

<b>ISS100</b>	<b>Business and Industrial Land: Blackwood, Colgrain</b>	
<b>Development plan reference:</b>	AFA 3/18 - Black Wood, Colgrain	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
Scottish Natural Heritage (01587)		
<b>Provision of the development plan to which the issue relates:</b>		
<b>Planning authority's summary of the representation(s):</b>		
<b>Scottish Natural Heritage (01587) - AFA 3/18</b>		
Proposal is adjacent to Inner Clyde Special Protection Area (SPA) and so requires assessment as part of the Habitats Regulations Appraisal (HRA) of this plan		
<b>Modifications sought by those submitting representations:</b>		
<b>Scottish Natural Heritage (01587) - AFA 3/18</b>		
Satisfactory conclusion of HRA of this plan.		
<b>Summary of responses (including reasons) by planning authority:</b>		
This area for action has already been subject to an HRA as it was included in the HRA which was done for the Adopted Local Plan in 2009. This area is now included in the HRA for the LDP.		
<b>Reporter's conclusions:</b>		
<b>Reporter's recommendations:</b>		

<b>ISS101</b>	<b>Redesignation of AFA 3/4: Craigendoran</b>	
<b>Development plan reference:</b>	AFA 3/4 - Helensburgh - Craigendoran AFA 3/4 - Helensburgh - Craigendoran	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
Helensburgh Study Group (00166) Dr Geoff Riddington (02068)		
<b>Provision of the development plan to which the issue relates:</b>		
<b>Planning authority's summary of the representation(s):</b>		
<p><b>Helensburgh Study Group (00166) - AFA 3/4</b> <b>Dr Geoff Riddington (02068) - AFA 3/4</b></p> <p>The need for action has been identified in the last 4 or 5 local plans. There has been 25 years of inaction. Nothing has happened in part because the planners have not "planned" anything, have not initiated challenges or commissioned ideas.</p> <p>AFA3/4 Helensburgh – Craigendoran Local, recreation/tourist development, this description is inadequate.</p> <p>The area features in both the Transport and Town Centre Strategies as a new Park and Ride facility to relieve parking loss in Helensburgh. A Park and Ride is basically a Transport development for commuters to Glasgow.</p> <p>On the area to the East the front half is both Foreshore and unusable because of underground waste water storage. With the creation of an appropriate sea wall, this could be a valuable tourist/recreation resource. It could feature a camp site linked to the John Muir/Three Lochs Ways and, the Argyll Canoe Trail.</p> <p>Some of the rear half of the site would be suitable for limited housing, possibly sheltered, if this is deemed compatible with policy SG LDP CST 1. However it should be noted that the whole area is designated as a Local Nature Conservation Site, in part due to rare butterflies, orchids and otters.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p><b>Helensburgh Study Group (00166) - AFA 3/4</b></p> <p>As a minimum it is suggested that the AFA description must be modified to; AFA3/4, Helensburgh</p> <p>- Craigendoran, Strategic: Transport, Tourism and Recreation.</p> <p>The Supplementary Guidance should provide guidance on what is proposed/acceptable even if this is in the broadest terms, showing what is and what is not acceptable. If the area is seen as potentially a valuable recreation resource with a connected transport/parking hub then it should say so. As a basic minimum, council policies for each AFA should be identified in the</p>		

Supplementary Guidance. Currently the statement in the Glossary “Area remits for these AFAs are being worked up in the Supplementary Information and Guidance report” should be demonstrated as accurate and implemented.

A detailed plan will be required (and this planning period be considered a priority) but that must not be used as a reason for doing nothing.

**Dr Geoff Riddington (02068) - AFA 3/4**

Amend to read:

AFA3/4 Helensburgh-Craigendoran Strategic, Transport Development, Environmental Improvement, Recreation and Tourist Development  
Ensure that the Priority for Action is High. (Priority List not yet stated)

**Summary of responses (including reasons) by planning authority:**

**Helensburgh Study Group (00166) - AFA 3/4**

**Dr Geoff Riddington (02068) - AFA 3/4**

Overview

In reviewing the adopted Argyll and Bute Local Plan (Core Doc ref xxxx) in preparation for the Proposed Local Development Plan, the Council has adopted a “light touch approach” and accordingly no changes have been made to either the extent or description associated with Area For Action (AFA) 3 /4. The description of this area for action as “Local” and for “recreation/tourist development” was endorsed by the reporters following the inquiry in to the Adopted Local Plan in 2009. (see production no xxxx)

In terms of the Helensburgh Town Centre Strategy, and also the Local Transport Strategy the issue of parking improvements to improve accessibility to Helensburgh Town Centre has been subject to a feasibility study (see production no xxxx) which looked at sites previously identified for a potential park and ride site together with addressing demands for additional commuter parking in the town. Following this study the Helensburgh and Lomond Area Committee have approved a strategy to achieve approximately 130 additional spaces in the town centre through the reconfiguration of existing on street parking. These reconfiguration works have been undertaken in conjunction with the CHORD proposals and are funded from SPT monies to improve access to the town centre.

The feasibility study has also identified Craigendorran Pier as an option for the provision of additional park and ride facilities. However, there are a considerable number of issues which require further feasibility studies, including assessment of potential land stability and contamination issues, and the satisfactory resolution of the currently substandard junction of Station Road and East Clyde Street. There is also the matter that the land in question is in the ownership of a third party. At this stage it is not certain that these issues can be resolved, and as yet the Council has made no allocation in its current spending programmes to do so. As such the proposed LDP does not include specific reference to the delivery of a park and ride in this location in order to avoid raising undeliverable community expectations with regard to the future delivery such a facility in this location.

The council submits that the description of this area for action for recreation and tourism related proposals would already allow for both the recreational and camp site facilities proposed by the objectors. That said, the development of the area for these purposes or for

any other use which is likely to result in additional vehicular use of the Station Road/ East Clyde Street Junction would require junction improvements.

The proposed Local Development Plan has retained the LNCS designation over the south eastern part of the area. The reasons for its designation are outlined in Production No xxxx and any proposals for development of this area would be expected to be proceeded by a Phase 1 environmental survey to assess the impacts of such development and to detail the further survey work or mitigation measures which might be required in order to ensure both EPS and the intrinsic qualities of the designated area are not damaged as a result of the development which might be proposed. Use of part of the area for sheltered housing might be considered appropriate if this was ancillary to, or enabling development associated with a tourism or recreational use requiring a coastal location.

### Conclusions

#### **Helensburgh Study Group (00166) - AFA 3/4 Dr Geoff Riddington (02068) - AFA 3/4**

The current designations for the AFA as detailed in the Proposed Local Development Plan area considered appropriate by the Council with no need for further amendment. Whilst a feasibility study in to the provision of park and ride in Helensburgh has confirmed Craigendorran Pier as an option for a future park and ride facility capital funding has yet to be allocated.

As an interim measure the Council has reconfigured on street parking in the town centre which has helped to address the short term commuter parking requirements and while the feasibility study demonstrates a likely demand for additional parking by 2023 the Council has not allocated a budget to address this need and in any event there is a requirement for further site and ground investigation works, plus improvements to the wider road/junction network. In addition, the area covered by AFA 3/4 remains in the ownership of a third party which makes it too early to confirm the transport aspect of its use or to identify it as a Strategic Priority.

#### **Dr Geoff Riddington (02068) - AFA 3/4**

In relation to identifying the area for Environmental Improvement, this is likely to come about as a result of any recreational or tourism use of the area. The land is not currently owned by the Council and it has not identified a priority need for such improvements in this area at this time and accordingly the Council can see no requirement for an amendment to the plan to be made.

#### **Reporter's conclusions:**

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#### **Reporter's recommendations:**

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<b>ISS102</b>	<b>Business and Ind. Land: Craigendoran</b>	
<b>Development plan reference:</b>	<b>BI-AL 3/1 - Helensburgh - Craigendoran</b>	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p><b>Helensburgh Green Belt Group (00167);</b>  <b>Helensburgh Community Council (00135);</b>  <b>Scottish Natural Heritage (01587);</b>  <b>Helensburgh Study Group (00166):</b></p>		
<b>Provision of the development plan to which the issue relates:</b>		
<b>Planning authority's summary of the representation(s):</b>		
<p><b>Helensburgh Green Belt Group (00167)</b></p> <p>The Objector contends that business categories at the business site at the south east of Helensburgh are Class 4, Class 7 and sui generis car show rooms. Retail is excluded, but the advice of A&amp;BC planning officials was over ruled and Waitrose was allowed in.</p> <p>HGBG wishes to record its worry that, with the Waitrose precedent, there will be other attempts to put retail outlets there, to the further damage of the Helensburgh town centre. HGBG agrees with the proposal to split the remaining vacant business site in two, with the south-easterly end being retained for Class 4, Class 7, and <i>sui generis</i> car show rooms, but the north westerly half (i.e. next to Waitrose) being designated for housing. That would block further retail development and in-town harm.</p> <p><b>Helensburgh Community Council (00135)</b></p> <p>The new Waitrose foodstore at Craigendoran due to open in autumn 2013 (<i>now opened</i>) is an edge of town site at Craigendoran on land currently allocated for business Use Classes 4,7 and for the display of motor vehicles (BI-AL 3/1). After the store opens most of the site will still remain available for business use.</p> <p>As of April 2013 there has been no demand from businesses wanting to come on site and HCC does not see any such demand forthcoming in the foreseeable future. In 2012 HCC received a written assurance from A&amp;BC that only such businesses would be allowed on the remainder of the business site and any planning applications for further retail stores there would be resisted strongly. Nevertheless HCC is concerned that by allowing Waitrose to develop there a precedent will have been set and other major retailers will be attracted to build alongside. If successful that would create a rival town centre for Helensburgh posing a much more serious threat to the viability of both local shops and national stores there.</p> <p><b>Helensburgh Study Group (00166)</b></p> <p>The Helensburgh Study Group ('The Study Group') gives the following reasons for requesting a change in the use of the business site coded BI-AL-3/1 on Map 3 of the Helensburgh and Lomond maps dated February 2013 and the Business and Industry Allocation on page 67 of the PLDP.</p>		

In the **current** Local Plan, the business categories were (and remain in the PLDP) Class 4, Class 7 and *sui generis* car show rooms. Retail was excluded, correctly in the view of the Study Group.

The Study Group understands that there have been no bids at all for non-retail businesses of the approved classes. Further, contrary to the land's designation and the advice of the planning officers, the Council permitted Waitrose to create a supermarket at the narrow north-western area of the site. This supermarket now challenges existing retail in the town centre.

