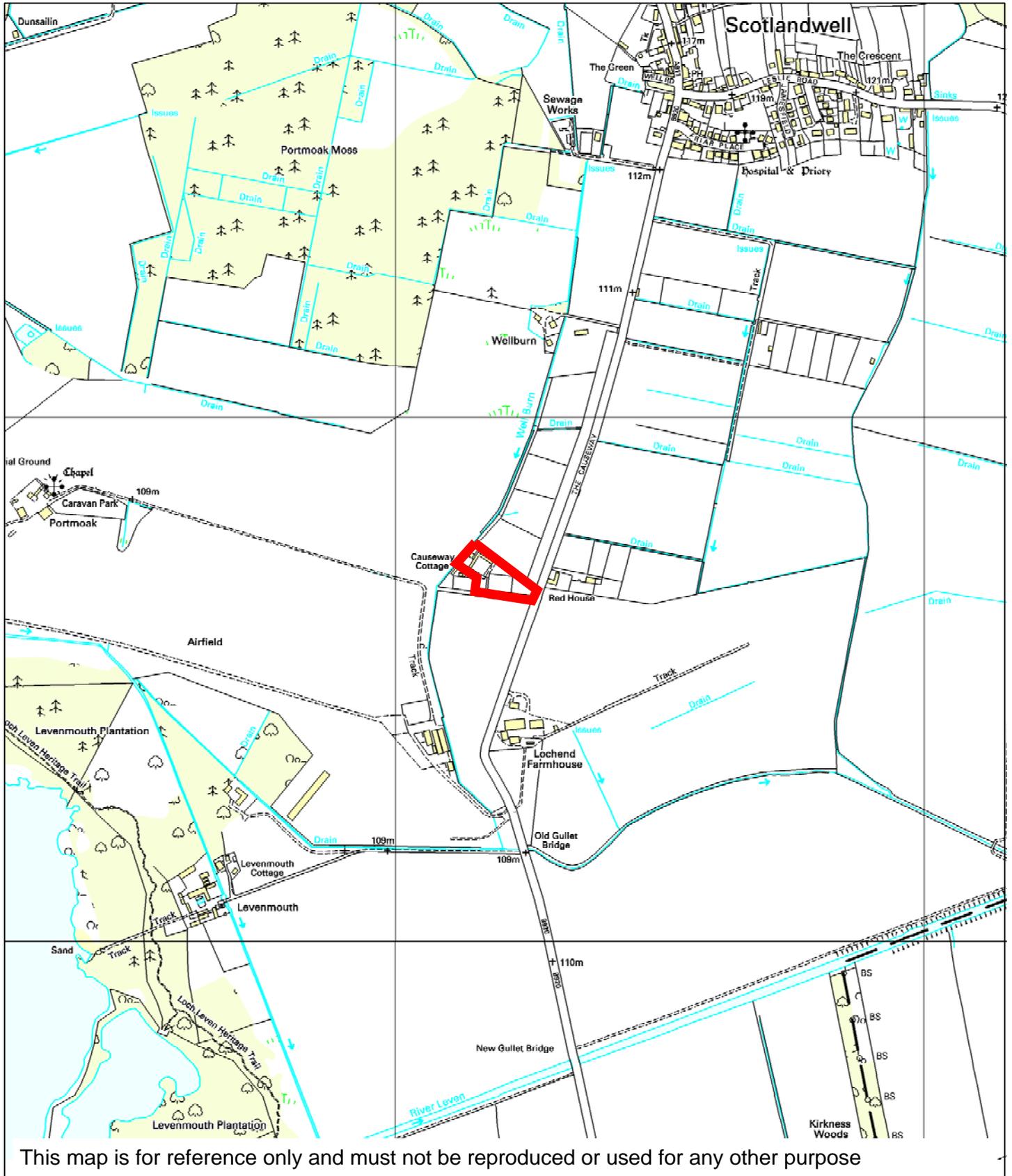
*“A pilot finding it necessary to make an approach over the stable would, therefore, have to allow extra clearance and land further into the airfield. On this point, our independent Airfield Safeguarding assessor has stated to the Council that the existence of structures close to the boundary that infringe the*

*Obstacle Limitation Surface does not provide a precedence for further degradation of safety for approaching aircraft.”*

As discussed above in Section 2.6, this assessment finds that the amended roof design would not lead to an infringement of an Approach Surface meeting an appropriate specification. In accordance with the assessment presented in the previous review report, the penetration identified by the SGU would arise only if the surface origin was placed unrealistically close to the airfield boundary such that no undershoot mitigation in accordance with CAP168 standards were to be provided within the airfield boundary. It can be agreed that the existence of structures close to the boundary that present a threat to safety would not justify proposals for amended or additional structures that would further degrade safety. The question is whether or not the proposal under consideration would lead to a material degradation of safety. The SGU has not provided any technical evidence that it would and the assessment undertaken by EAS has concluded that it would not.

- 2.18 As discussed in the previous review report, the existing obstacle environment at the Causeway Cattery and Equestrian Centre requires the adoption of safe operating practices at Portmoak Airfield for the minimisation of undershoot risk that will avoid approach over the site in general, including the stable block, so far as is practicable. Provided that appropriate operating practices are adopted, the risk associated with either the current stable block or the proposed amended design is judged to be sufficiently small to be acceptable. The extent to which the proposed amended design would, in practice, lead to an increase in fatality risk in the event of undershoot during approach over the stables is questionable. The conclusion reached in this review is that there would be little if any increase in this risk.
- 2.19 The SGU has objected to the development on the basis of *“the apparent intensification of use”*. It is not a matter for this review to consider whether or not the proposal constitutes an intensification of use. However, it is worth noting that an intensification of use would not necessarily represent a significant threat to future operational safety and efficiency at Portmoak Airfield. Some loss of amenity in terms of the availability of obstacle free approach areas along the eastern boundary of the airfield has arisen from the previous permissions in relation to the Causeway Cattery and Equestrian Centre. Further development within the footprint of the existing development is judged not to add materially to that previous loss of amenity. Extension of development beyond the existing site footprint would be a legitimate concern of the SGU but would not arise under this application.





Scale  
1:10000



Scale  
1:2500