In the view of the Study Group, the biggest single danger is that more retail outlets will be attracted to the site, with further damage to the town centre. The question, then, is how can that land best be protected from further retail incursion? It is clear that the Council's own business class designations are not strong enough to prevent it. It is also clear that there has been no demand for the business site, perhaps because both serviced and un-serviced business land is available in Dumbarton and the Vale of Leven, both of which are better located for access to the Central Belt and beyond.

**Scottish Natural Heritage (01587)**

Allocation is adjacent to Inner Clyde Special Protection Area (SPA) and so requires assessment as part of the Habitats Regulations Appraisal (HRA) of this plan.

**Modifications sought by those submitting representations:**

**Helensburgh Green Belt Group (00167)**

HGBG considers that dividing the remaining part of the business site in to two is an appropriate step. The section closest to Waitrose could be allocated for housing and the part furthest (i.e. to the south -east) remain as a non- retail business site. This could provide about 70 housing units and would help block further retail incursion to the site.

**Helensburgh Community Council (00135)**

HCC position on the further development on this site is that :

- Further retail development on the site to be resisted strongly
- If there has been no demand for "clean" Class 4 and/or business use after 2018 the land either reverts to Green Belt, or housing on part of the remaining business site

**Helensburgh Study Group (00166)**

The recommended solution is to divide the remaining (vacant and larger) part of the site in two. The section closest to Waitrose could be allocated for housing and the part furthest (i.e. to the south-east) remain as a non-retail business site in the hope of some appropriate businesses of the declared classes showing interest at some point in the future.

It is estimated that, at mid-density, the half allocated for housing could accommodate about 70 housing units. Crucially, that might help to block further retail incursion to the site.

It is proposed that trees be planted between the housing area and Waitrose, and at the south-eastern edge of the section of the site that would remain designated for Class 4, Class 7 and *sui generis* car show room businesses. Those trees should act as screening, and also provide a defensible boundary for the town.

**Scottish Natural Heritage (01587)**

Satisfactory conclusion of HRA of this plan.

**Summary of responses (including reasons) by planning authority:**

**Helensburgh Green Belt Group (00167)**  
**Helensburgh Community Council (00135)**  
**Helensburgh Study Group (00166)**

**Overview**

Planning permission for the erection of a supermarket on this Business and Industrial Allocation was recommended for refusal by officers (see production xxxx). However, in line with substantial support from the community, Members decided to approve the application, in doing so they recognised the likely effects which the supermarket use might have both on the town centre and on the deliverability of the remaining business and industrial allocation. In recognition of this a package of significant planning gain was negotiated with the developers and operators of the supermarket. This includes a sum of £150,000 to provide a new junction and access to serve the remainder of the business and industrial allocation. The availability of part serviced industrial land should therefore help make it more attractive to potential occupiers.

In terms of business and industrial land supply the need for this land was confirmed by studies which were carried out by Scottish Enterprise, and this level of need was accepted by the Reporters concerned with the Public Local Inquiry with regard to the current Local Plan. In accordance with SPP paragraph 46 the business and industrial site is considered to be marketable and provides part of an effective 10 year supply of business and industry land for the Helensburgh and Lomond area. Crucially, the Objectors have not supplied the Council with an alternative site suitable for industry and business uses if this site was to be re-zoned for another purpose.

As yet there is no evidence to demonstrate that the allocation is no longer appropriate, effective or marketable. However, this will be kept under bi-annual review (Through the Action Programme) and subsequent LDPs may consider appropriate alternative uses should it be demonstrated that the site does not meet market requirements during the next five years.

In terms of Local Development Plan Policy the designated use of this site is as business and industry, and not for retail. The retail policies of the LDP seek to promote a town centre first approach in line with SPP. Only in the exceptional circumstances as set out in paras 62 to 65 of the SPP would retail use of the site be justified.

**Helensburgh Green Belt Group (00167)**  
**Helensburgh Study Group (00166)**

The proposal to re allocate part of this site for housing would not be appropriate given the need to provide an effective 10 year supply of business and industry land; the close proximity of the adjacent supermarket servicing area or potential compatibility issues with additional business and industrial uses, that would have the potential to result in lower standards of amenity, or result in business practices being restricted due to hours of operation being conditioned. In addition, the Council can see no added benefit in zoning this site for housing in terms of deterring retail for being sited in this location.

As has been demonstrated in the Housing Land Audit (see core document xxxx) the proposed housing allocations make provision for an appropriate level of housing to meet the requirements of the Helensburgh and Lomond housing market area. There is no need for further allocations, and the objectors have not adequately demonstrated why this area should be preferred for housing over the allocations identified in the proposed Local Development Plan.

**Helensburgh Study Group (00166) - BI-AL 3/1**

The development of the business and industrial allocation in this area was intended to promote a high quality office and business campus type of development with a range of complimentary uses which required a high quality location (such as car showrooms). The development brief (see production xxxx) which accompanies this proposed allocation has always envisaged landscaping between both the existing housing and also along the south eastern boundary of the site. The purpose of the landscaping along the south eastern boundary of the site being to provide screening of the proposed development from the south east and to create a strong greenbelt boundary which builds upon the enclosure provided by the woodland belt on the north eastern side of the road.

**Scottish Natural Heritage (01587) - BI-AL 3/1**

The Council undertook a Habitats Regulations Appraisal (HRA) of the current Local plan that had this site included with no unacceptable adverse impacts identified. That said the Council is undertaking a HRA for the proposed LDP to address the issue raised by SNH.

**Conclusions**

In view of all the above the Council recommends that no modification to the proposed LDP be undertaken as a result of these objections made to the proposed LDP.

**Reporter's conclusions:**

**Reporter's recommendations:**



<b>ISS104</b>	Green Belt: Helensburgh and Lomond	
<b>Development plan reference:</b>	D413 - Green Belt, General S106 - Rhu/Shandon, Greenbelt S104 - Blackhill, Helensburgh Greenbelt S105 - Blackhill Mire, Helensburgh	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Helensburgh Community Woodlands Group (01766)  Helensburgh Green Belt Group (00167)  Helensburgh Study Group (00166)  Helensburgh Community Council (00135)  Mr Brian Cook (00701)  Ms Jean Cook (01966)  Mr James Duncan (01978)  Ms Linda Duncan (01979)  Mr James S Johnstone (02009)  Mr And Mrs S C And S J Milton (02045)  Ms Pat Pollok-Morris (00276)  Rhu and Shandon Community Council (01260)  Mr David B Price (02063)  Ms Fiona Baker (01895)  Mr Jack Rudram (02117)  Mr and Mrs David and Janice Cowan (00287)</p>		
<b>Provision of the development plan to which the issue relates:</b>		
<b>Planning authority's summary of the representation(s):</b>		
<p><b>S104 - Helensburgh Green Belt Group (00167)</b>  Before the creation of the small industry site at the top of Sinclair Street (subsequently the Argyll and Bute Council Depot) the Green Belt included the full length of the Blackhill Plantation north of Crawford Drive and Abercromby Crescent and the Blackhill Mire beyond it. When the industry site was taken out of the Green Belt a small section of the Blackhill Plantation immediately adjacent to the site was inexplicably also taken out of the Green Belt and included as settlement. During the process of the current local plan the Reporters agreed with HGBG representations that the small area should be redesignated as Green Belt but again for some inexplicable reason this recommendation was not taken up. We therefore object to this small area being designated as settlement and seek its designation as Green Belt.</p> <p><b>S106 - Rhu and Shandon Community Council (01260), S106 – Mr Jack Rudram (02117), S106 - Mr James Duncan (01978) S106 and D413 - Helensburgh Community Council (00135), S106 - Ms Pat Pollok-Morris (00276), S106 - Ms Linda Duncan (01979), S106 - Ms Jean Cook (01966), S106 and D413 - Helensburgh Green Belt Group (00167), S106 and D413 - Ms Fiona Baker (01895), D413 - Helensburgh Study Group (00166)</b></p>		

The Green Belt should remain as in the current Local Plan and not shrunk as indicated in the Proposed Local Development Plan. In addition the area lying between the current green belt boundary and the National Park boundary should be included in an enlarged green belt. The main reasons given are:

1. Greenbelt is felt to be a more protective zone than Countryside. Whilst not under immediate pressure of development from, eg; urban sprawl or expansion, these areas do nevertheless form a protective rural zone around the settlements which should be maintained.
2. The arguments put forward in the Ironside-Farrar Report are considered weak and appear to be based on a starting presumption that less Green Belt is a good thing or that Countryside provides better protection.
3. Green Belt is understood to be a statutory concept and widely recognised (see for example Scottish Planning Policy Feb 2010, ISN17411203, para 159-164), whereas Countryside appears to be a zone defined by Argyll & Bute Council. In this regard Green Belt would appear to have a stronger and more supportive provenance.
4. Looking at the definitions within the Glossary of the Written Statement (pages 82 & 84) Green Belt is seen to be more protective in many ways against inappropriate developments than Countryside. This is confirmed in proposed policy LDP DM1 (G) which refers to control of development in the Green Belt, when compared with LDP DM1 (E) which refers to control of development in the Countryside zone.
5. Paragraph 159 of Scottish Planning Policy Feb 2010 refers to the purposes of Green Belt one of which is to protect and enhance the quality, character, landscape setting and identity of towns etc and another is to protect and give access to open space around towns and villages. The area also contains footpaths, including the new 50 km. "Three Lochs Way", and other access routes of local importance which relate to the third purpose of Green Belts given in SPP Paragraph 159: "access to open space within and around towns". It also has green tourism importance.
6. Extending the Green Belt zone would provide enhanced protection for Helensburgh and Rhu by including Tom na h'Airidh which, to quote Ironside Farrar page 16, "...forms the broader setting to the town (of Helensburgh) and a backdrop of open moorland and forestry." In the case of Rhu, Ironside Farrar on page 18 refers to "...the dark conifer plantations of Highlandman's Wood and the flanks of Tom na h-Airidh give it its wider landscape setting."
7. Thus Ironside Farrar themselves, who have suggested downgrading Highlandman's Wood (area B and C) from Green Belt to Countryside appear confused as to the role these areas play in landscape setting. The fact that it is currently a pine forest (as referred to by Ironside-Farrar) is irrelevant as these can be cropped leaving open hillside possibly vulnerable if zoned as Countryside. The objectors also believe Green Belt provides a better level of protection against, for example, development such as wind farms.
8. The proposed reduction would mean that the protection to the setting of Rhu and Shandon would be reduced to a narrow strip of Green Belt to the west of the West Highland Railway which would do little to provide and protect the overall setting and character of the villages. In addition the inner boundary is not as strong in places as it might be, eg; by St Andrews School, and hence is vulnerable to development pressures. Retention of the area to the north and east of the railway provides a broad distinctive and defensible Green Belt setting, whose existing boundaries are considered to provide a clear and unequivocal

boundary to the Greenbelt, as suggested by paragraph 162 of Scottish Planning Policy Feb 2010.

9. Highlandman's Wood, and adjacent areas, are contained in a Local Nature Conservation Site. It would appear logical that the Green Belt zoning should apply to the whole of this LNCS which stretches from around Aldownick Glen in the west to the National Park boundary in the north, and the east edge of Highlandman's Wood.

**S106 - Mr Brian Cook (00701)**

Expresses concern about the downgrading of green belt to Countryside. Greenbelt provides better protection than Countryside and I don't want to see more developments in the area inland from our property. We have noticed a considerable rise in the water table over recent years due, we think, to the failure to keep culverts free from debris. Any development on what is currently green belt would exacerbate the flooding problems we currently experience through increased run off. Highlandman's Wood, is a valued recreational area and should be maintained as greenbelt for this reason. It is, also a Local Nature Conservation Site.

**S106 - Mr James S Johnstone (02009)**

I wish to express concern over the effect this change will have on residents at Stuckenduff (of which I am one). Vehicle access is by unadopted public road which is currently in poor state of repair due to its regular use by heavy commercial vehicles. In order to maintain normal car access to my home I have to repair the damage caused by these commercial vehicles at my own expense. My concern is that the increased commercial activity resulting from this change will render the road impassable to ordinary cars hence removing access for residents, visitors, healthcare professionals, etc.

**D413 – Mr and Mrs David and Janice Cowan (00287)**

The objectors contend that there is no guidance or commitment within the plan on the means by which the authority will consult directly with the involved local residents on matters such as the change of use of Greenbelt land to that for development purposes.

**D413 - Helensburgh Community Woodlands Group (01766)**

The Objector contends that the definition of Greenbelt could be sharper/clearer/more meaningful.

**D413 - Mr David B Price (02063)**

The Objector contends that the former policies area around Camis Eskan House to the South and East are treated as a "NO MAN'S LAND". Limited sympathetic rural based use on the edge of the Green Belt should be allowed.

**Modifications sought by those submitting representations:**

**S104 - Helensburgh Green Belt Group (00167)**

The small section of the Blackhill Plantation adjacent to the Argyll & Bute Council Depot at the top of Sinclair Street, Helensburgh currently shown as settlement is designated as Green Belt.

**D413 - Helensburgh Green Belt Group (00167)**

The Objector requests that the Green Belt, Local Nature Conservation Site (LNCS) and Open Space Protection Area designations from the town boundaries of Helensburgh and Rhu up to the boundary of the National Park, starting in the west at the Aldownick Glen (which is currently LNCS) to the A818 road from Helensburgh to Loch Lomond Park Boundary in the east be extended.

The Objector further requests that the north area of Highlandman's Wood (marked HWOI by

the Ironside Farrar, Green Belt Landscape Study) should be retained as Green Belt as part of the above rationalisation of the Green Belt and not downgraded to Countryside Around Settlement (CAS).

**D413 - Helensburgh Study Group (00166), D413 - Helensburgh Community Council (00135)**

The Objector requests that the Greenbelt and Local Nature Conservation Site status be extended to the land north of Rhu and Helensburgh up to the boundary of the National Park, from Aldownick Glen in the west to the main road from Helensburgh to Loch Lomond in the east.

**D413 - Ms Fiona Baker (01895)**

The Objector requests that the greenbelt is retained as is. No development on greenbelt. No re-zoning as countryside, retain as greenbelt.

**S106 - Helensburgh Community Council (00135)**

None stated.

**S106 - Helensburgh Green Belt Group (00167) S106 - Ms Linda Duncan (01979), S106 - Mr James S Johnstone (02009), S106 - Ms Pat Pollok-Morris (00276), S106 - Mr Brian Cook (00701), S106 - Ms Fiona Baker (01895), S106 - Mr James Duncan (01978)**

These areas should retain the classification of Greenbelt.

**S106 - Rhu and Shandon Community Council (01260), S106 - Mr Jack Rudram (02117)**

The proposal to downgrade the two areas from Green Belt to Countryside should be reversed and both retained as Green Belt. The broader area stretching from west of Aldownick Glen (including the totality of the Local Nature Conservation Site) towards the A818 in the east, and from the outer Green Belt boundary of Rhu and Helensburgh in the south, up to the National Park Boundary in the north should be re-zoned in its entirety from Countryside to Green Belt.

**D413 - Mr and Mrs David and Janice Cowan (00287)**

A clear commitment statement within the final Local Development Plan.

**D413 - Helensburgh Community Woodlands Group (01766)**

The Objector requests that all wording after "Shandon" should be deleted and replaced with "The greenbelt designation of these named areas will: - direct planned growth to the most appropriate locations and support regeneration of the settlements, - protect and enhance the quality, character, landscape setting and identity of the settlements and - protect and give access to open space within and around the settlements. The cumulative erosion of a green belt's integrity through the granting of individual planning permissions will be avoided. The green belts can provide a range of opportunities for outdoor recreation, education and tourism in addition to protecting and enhancing biodiversity, the landscape and the historic environment."

**D413 - Mr David B Price (02063)**

The Objector requests that limited sympathetic rural based use on the edge of the Green Belt should be allowed.

**Summary of responses (including reasons) by planning authority:**

**S104 - Helensburgh Green Belt Group (00167)**

With regard to the green belt in the vicinity of the Blackhill Depot site, the Council does not agree with the objectors statement “During the process of the current local plan the Reporters agreed with HGBG representations that the small area should be redesignated as Green Belt”. The Reporters recommendation with regard to this issue was “we support the modification to recognise the implemented use of the objection site” (see production xxxx chapter 16.1.19), and this is what is included in the Adopted Local Plan.

**S106 - Rhu and Shandon Community Council (01260), S106 – Mr Jack Rudram (02117), S106 - Mr James Duncan (01978) S106 and D413 - Helensburgh Community Council (00135), S106 - Ms Pat Pollok-Morris (00276), S106 - Ms Linda Duncan (01979), S106 - Ms Jean Cook (01966), S106 and D413 - Helensburgh Green Belt Group (00167), S106 and D413 - Ms Fiona Baker (01895), D413 - Helensburgh Study Group (00166)**

The Council does not agree with the assessment made by the Objectors in terms of Green Belt boundaries as defined in the Proposed Local Development Plan. These have been informed by the Argyll and Bute Green Belt Landscape Capacity Study (Core Doc. Ref. xxxx) commissioned by ABC Council from landscape architects Ironside Farrar in 2010. This study has been selectively referred to by a number of the Objectors, none of whom have submitted any other form of landscape analysis from qualified landscape architects to counter the content of the commissioned study. The study was commissioned as a result of a commitment made by the Council during the public local inquiry for the Argyll and Bute Local Plan, in response to objections raised in relation to a number of green belt issues. When commissioning the study the consultants were required to have regard to the key objectives of green belt policy as set out in Scottish Planning Policy ( Core Document ref xxxx para 159). To:

- direct planned growth to the most appropriate locations and support regeneration,
- protect and enhance the quality, character, landscape setting and identity of towns and cities, and
- protect and give access to open space within and around towns and cities.

In addition the commission for the study specifically asked that consideration be given to:

- Should the outer boundary of the green belt be extended eastwards to the boundary with the National Park, or does the current boundary appropriately reflect topography and landscape?
- The Landscape Assessment should evaluate the contribution the identified green belt makes to the character, landscape setting and identity of the settlements of Helensburgh, Cardross, Rhu and Shandon. The Landscape Assessment should identify any areas of the green belt which do not contribute to the character, landscape setting and identity of these settlements or if necessary identify any additional areas which may be required to secure these objectives.
- The green belt boundary should be capable of being identified on site with regard to obvious landscape features, the landscape assessment should assess the appropriateness of the current boundaries and if necessary recommend alterations to the boundary where stronger boundary features are required.

The green belt landscape capacity study adopts a clear and consistent methodology to assess the study area, involving its subdivision in to smaller areas relating to the landscape character, topography and setting of settlements within the green belt. Detailed assessments are provided for each of these areas together with an assessment of the contribution which they make to green belt landscape objectives of SPP as well as recommended changes are summarised in table 6.1 of the Landscape Capacity Study (core document ref xxxx).

The Landscape Capacity Study determined that the majority of the green belt is of a high landscape value. In particular the main areas of the green belt between the border with West Dunbartonshire and Rhu meet the principal SPP objectives by providing a setting for the principal settlements, preventing coalescence and providing, to various degrees, a gateway to these settlements. In some cases the study made recommendations for changes or improvement to the green belt boundary. Those recommendations for changes which have been taken forward in the Proposed Local Development Plan include those which address the SPP objectives in the following ways:

- Protecting the approach to Helensburgh from the Loch Lomond and the Trossachs National Park and the setting of Helensburgh when viewed from across the Gare Loch by incorporating new areas between the A818 and the National Park Boundary.
- Improving the consistency and robustness of the green belt by rationalising its coverage to areas in which it can clearly meet core SPP development control objectives. In all cases these areas have been reassigned to other protective landscape designations more suited to their character and location. This has included
  - exclusion of hilltop areas above Helensburgh that are of clear upland character (moorland or forestry), that are relatively remote from the settlements and unlikely to be developed, and re-designation as Very Sensitive Countryside or Countryside;
  - exclusion of steeply sloped areas north of the West Highland railway line above Shandon and re-designation as Sensitive Countryside.

While the landscape study had also recommended changes to the inner boundary particularly where these related to areas which had been developed for formal sports and recreation purposes these are retained in the green belt as proposed in the Local Development Plan, together with their designation as Open Space Protection Areas as appropriate. Those changes which have been made to the inner boundary of the green belt have been limited to those areas which have been identified to meet the need for additional housing land release in order to accommodate the housing requirements identified in the Housing Need and Demand Assessment as approved by the Scottish Government's Centre for Housing Market Analysis. The selection of which has been informed by the green belt landscape study.

**S106 - Mr Brian Cook (00701)**

**S106 - Mr James S Johnstone (02009)**

Where the Proposed Local Development Plan has removed areas from the outer edges of the green belt in accord with the recommendations of the landscape study these have been placed in either Countryside or Very Sensitive Countryside designations. In terms of the plans settlement strategy these areas do not have a general capacity to accommodate development, with development in sensitive countryside being limited to small scale infill rounding off and redevelopment in locations not adjacent to defined settlement boundaries. Within Very Sensitive Countryside development opportunities are even more limited to, essentially those with a locational or operational need. It is therefore not envisaged that such redesignation would give rise to the flooding and traffic problems anticipated by the objectors.

**D413 – Mr and Mrs David and Janice Cowan (00287)**

Outwith the Strategic Development Plan areas, the Local Development Plan is the established mechanism for review of Green belt boundaries. The Local Development Plan process, contains statutory requirements for public consultation, and includes a requirement for the annual publication of a Development Plan Scheme which sets out the program for plan preparation and identifies the opportunities which the public have to engage in the plan preparation process.

**D413 - Helensburgh Community Woodlands Group (01766)**

This objection relates to the definition of green belt given in the glossary to the LDP. The glossary is not the appropriate place to reiterate green belt policy. Policy LDP DM 1(G) sets out policy for greenbelt and adopts an approach which is consistent with Scottish Planning Policy para 163 (see core document **xxxx**).

**D413 - Mr David B Price (02063)**

There have been no changes made to the boundary of the green belt to the south and east of Camis Eskan House. The policies on applicable green belt uses are those which have been long established and are reflected in Scottish Planning Policy. This allows appropriate rural uses.

**Conclusions**

In view of all the above the Council recommends that no modification to the proposed LDP be undertaken as a result of these objections made to the proposed LDP.

**Reporter's conclusions:**

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**Reporter's recommendations:**

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<b>ISS105</b>	<b>Housing Allocation: Ardencaple</b>	
<b>Development plan reference:</b>	H-AL 3/12 - Helensburgh - Ardencaple	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p><b>Ms Linda O'Connor (01697);</b>  <b>Mr Melvyn C Hornsby (01756);</b>  <b>Mr J T P Brownrigg (01778);</b>  <b>Helensburgh Green Belt Group (00167);</b>  <b>Friends of Duchess Wood (00821);</b>  <b>Ms Elaine Kordys (01893);</b>  <b>Boo Bennett (01916);</b>  <b>Luss Estates Company Graham Elliott (00662);</b>  <b>Ms Pat Pollok-Morris (00276);</b>  <b>Ms Margaret Morrison (02048);</b>  <b>Mr And Mrs Andrew And Catherine Gemmell (01783);</b>  <b>Ms Fiona Baker (01895);</b>  <b>Mr And Mrs Ian And Cathie Grout (01857);</b>  <b>Mr And Mrs David And Rachel Bailey (02121):</b></p>		
<b>Provision of the development plan to which the issue relates:</b>		
<b>Planning authority's summary of the representation(s):</b>		
<p><b>Ms Linda O'Connor (01697) - H-AL 3/12</b></p> <p>Objects to the proposed housing development - Firstly the plans appear to encroach upon my land which extends to the top of the old Dobbies fence. Secondly, my family have lived in a lovely rural setting for 40 years. We always understood that the land behind was green belt and suddenly we are to be surrounded by a housing estate.</p> <p><b>Mr Melvyn C Hornsby (01756) - H-AL 3/12</b>  <b>Mr J T P Brownrigg (01778) - H-AL 3/12</b>  <b>Ms Elaine Kordys (01893) - H-AL 3/12</b>  <b>Mr And Mrs Andrew And Catherine Gemmell (01783) - H-AL 3/12</b>  <b>Mr And Mrs Ian And Cathie Grout (01857) - H-AL 3/12</b>  <b>Mr And Mrs David And Rachel Bailey (02121) - H-AL 3/12</b></p> <p>The community was not consulted on the inclusion of the Ardencaple Extension in the Local Development Plan. The land within the Ardencaple extension other than the garden centre was to be retained as Green Belt land and hence Ardencaple extension was not included in the Main Issues Report. The land owner or developer led Argyll and Bute Council Planning department to believe that the entire site had previously been used as hard standing and therefore the site was compromised. This is untrue. The area to the north of the garden centre, which is Green Belt land, consists of large stands of mature willow and birch as well as regenerating woodland and was not used by the former garden centre.</p> <p>The proposed extension contravenes previously specified low density housing on the Ardencaple garden centre. The Adopted Local Plan (2009) specified that the Ardencaple</p>		



Garden Centre site could have “no more than 16 units” on the site in line with the Reporters recommendations. Assuming that only 16 houses would be built on the Ardencaple Garden Centre (as per the Adopted Local Plan, 2009), this would mean that the remaining 44 houses of the total of 60 is proposed for the <2 hectare Ardencaple Extension, and hence for the Green Belt land. In our opinion, this contravenes the low housing density specified by the Reporters to the Public Inquiry into the last Local Plan.

Ardencaple Extension Disregards Paragraph 159 of the Scottish Planning Policy for Green Belts (February 2010). The proposed development does not respect the open, semi-rural character of the area, and the very low density of the housing currently within the vicinity.

The Strategic Environmental Assessment for this site suggests that ‘The development provides opportunity to secure more formal links between it and adjacent recreational areas’. In our opinion, we think that this assessment contravenes the objectives of the Scottish Planning Policy for Green Belts. The proposed development, particularly on the current Green Belt land within the proposed site, would preclude access to green space within walking distance from existing local settlements, especially as the apparent high density of the proposed housing would allow little scope for public footpaths through the development. The woodland is regularly used by the local community for access to the adjacent Local Nature Reserve (Duchess Wood) and also as an area for informal recreation in its own right. The LNR, is heavily used by the local community, thus providing support for the proposed Ardencaple Extension to remain as open, green space for local community use. Better still would be for it to be managed as an extension to Duchess Wood LNR.

Except for the Garden Centre, the area outlined is indeed Green Belt and it affords distinction between Rhu and Helensburgh. As we have mentioned, it also provides access to the local community to open, green space within walking distance from local settlements for all ages. The area also provides an important wildlife corridor to and from Duchess Wood and surrounding areas. The woodland on the northern half of Ardencaple extension would provide a suitably wide and defensible boundary between the current allocation, and further Green Belt land to the north. It is hard to see that a single row of elderly poplar trees could fulfill such a clear purpose.

The proposed site includes a pond inhabited by amphibians and a woodland community interestingly different from that found in Duchess Wood. The area is notable for banks of moss and many orchids and other flowering plants. As a result this site forms a valuable habitat type and likely greatly adds to the biodiversity of the area.

The proposed site and Glenoran Road are often running in water after heavy rain, and Rhu Road Higher has flooded regularly over the winter of 2012/2013. A large pressure is already put on the drains and burn to the west of Glenoran Road from the volume of water that comes off the hills and the field to the north of the site. In our opinion, removing and building on a woodland site that would otherwise hold this water will substantially add to this pressure.

Access from Rhu Road Higher would be dangerous, a development of 60 houses would bring with it at a minimum 60 cars and road users. The junction has a dangerous blind spot and the road is narrow with a wall on its northern side. Pedestrian crossing at this point is also hazardous.

A discrepancy exists between the Main Issues Report and the LDP for the number of houses required in the Helensburgh and Lomond area. Argyll and Bute council stated that a total of 743 houses would be their preferred option based on detailed analysis to be built up to 2023 in Helensburgh and Lomond. However, the LDP proposes to allow the building of 1200 houses in the 10 year period in the same area. Why does the Council suddenly feel the need to propose to the building of nearly double the number of houses, especially given the uncertainty surrounding the Faslane Naval base in Garelochhead.

**Helensburgh Green Belt Group (00167) - H-AL 3/12**

The Helensburgh Green Belt Group (HGBG) objected to the allocation of 60 houses at Ardencaple in response to the Main Issues report. In part this was because it was a 'late' bid; in part because the HGBG needed to assess all incursions into the Green Belt to assess where most allocations should be withdrawn; and in part because of an inadequate boundary which we considered was not "defensible".

HGBG remains critical of the assertion that the original planning permission of 16 houses was uneconomical. That is clearly not the case since smaller estates are economical and the original planning application would not have been submitted if it had not been assessed as such.

**Friends of Duchess Wood (00821) - H-AL 3/12**

The Friends of Duchess Wood (FODW) is concerned that any development on this site should protect and enhance the boundary with Duchess Wood to the east. If any development is approved, no damage should be done to Duchess Wood, and a suitable transition zone provided within the site. We are also concerned about the proposals for the northern part of the site, where informal woodland forms a natural extension of Duchess Wood, and where, for example, there are significant clumps of orchids which are not found in Duchess Wood. We are also concerned at the failure to provide a defensible boundary to the site. The narrow line of trees proposed as a boundary is insufficient. For ecological reasons, existing woodland habitat should be enhanced to provide greater continuity of habitat between Glenoran Wood and Duchess Wood by retaining the existing woodland and extending it to the field between the proposed site and the railway line.

**Ms Boo Bennett (01916) - H-AL 3/12**

This 60 home incursion into Green Belt land is excessive and unnecessary.

Most residents seem to agree that sustaining the good amount of green land that lies within the borough is vital to the quality of life in Helensburgh.

This development is not going to do anything towards the much needed regeneration of Helensburgh town centre.

This plan seems to have more to do with politics and increasing the Councils share of government funding than any real need for this housing on Green Belt land, particularly when the future of Faslane and associated employment are unknown.

The recent Waitrose decision surely opens the door for more town centre housing, which would help to regeneration.

**Ms Pat Pollok-Morris (00276) - H-AL 3/12**

Objection to increase in proposed housing units from 16 to 60

**Ms Margaret Morrison (02048) - H-AL 3/12**

Access from this site onto a blind corner at Glenoran Road would be very dangerous.

**Ms Fiona Baker (01895) - H-AL 3/12**

Proposed building of 60 houses on greenbelt behind old Dobbies – we lost Dobbies as they could not expand.

In general Helensburgh has no shortage of housing stock – the Helensburgh Advertiser

reports 230 houses on the market at present, the Hermitage Academy site is yet to be developed for housing and there are other smaller more suitable sites.

### **Luss Estates Company Graham Elliott (00662) - H-AL 3/12**

We write on behalf of the landowners of the proposed Ardencaple Housing Allocation (H-AL 3/12), on Rhu Road Higher at Helensburgh. We are broadly in support of the proposed allocation. We support the indicative capacity of 60 housing units on the site and recognise the requirement for 25% affordable housing provision. We do however request a minor amendment to the proposals map which accompanies the Proposed Plan. This currently identifies the site as being within a "Strategic Masterplan Area", however no specific requirement for masterplanning has been identified for the site in the written text of the plan. In addition to the above points we would like to take this opportunity to provide some brief further supporting commentary for the allocation of the land at Ardencaple for housing:

#### Deliverability

The land at Ardencaple is covered by two ownerships, both landowners are in full cooperation and are fully committed to facilitating the delivery of housing on the site within the operational period of the forthcoming Argyll and Bute Local Development Plan. The increase in the numbers of housing which can be delivered as a result of the extended allocation, means that the site is viable for delivery.

#### Affordable Housing

Support expressed for the requirement for a contribution to the affordable housing stock in Helensburgh as part of this allocation. Once the comfort of a secured allocation allows us to proceed with detailed proposals, discussions will be undertaken with Argyll and Bute Council and the relevant bodies to determine the best way to contribute.

#### Site Conditions

The site is bounded to the west by the Glenoran Road. It is intended that access to the site will be taken from this road, which will require the upgrading of part of the road to adoptable standard. This will bring about an improvement to the current condition of the road which currently suffers from poor drainage. The upgrading of Glenoran road to the point of access on to the site will also facilitate the installation of improved drainage infrastructure.

Initial discussions have been held with the Argyll and Bute Council Roads Department. A Sustainable Urban Drainage System scheme will be utilised as part of the development to ensure no surface run off from the site.

The site is bounded to the north by land of agricultural character which currently forms part of the Green Belt. The mature tree line which forms this boundary already provides a natural boundary to the settlement. We recognise the requirement for a landscaping strategy to be prepared as part of a future application to ensure that the defensible boundary to the north is maintained and reinforced.

The Luss Estates Company works closely with the Helensburgh Green Belt Group and the Friends of Duchess Wood, which is owned by the Estate. Liaison with these groups will continue as the site progresses, including the potential provision of a nature corridor north of Ardencaple linking Duchess Wood with woodland in the west.

To conclude, we are in support of the identified allocation at Ardencaple and the indicative capacity of 60 units with 25% affordable housing. We request that the Strategic Masterplan

Area allocation is removed from the site.

**Modifications sought by those submitting representations:**

**Ms Linda O'Connor (01697) - H-AL 3/12**  
**Mr Melvyn C Hornsby (01756) - H-AL 3/12**  
**Mr J T P Brownrigg (01778) - H-AL 3/12**  
**Ms Elaine Kordys (01893) - H-AL 3/12**  
**Mr And Mrs Andrew And Catherine Gemmell (01783) - H-AL 3/12**  
**Mr And Mrs Ian And Cathie Grout (01857) - H-AL 3/12**  
**Mr And Mrs David And Rachel Bailey (02121) - H-AL 3/12**  
**Ms Boo Bennett (01916) - H-AL 3/12**  
**Ms Pat Pollok-Morris (00276) - H-AL 3/12**  
**Ms Fiona Baker (01895) - H-AL 3/12**

Revert to original Allocation.

**Ms Margaret Morrison (02048) - H-AL 3/12**

None suggested

**Helensburgh Green Belt Group (00167) - H-AL 3/12**

A defensible town boundary of at least 70 metres deep should be planted in advance of any building work. That woodland should have the following designations: Green Belt, Open Space Protection Area and Local Nature Conservation Site. It should provide a green corridor and wildlife linkage between Glenoran Wood and Duchess Wood.

**Friends of Duchess Wood (00821) - H-AL 3/12**

Protection and enhancement of the woodland habitat as suggested above.

**Luss Estates Company Graham Elliott (00662) - H-AL 3/12**

We support the proposed allocation. The only amendment we seek is that the masterplan designation is removed from the site as explained above.

**Summary of responses (including reasons) by planning authority:**

**Ms Linda O'Connor (01697) - H-AL 3/12**

The boundaries of the site are not intended to encroach on any third party land, the mapping which accompanies the Proposed Local Development Plan is of a scale which shows the general boundaries of the proposed allocation, at this location. Precise boundaries taking account of ownership would be a matter for consideration at the detailed application stage.

Settlements evolve over time, and part of the proposed allocation comprises a former horticultural nursery which then became a more formalised garden centre. This was then, subsequently abandoned, and following the Public Inquiry in to the current Local Plan was identified as an allocation for 16 houses. The rural nature of the area has therefore changed overtime, and further change has already been sanctioned by the Reporters' recommendation that the site be included as an allocation in the Argyll and Bute Local Plan.

**Mr Melvyn C Hornsby (01756) - H-AL 3/12**  
**Mr J T P Brownrigg (01778) - H-AL 3/12**  
**Ms Elaine Kordys (01893) - H-AL 3/12**  
**Mr And Mrs Andrew And Catherine Gemmell (01783) - H-AL 3/12**  
**Mr And Mrs Ian And Cathie Grout (01857) - H-AL 3/12**  
**Mr And Mrs David And Rachel Bailey (02121) - H-AL 3/12**  
**Helensburgh Green Belt Group (00167) - H-AL 3/12**  
**Ms Pat Pollok-Morris (00276) - H-AL 3/12**

As a result of consultation on the Main Issues Report, a number of additional potential sites were identified to the council, as was the need to ensure that sufficient land was available to meet identified housing needs. Accordingly the Council prepared an annex to the Strategic Environmental Assessment, and carried out further public consultation on Proposed Additional Sites. This further consultation follows best practise and further advice from Scottish Government Officials and goes beyond that required by planning legislation.

**Mr Melvyn C Hornsby (01756) - H-AL 3/12**  
**Mr J T P Brownrigg (01778) - H-AL 3/12**  
**Ms Elaine Kordys (01893) - H-AL 3/12**  
**Mr And Mrs Andrew And Catherine Gemmell (01783) - H-AL 3/12**  
**Mr And Mrs Ian And Cathie Grout (01857) - H-AL 3/12**  
**Mr And Mrs David And Rachel Bailey (02121) - H-AL 3/12**

An inspection of the site by Planning Officers revealed that some parts of the site showed evidence of use by the garden centre as hardstanding and storage areas, whilst other parts of the site contained regenerating scrub woodland, and others more established trees. The previous use of the site was not the determining factor in deciding to identify this site as a proposed allocation. A number of additional factors were which taken in to consideration are discussed below:-

The issue of increasing housing densities was outlined in the Main Issues Report, both to promote more efficient use of resources, help reduce carbon emissions, provide greater economies of scale, and promote the provision of more varied house sizes and types, more accurately reflecting needs of smaller households which the Housing Need and Demand Assessment identifies as making up an increasing proportion of need and demand in the area (see core document xxxx para 6.1).

The proposed Allocation H-AL 3/12 extends to 2.7 ha, the proposed density at just over 22 houses per hectare (or 9 per acre) is considered to be medium density. Whilst the Council accepts that this is greater than the low density recommended by the Reporters, this increase in density is considered appropriate in light of the changes to the site, housing need and demand in the Helensburgh and Lomond area, and the declining economic conditions in terms of site delivery since the Adoption of the Argyll and Bute Local Plan. Paragraph 159 of Scottish Planning Policy (see Core Document xxxx) states: "*The purpose of green belt designation in the development plan as part of the settlement strategy for an area is to:*

- *direct planned growth to the most appropriate locations and support regeneration,*
- *protect and enhance the quality, character, landscape setting and identity of towns and cities, and*
- *protect and give access to open space within and around towns and cities.*

*Green belt designation should provide clarity and certainty on where development will and*

*will not take place..... Green belt designation should be used to direct development to suitable locations, not to prevent development from happening.”*

The proposed extension to the Ardencaple Allocation is considered to be consistent with Scottish Planning Policy on Green Belts. Its release has been promoted through the Local Development Plan preparation process, which seeks to direct growth to the most appropriate locations in accordance with the settlement strategy as set out in the Development Plan and also helps to facilitate the redevelopment of the brownfield former garden centre site that forms part of the site. The findings of the Helensburgh and Lomond Green Belt Landscape Capacity Study (core document xxxx) have also been taken into account. The site lies to the east of Glen Oran Road where properties on the western side form the settlement edge and adjoin the sensitive wedge between Helensburgh and Rhu that will be retained within the Green Belt. The northern boundary of the proposed housing allocation has been drawn to exclude a 10 metre wide strip of wood land to allow a sustainable and defensible Green Belt boundary to be firmly established.

The open space audit for Helensburgh and Lomond (core document xxxx), does not reveal a deficit of informal open space in this part of Helensburgh, and although there is some evidence of routes through the site connecting in to the adjacent Duchess Woods LNR, the land owners have confirmed that they are happy to work with the Duchess Woods Management Group to explore ways of improving access to the woods. Supplementary Guidance on Green Networks in Helensburgh is also being prepared and will be consulted on before the adoption of the LDP. The identification of green networks can be used to help secure an access and wildlife corridor for the woodland within this locality.

The site has no nature conservation designations and no evidence has been submitted by the objectors to demonstrate the existence of any protected species.

The proposed development provides the opportunity to upgrade the lower part of Glenoran Road to an adoptable standard, thereby securing drainage improvements and reducing the risk of flooding on Rhu Road Higher as a result. As part of the detailed planning proposals the developers will need to demonstrate that a Sustainable Urban Drainage System scheme will be utilised to ensure no surface run off from the site. The Council's Area Road Engineer is satisfied that a safe junction can be provided at Glen Oran Road/Rhu Road Higher. (see production xxxx).

Following analysis of the responses to the consultation on the Main Issues Report the Council took the decision that where possible it should try to identify allocations and other sites which were capable of meeting the housing needs and demands in the Helensburgh and Lomond Housing Market area.

**Ms Boo Bennett (01916) - H-AL 3/12**

**Ms Fiona Baker (01895) - H-AL 3/12**

The Argyll and Bute Housing Needs and Demands Assessment shows a requirement for 1,200 new homes in Helensburgh and Lomond over a ten year period. The Council has conducted a Housing Land Audit (Core Doc. Ref xxx) which demonstrates that there are not enough development opportunities on existing allocated sites or within infill or other sites within the settlement zone, including Helensburgh Town Centre. In particular, opportunities which the original Pierhead Masterplan identified for a mixed use development with up to 150 residential units, has been replaced with an updated master plan where as a result of public consultation on the proposals the residential development has now been omitted. The potential for more town centre housing is therefore highly limited given the built up nature of the settlement and a lack of sizable sites to accommodate the identified housing needs.

**Ms Margaret Morrison (02048) - H-AL 3/12**

The Council's Area Road Engineer is satisfied that a safe junction can be provided at Glen Oran Road/Rhu Road Higher. (see production xxxx).

**Friends of Duchess Wood (00821) - H-AL 3/12**

The open space audit for Helensburgh and Lomond (core document xxxx), does not reveal a deficit of informal open space in this part of Helensburgh, and although there is some evidence of routes through the site connecting in to the adjacent Duchess Woods LNR, the land owners have confirmed that they are happy to work with the Duchess Woods Management Group to explore ways of improving access to the woods. Supplementary Guidance on Green Networks in Helensburgh is also being prepared and will be consulted on prior to the approval of the LDP, and this can be used to help secure an access and wildlife corridor for the woodland within this locality.

The site has no nature conservation designations, and no evidence has been submitted by the objectors to demonstrate the existence of any protected species.

**Helensburgh Green Belt Group (00167) - H-AL 3/12**

The Helensburgh Green Belt Group have provided no evidence to demonstrate that the site will not have a defensible boundary, and have provided no alternative strategy for accommodating the required amount of land for housing on non Green Belt sites. Similarly they have provided no evidence to back up their assertion that "smaller estates are economical" or that the original application would not have been submitted. There have been significant changes in the housing industry since 2008/2009 and both the Main Issues Report and the Proposed Local Development Plan has sought to recognise this in an effort to secure new housing development.

**Luss Estates Company Graham Elliott (00662) - H-AL 3/12**

The Proposals Maps which accompany the Proposed Local Development Plan show a Strategic Master Plan Area for the Helensburgh Green Belt extending in to H-AL 3/12. The strategic master plan for the Helensburgh Green Belt has been incorporated into the Proposed Local Development Plan and incorporates the findings of the Argyll and Bute Green Belt Landscape Capacity Study (see Core Document xxx). The Council considers that an error has been made here given the requirements for the Masterplan have been superseded by the Proposed LDP and the inclusion of H-AL 3/12. Should the Reporters be so minded the Council would be content to remove the Strategic Master Plan designation covering the Helensburgh Green Belt at this specific location from the Proposals Maps in an effort to improve the accuracy and clarity of the LDP as proposed.

**Conclusion**

The Council considers that the projected decline in total population is a real threat to the viability of the area (including Helensburgh and Lomond) with a potential to adversely impact on the economy/wealth creation, workforce availability and efficient service delivery. The overall objective of the Council's Single Outcome Agreement/Community Plan (SOA) (Core Doc Ref. xxx) that has been approved by the Scottish Government for the 10 years to 2023 is "Argyll and Bute's economic success is built on a growing population." (See page 12 of the SOA). This outcome is in turn entirely supportive of the 6 national policy priorities set out in the national guidance on community planning and will also see Argyll and Bute contribute to the national outcomes for Scotland. The LDP can assist this overall outcome in a number of

ways including providing for a generous supply of land for new housing sites in places where people want to live.

Helensburgh and its neighbouring communities have real potential for growth to assist in meeting the overall objective of the SOA. The lack of available land to allow the building of new housing at a larger scale has been a significant factor in the current population decline and this LDP proposes to tackle this by having sufficient housing allocations to meet our housing needs including affordable and contribute to retaining and growing our population.

The need for housing in the Helensburgh and Lomond area has been established in the Argyll and Bute Housing Need and Demand Assessment which has been approved as robust and credible by the Scottish Governments Centre for Housing Market Analysis (see core document xxxx).

This site H-AL 3/12 can form part of this supply of land as the Council considers the site to be effective and taking into account all of the issues raised by the Objector's can see no reason why this site cannot remain in the plan with no amendments proposed other than the suggested removal of the requirement to undertake a strategic masterplan associated with the Green belt.

**Reporter's conclusions:**

**Reporter's recommendations:**



<b>ISS106</b>	<b>Housing Allocations: Blairvadach</b>	
<b>Development plan reference:</b>	H-AL 3/6 - Shandon - Blairvadach H2006 - Shandon, Blairvadach House	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p> <b>Mrs Patricia Low (01795)</b>  <b>Mr Bryan Wight (01737)</b>  <b>Mr James McLatchie (01741)</b>  <b>Mr Michael L Gladden (01757)</b>  <b>Stuart Gibson (01824)</b>  <b>Mr Jonathon McLatchie (01844)</b>  <b>Mr John Skrastin (01861)</b>  <b>Mr Ian Chatten (01866)</b>  <b>Ms Linda Skrastin (01884)</b>  <b>Mr Brian Aitken (01942)</b>  <b>Mr Brian Cook (00701)</b>  <b>Ms Jean Cook (01966)</b>  <b>Mr James Duncan (01978)</b>  <b>Ms Linda Duncan (01979)</b>  <b>Mr James S Johnstone (02009)</b>  <b>Ms Pat Pollok-Morris (00276)</b>  <b>Mrs M. A. Walker (01305)</b>  <b>Mr Keith Whaley (02097)</b>  <b>Mr David Whitham (02098)</b>  <b>Ms Nicola Skrastin (02111)</b>  <b>Rhu and Shandon Community Council (01260)</b>  <b>Ms Jennifer Skrastin (02110)</b>  <b>Mrs Elizabeth Gladden (01853)</b>  <b>Ms Violet McLatchie (01891)</b>  <b>Ms Fiona Baker (01895)</b>  <b>Mr A Wyllie Robertson (02116)</b>  <b>Mr Jack Rudram (02117)</b> </p>		
<b>Provision of the development plan to which the issue relates:</b>		
<b>Planning authority's summary of the representation(s):</b>		
<p> <b>Mrs Patricia Low (01795)</b>  <b>Mr Bryan Wight (01737)</b>  <b>Mr Michael L Gladden (01757)</b>  <b>Mr John Skrastin (01861)</b>  <b>Mr Ian Chatten (01866)</b>  <b>Ms Linda Skrastin (01884)</b>  <b>Mr Brian Cook (00701)</b>  <b>Ms Linda Duncan (01979)</b>  <b>Mr James S Johnstone (02009)</b>  <b>Ms Pat Pollok-Morris (00276)</b>  <b>Mrs M. A. Walker (01305)</b> </p>		

**Mr David Whitham (02098)**  
**Ms Nicola Skrastin (02111)**  
**Rhu and Shandon Community Council (01260)**  
**Ms Jennifer Skrastin (02110)**  
**Mrs Elizabeth Gladden (01853)**  
**Ms Fiona Baker (01895)**  
**Mr A Wyllie Robertson (02116)**  
**Mr Jack Rudram (02117)**

- 1) Object to the increase in number of units on allocation H-AL 3/6 and the density on proposed allocation H2006.

**Mr Bryan Wight (01737)**  
**Mr Jonathon McLatchie (01844)**  
**Mr John Skrastin (01861)**  
**Mr Ian Chatten (01866)**  
**Ms Linda Skrastin (01884)**  
**Mr Brian Aitken (01942)**  
**Mr James S Johnstone (02009)**  
**Mrs M. A. Walker (01305)**  
**Ms Nicola Skrastin (02111)**  
**Rhu and Shandon Community Council (01260)**  
**Ms Jennifer Skrastin (02110)**  
**Mrs Elizabeth Gladden (01853)**  
**Ms Fiona Baker (01895)**  
**Mr A Wyllie Robertson (02116)**  
**Mr Jack Rudram (02117)**

- 2) The scale of housing proposed is out of character with the surrounding development.

**Mr Bryan Wight (01737)**  
**Mr Michael L Gladden (01757)**  
**Mr John Skrastin (01861)**  
**Ms Linda Skrastin (01884)**  
**Mr Brian Cook (00701)**  
**Mr David Whitham (02098)**  
**Ms Nicola Skrastin (02111)**  
**Rhu and Shandon Community Council (01260)**  
**Ms Jennifer Skrastin (02110)**  
**Mrs Elizabeth Gladden (01853)**  
**Ms Violet McLatchie (01891)**  
**Mr A Wyllie Robertson (02116)**

- 3) Concern over the loss of trees and wildlife as a result of development contrary to Paras 146, 147 and 148 of SPP.

**Mr Bryan Wight (01737)**  
**Mr Ian Chatten (01866)**  
**Mr Brian Cook (00701)**  
**Ms Jean Cook (01966)**  
**Mrs M. A. Walker (01305)**  
**Mr Keith Whaley (02097)**  
**Rhu and Shandon Community Council (01260)**

4) Removal of trees and vegetation will increase runoff and give rise to flooding.

**Mrs Patricia Low (01795)**  
**Mr Bryan Wight (01737)**  
**Mr Ian Chatten (01866)**  
**Mr Brian Cook (00701)**  
**Ms Jean Cook (01966)**  
**Mr James Duncan (01978)**  
**Ms Linda Duncan (01979)**  
**Mr James S Johnstone (02009)**  
**Ms Pat Pollok-Morris (00276)**  
**Mrs M. A. Walker (01305)**  
**Rhu and Shandon Community Council (01260)**  
**Mrs Elizabeth Gladden (01853)**  
**Ms Violet McLatchie (01891)**  
**Mr Jack Rudram (02117)**

5) The proposed development would result in an increase in traffic, with the main road through Rhu village is inadequate to cope with additional traffic.

**Mr James McLatchie (01741)**  
**Mr Michael L Gladden (01757)**  
**Mr John Skrastin (01861)**  
**Ms Linda Skrastin (01884)**  
**Ms Nicola Skrastin (02111)**  
**Ms Jennifer Skrastin (02110)**  
**Mrs Elizabeth Gladden (01853)**  
**Ms Fiona Baker (01895)**  
**Mr A Wyllie Robertson (02116)**

6) The Schedule of land ownership shows that the Council owns the area covered by H-AL 3/6 and H2006. The Council's ownership of this land gives rise to a conflict of interest and as such the Council should followed due process in accord with PAN 82.

**Mr Michael L Gladden (01757)**  
**Rhu and Shandon Community Council (01260)**  
**Mrs Elizabeth Gladden (01853)**

7) Concern at loss of obstacle course and outdoor recreational opportunities which the woodland and openspace currently provide.

**Stuart Gibson (01824)**  
**Mrs Elizabeth Gladden (01853)**

8) Need to ensure development does not compromise neighbouring care facility users.

**Ms Nicola Skrastin (02111)**  
**Ms Jennifer Skrastin (02110)**

9) The proposal is not consistent with Para,78, 79, 80 and 82 of SPP

**Mrs Patricia Low (01795)**  
**Mr Ian Chatten (01866)**  
**Mr Brian Cook (00701)**

**Mr James S Johnstone (02009)**

10) Shandon has no facilities, there are only limited facilities in Rhu. There are limited employment opportunities in Helensburgh. Lack of facilities, poor public transport, and high travel to work costs means that affordable housing risks isolation and deprivation for the elderly, disabled and lower paid.

**Mr Ian Chatten (01866)**

**Mr Brian Aitken (01942)**

**Ms Pat Pollok-Morris (00276)**

**Rhu and Shandon Community Council (01260)**

**Ms Violet McLatchie (01891)**

**Ms Fiona Baker (01895)**

**Mr Jack Rudram (02117)**

11) There is no need for additional housing, the area has a falling and ageing population and over 200 houses for sale locally. There are regeneration opportunities in the Naval Estates in Helensburgh and Rhu which should be taken up before green field sites are developed.

**Ms Linda Skrastin (01884)**

**Mr Brian Aitken (01942)**

12) Planning permission has previously been refused for a house at Broomfield Gardens based on a series of policy contraventions.

**Mrs Patricia Low (01795)**

**Mr Brian Aitken (01942)**

**Mr Brian Cook (00701)**

**Ms Jean Cook (01966)**

**Ms Linda Duncan (01979)**

**Ms Pat Pollok-Morris (00276)**

**Mrs M. A. Walker (01305)**

**Mr Keith Whaley (02097)**

**Mr David Whitham (02098)**

**Rhu and Shandon Community Council (01260)**

**Mrs Elizabeth Gladden (01853)**

**Mr Jack Rudram (02117)**

13) The local school is at capacity and cannot be expanded.

**Mr James Duncan (01978)**

**Rhu and Shandon Community Council (01260)**

14) The Main Issues Report did not include H2006 as a site. Given that A&BC were already marketing the site for housing it should have been highlighted in the MIR. In the absence of earlier consultation the inclusion of H2006 is questioned.

**Rhu and Shandon Community Council (01260)**

**Mrs Elizabeth Gladden (01853)**

15) The proposals will have an adverse effect on the setting of Blairvadach House a

category B listed building

**Modifications sought by those submitting representations:**

**Mrs Patricia Low (01795) - H-AL 3/6 and - H2006**

Not to build any houses - leave the land open and don't destroy the wood.

**Mr Bryan Wight (01737) - H-AL 3/6 and - H2006**

Reduction in the number of houses to reflect the present housing density

**Mr Michael L Gladden (01757) - H-AL 3/6**

**Ms Linda Skrastin (01884) - H-AL 3/6**

Amend Allocation H-AL 3/6 to reduce the housing unit density to match the existing area.

**Mr Michael L Gladden (01757) - H2006**

**Mrs Elizabeth Gladden (01853) - H2006**

**Mr John Skrastin (01861) - H2006**

**Ms Linda Skrastin (01884) - H2006**

**Ms Jennifer Skrastin (02110) - H2006**

Include Blairvadach House and its associated parking lot in H-AL 3/6 and rezone the rest as a protected woodland area.

**Stuart Gibson (01824) - H-AL 3/6 and- H2006**

A statement in the plan indicating that we will be consulted in the design stage.

**Mr Jonathon McLatchie (01844) - H2006 and - H-AL 3/6**

**Ms Violet McLatchie (01891) - H-AL 3/6 and - H2006**

Only small scale development with sensitivity to the countryside and tree population

**Mr John Skrastin (01861) - H-AL 3/6**

**Ms Linda Skrastin (01884) - H-AL 3/6**

**Ms Nicola Skrastin (02111) - H-AL 3/6**

**Ms Jennifer Skrastin (02110) - H-AL 3/6**

Amend allocation H-AL3/6 by reducing housing density so that it is sympathetic and in character with surrounding locale and recent developments. Also ensure that any development on allocation H-AL3/6 does not impinge unnecessarily on any elevation /vista of the listed building. Ensure mature trees are protected.

**Mr Ian Chatten (01866) - H2006 and - H-AL 3/6**

Development proposals for brown field sites in Helensburgh area. Regeneration of underutilised Naval Estates in Helensburgh area. Significant reduction of at least 50% of the housing allocation on the site. Or use of the site for facilities for the benefit of the local population.

**Mr Brian Cook (00701) - H-AL 3/6 and - H2006**

The proposed development must be considerably reduced in scale or, perhaps,

totally abandoned.

**Ms Jean Cook (01966) - H2006 and - H-AL 3/6**  
**Ms Linda Duncan (01979) - H2006 and -H-AL 3/6**  
**Mr Keith Whaley (02097) - H2006 and - H-AL 3/6**  
**Ms Pat Pollok-Morris (00276) - H-AL 3/6**  
**Mr David Whitham (02098) - H-AL 3/6**  
**Rhu and Shandon Community Council (01260) - H-AL 3/6**  
**Mr Jack Rudram (02117) - H-AL 3/6**

Reduce the number of houses back to the number proposed in the 2009 LDP.

**Mr James S Johnstone (02009) - H2006 and - H-AL 3/6**

Reduction in the total number of housing units from 124 to 24

**Ms Pat Pollok-Morris (00276) - H2006**

Amend the allocation to flats in the house only

**Mr David Whitham (02098) - H2006**

Do not develop area H2006

**Rhu and Shandon Community Council (01260) - H2006**  
**Mr Jack Rudram (02117) - H2006**

The allocation for H2006 should be reduced in scale and density to accord with the adjacent areas. This would imply low density housing at an indicative 6 units/ha, or 10 units/ha maximum. Allowing for the nature of the site referred to in point 8 above this would imply not more than 25 units with 25% affordable.

**Mrs Elizabeth Gladden (01853) - H-AL 3/6**

Decrease the density of houses and incorporate Blairvadach house and car park into H –AL 3/6. Minimise the loss of mature trees.

**Ms Fiona Baker (01895) - H-AL 3/6 and - H2006**

Reduce housing allocations at Blairvadach (H-AL3/6 and H2006) to low density – much smaller number of houses.

**Mr A Wyllie Robertson (02116) - H-AL 3/6 and - H2006**

**Mr James McLatchie (01741) - H-AL 3/6 and - H2006**

No modification suggested

**Summary of responses (including reasons) by planning authority:**

**1) Object to the increase in number of units on allocation H-AL 3/6 and the density on proposed allocation H2006.**

The issue of increasing housing densities was outlined in the Main Issues Report, (See Core Doc Ref. xxx) both to promote more efficient use of resources, help reduce carbon emissions, provide greater economies of scale, and promote the provision of more varied house sizes and types, more accurately reflecting needs of smaller

households. The Housing Need and Demand Assessment identifying a continuing decline in the size of households fuelled by the growth of single persons and single parent households, and suggests that future housing development profiles focus on the provision of smaller units. (see core document xxxx para 12.4).

**2) The scale of housing proposed is out of character with the surrounding development; Concern over the loss of trees and wildlife as a result of development contrary to Paras 146, 147 and 148 of SPP.**

The Council considers that the Housing Need and Demand Assessment shows that the majority of both need and demand comes from smaller households. The site presents both the redevelopment of a valued listed building that will become vacant by the summer of 2015 and brownfield opportunities. These opportunities are considered suitable for flatted development and smaller housing units. The Council further considers that provided that these are taken forward with appropriate design and siting the development of this site need not necessarily be out of character with the surrounding area. In relation to the woodland, this has not been identified on the inventory of ancient semi natural woodland, and as such para 146 would not apply. The provisions of paras 147 and 148 would be applicable, were the woodland to be affected. In identifying the area for the proposed allocations, it was not the intention that the woodland to be clear felled, but rather that the woodland edges of the site be retained, incorporated into the open space requirements of the site and managed appropriately. Important individual trees within the site area will also be retained and incorporated within the layout of any development. In addition, the sites have no wildlife designations.

**3) Removal of trees and vegetation will increase runoff and give rise to flooding.**

As part of the proposals for any development the developers will be required, through Supplementary Guidance (SG) associated with the plan, to submit a drainage impact assessment, and include designs for a sustainable urban drainage scheme which will ensure that there will be no increase in run off and consequent risk of flooding as a result of any development. The Council intends to minimise the loss of mature trees by taking full account of SG LDP – Development Impact on Trees/Woodland as part of any development of the sites.

**4) The proposed development would result in an increase in traffic, with the main road through Rhu village is inadequate to cope with additional traffic.**

The Council's area road engineer has raised no concerns in relation to additional traffic with regard to this site. The redevelopment of Blairvadach will only take place once the Council vacates the offices with a consequent reduction of traffic movements from 70 employees. Residential development of the site is likely to result in less peaky flows of traffic and in the context of traffic flows along this main road generally will have minimal affect.

**5) The Schedule of land ownership shows that the Council owns the area covered**

**by H-AL 3/6 and H2006. The Council's ownership of this land gives rise to a conflict of interest and as such the Council should followed due process in accord with PAN 82.**

The Council has declared its interest in the site as part of the procedures associated with the LDP process (Core Doc Ref. xxx) and PAN 82. The objectors have submitted no evidence to the contrary and the Council does not accept that it has any conflict of interest here.

**6) Concern at loss of obstacle course and outdoor recreational opportunities which the woodland and openspace currently provide.**

The land leased by Glasgow City Council for the obstacle course associated with its outdoor centre on the shore side of the road, is located within the riverine woodland which runs alongside the burn on the south eastern boundaries of the allocation H- AL 3/ 6. (See production xxxx). The lower portion of this obstacle course is outwith the proposed allocation boundaries, although the proposed boundaries of the allocation encroach on parts of the upper area. Given the wooded and steeply sloping nature of the area leased for the obstacle course, it is considered that this area would not form part of the developable area of the proposed allocation, but would remain as part of a retained landscape area between the proposed development and the surrounding area. Accordingly if the Reporters were minded the proposals map boundaries for this small area could be adjusted to exclude this area, without material compromise to the purpose or expected capacity of the allocation.

**7) Need to ensure development does not compromise neighbouring care facility users.**

Whilst there is currently a disagreement between the two Councils as to the legal basis for current occupancy of this facility, in land use terms Class 8 – Residential Institutions and Class 9 Houses would be considered compatible. The Council therefore considers that there is no potential conflict regarding the potential co-existence with these two uses.

**8) The proposal is not consistent with Para, 78, 79, 80 and 82 of SPP.**

In identifying the proposed allocations the planning authority has had regard to SPP, all development would be expected to comply with the Councils Sustainable Design Guides, thereby ensuring successful place and quality residential environments, as advocated by Para 78. In terms of Para 79 the site is immediately adjacent to a dedicated cycle route, thereby facilitating active travel, and is also on a frequent bus service route with bus stops adjacent to the entrance to the site. Para 80 of SPP states “ Planning authorities should promote the efficient use of land and buildings, directing development towards sites within existing settlements where possible to make effective use of existing infrastructure and service capacity and to reduce energy consumption. Redevelopment of urban and rural brownfield sites is preferred to development on greenfield sites. The allocations at Blairvadach do exactly that with the proposed re-use of a soon to be vacant (2015) valued listed building and



associated area of brownfield land. Para 82 of SPP refers to infill development, as the sites have been identified as allocations this paragraph is not considered applicable.

- 9) Shandon has no facilities, there are only limited facilities in Rhu. There are limited employment opportunities in Helensburgh. Lack of facilities, poor public transport, and high travel to work costs means that affordable housing risks isolation and deprivation for the elderly, disabled and lower paid.**

Scottish Planning Policy (Paragraph 88 Core Document xxxx) encourages Local Development Plans to seek the integration of affordable housing in all new housing developments wherever such a need has been demonstrated. The benchmark figure being that each site should contribute 25% of the total number of housing units as affordable housing. The need for affordable housing in Helensburgh and Lomond as established in the Housing Need and Demand Assessment is significant. There is therefore an expectation in the LDP that all developments of 8 or more housing units should make provision for affordable housing at a rate of 25%. Such provision will help to overcome the deprivation and promote social integration of those groups of people referred to by the objectors. While it is accepted that there are limited facilities in Shandon its self, there are bus stops with frequent public transport services on the main road immediately adjacent to the site, as is a dedicated cycle route. Blairvadach is situated between Helensburgh (the largest town in Argyll and Bute) and Faslane (the largest single employment site in the west of Scotland) and accordingly opportunities for local employment and consequently travel to work costs are not considered to be disproportionately high, and are likely to be considerably less than more rural parts of Argyll where public transport services are considerably reduced, there are fewer options for active travel, and greater distances to travel to work.

- 10) There is no need for additional housing, the area has a falling and ageing population and over 200 houses for sale locally. There are regeneration opportunities in the Naval Estates in Helensburgh and Rhu which should be taken up before green field sites are developed.**

The Council considers that the projected decline in total population is a real threat to the viability of the area (including Helensburgh and Lomond) with a potential to adversely impact on the economy/wealth creation, workforce availability and efficient service delivery. The overall objective of the Council's Single Outcome Agreement/Community Plan (SOA) (Core Doc Ref. xxx) that has been approved by the Scottish Government for the 10 years to 2023 is "Argyll and Bute's economic success is built on a growing population." (See page 12 of the SOA). This outcome is in turn entirely supportive of the 6 national policy priorities set out in the national guidance on community planning and will also see Argyll and Bute contribute to the national outcomes for Scotland. The LDP can assist this overall outcome in a number of ways including providing for a generous supply of land for new housing sites in places where people want to live.

Helensburgh and its neighbouring communities have real potential for growth to assist

in meeting the overall objective of the SOA. The lack of available land to allow the building of new housing at a larger scale has been a significant factor in the current population decline and this LDP proposes to tackle this by having sufficient housing allocations to meet our housing needs including affordable and contribute to retaining and growing our population.

The need for housing in the Helensburgh and Lomond area has been established in the Argyll and Bute Housing Need and Demand Assessment which has been approved as robust and credible by the Scottish Governments Centre for Housing Market Analysis (see core document xxxx).

The objectors have provided no evidence to demonstrate the availability of Naval Estate housing to help meet the approved Housing Need and Demand Assessment. There is therefore no certainty regarding their availability, particularly as the MoD have advised that their land at Rhu which was formerly identified as a housing allocation is no longer available due to the presence of a gas main that traverses part of the site, and has accordingly been removed from the schedule of allocations for the Proposed LDP (see production xxxx).

**11) Planning permission has previously been refused for a house at Broomfield Gardens based on a series of policy contraventions.**

Planning permission was refused because of the effect that the proposed house at the entrance to Blairvadach would have on views of it and the removal of significant mature trees from its park like grounds when viewed from the public road. (see production xxxx). The proposed allocations are not directly comparable and are considered to be capable of development in a manner which is consistent with both the current Local Plan or Proposed LDP policy and associated SG.

**12) The local school is at capacity and cannot be expanded.**

Rhu primary school is 1.5 miles from Blairvadach. The school roll as at September 2012 was 165 and the capacity 229. The Council therefore considers that there is sufficient capacity at this school, alternatively Garelochhead primary school is 4.5 miles away and has a capacity of 363 and a school role of 100.

**13) The Main Issues Report did not include H2006 as a site. Given that A&BC were already marketing the site for housing it should have been highlighted in the MIR. In the absence of earlier consultation the inclusion of H2006 is questioned.**

The Council was not marketing the site for housing at the time of the Main Issues Report as confirmation on the construction of the new offices at East Clyde Street was finalised at that time making the site non-effective and unable to be included as a possible MIR site. That said, proposed Allocation H2006 has always been included as part of the settlement area at Shandon. The site has in the past been marketed for development which could have included residential development as well as the re use

of the existing offices. Its identification as an Allocation in the Proposed LDP helps to provide greater certainty and has allowed more consultation regarding the proposed uses than is required.

**14) The proposals will have an adverse effect on the setting of Blairvadach House a category B listed building.**

The Objectors have provided no evidence for this assertion. Detailed proposals are not yet known, both planning and listed building consent will be required for any works which affect the character or setting of Blairvadach and these will be subject to all of the relevant Policies and Supplementary Guidance of the proposed LDP to ensure no such adverse effects. With the removal of council offices from Blairvadach in 2015 the Council is seeking to deliver a positive future for Blairvadach through its identification as part of a housing allocation in the plan otherwise the future of this valued listed building could be uncertain.

**Conclusion**

The Council therefore, taking all of the above into account, recommends that H-AL 3/6 and H2006 be both retained in the plan, with no amendments in terms of scale, density or area, to allow both sites to contribute to the identified housing needs of the area.

**Reporter's conclusions:**

**Reporter's recommendations:**

<b>ISS107</b>	Housing Land: Cardross	
<b>Development plan reference:</b>	H2002 - Cardross Kirkton Farm 1 H2001 - Cardross Geilston Farm	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Cardross Community Council (00122); Mr Eric Duncan (00435); Mr Robert Murray (00463); Taylor Wimpey plc (00527); Ms Julie Lang (00696); Mr Jim Gibb (00703); Ms Catherine Court (00765); Bett Homes by Gladedale (00808); Ms Patricia Readman (00937); Mr Kenneth Readman (00938); Mrs J Clements- Jewery (01041); Scottish Natural Heritage (01587); Cardross Tenants and Residents Association (01669); Mr Alan Grey (01670); Miss J Guthrie (01698); Mr W J Major (01711); Mr Archie McIntyre (01715); Mr Stewart Macdonald (01729); Mrs Gillian Macdonald (01730); Ms Mavourneen Watkins (01732); Mr And Mrs A Miller (01759); Mrs J L Clow (01777); Ms Myra Martin (01788); Ms Sabrina Dawson (01790); Ms Joan McMillan (01793); Mrs Marjorie Mackie (01797); Mrs Tahira Nasim (01801); Ms Rachel Mansley (01803); Mr Robert Harvey (01808); Mrs Mairi Harvey (01809); Mr Neil Buchanan (01814); Ms Margaret Duggan (01816); Mr Paul Semple (01817); Mrs Rosemary Wilson (01818); Ms Margaret Sargent (01820); Mr Michael Wilson (01822); Ms Amanda Murray (01836); Mr Edmund English (01839); Mrs Ruth O'Keeffe (01840); Mr Brian Craven (01846); Mr Ed Wardle (01854); Ms Karen A Adam (01858); Mr Ian Williams (01860); Ms Elizabeth Gregory (01863); Ms Avril Williams (01867); Mr Duncan Gregory (01869); Mr Ronald Collins (01872); Mr Colin Clarke (01873); Mr Michael Rostant (01874); Ms Theresa Purdie (01876); Mr Ian Purdie (01877); Mr Ewan Mansley (01879); Ms Nicola Wright (01881); Ms Elizabeth Lawrie (01882); Ms Jennifer Mansley (01883); Ms Eileen Murray (01885); Mrs Sarah Taylor (01886); Ms Kathleen Kerr (01888); Ms Fiona Baker (01895); Ms Deborah Tokeley (01908); Ms Fiona Collins (01917); Mr Richard Auty (01921); Ms Susan Auty (01922); Mr Allan Adam (01937); Ms Jenny Adams (01939); Ms Madeline Badger (01944); Mr Chris Barrett (01947); Ms Joyce Borland (01949); Mr Ian Borland (01950); Mr David Branch (01952); Ms Shona Cairns (01955); Cardross Primary School Association (01960); Mr David Charles (01962); Ms Wendy Clarke (01964); Mrs Nicola Charles (01965); Dr Nicola Craise (01969); Mr Richard Creasey (01972); Ms Isabel Cullen (01974); Ms Sharon Creasey (01975); Professor William F Deans (01976); Ms Rose Creasey (01977); Mr Scott Elliott (01981); Ms Morag Elliott (01983); Ms Sharon Goodwin (01986); Ms Jacqueline Gibbs (01987); Mr William Grant (01989); Mr D V Griffiths (01994); Mr John Hendren (01996); Mr JM Henson (01999); Ms Victoria Hendren (02000); Ms Gwynneth Humphries (02002); Mr And Mrs Hunter (02003); Mr Mark Kemp (02010); Mr Jim Kinloch (02014); Mrs Stella Kinloch (02015); Mrs Flora Leckie (02016); Ms Peiwah Lee (02017); Mr David Lockhart (02019); Mr David MacDonald (02023); Mr David MacDonald (02025); Mr David MacDonald (02025); Ms Dorothy MacDonald (02026); Mr Johan Machtelinckx (02031); Mr Jack McAulay (02032); Ms Caroline McNair (02039); Ms Andrea Miller (02041); Mr Andrew Miller (02042); Mr Mark McDougall (02044); Ms Joanne Moses (02049); Ms Christine Nevin (02050); Ms Eileen Newton (02052); Mr James Paterson (02055); Mr And Mrs P Preston (02060); Ms Rhoda Faye Preston (02061); Mr Craig Rooney (02069); Ms Anne Ryan (02071); Mr Mark Ryan (02072); Ms Linda Scott (02074); Ms Sara Sullivan (02082); Ms Dawn Thom (02085); Mr Ronald Ventilla (02091); Ms Margaret Ward (02092); Mr John Watkins (02093); Mr Archie Westwood (02094); Mr Alan Young (02102); Ms Carol Young (02103); Ms Jill Young (02104); Ms Liane Young (02105); Mr Michael Young (02106); Mr Rikki Young (02107); Mr Ian Thom (02109); Mr And Mrs Sweeney (02112); Ms Isabel S Cullen (02113); Mr John Lewis (02123)</p>		

Provision of the development plan to which the issue relates:

Planning authority's summary of the representation(s):

**Scale/Character of Village/Conservation Area:**

**H2001 and H2002:**

**Cardross Community Council (00122); Mr Eric Duncan (00435); Ms Julie Lang (00696); Mr Jim Gibb (00703); Mr W J Major (01711); Mrs Gillian Macdonald (01730); Ms Joan McMillan (01793); Mr Paul Semple (01817); Ms Amanda Murray (01836); Mr Edmund English (01839); Mrs Ruth O'Keeffe (01840); Mr Brian Craven (01846); Mr Ed Wardle (01854); Ms Karen A Adam (01858); Mr Colin Clarke (01873); Ms Nicola Wright (01881); Ms Eileen Murray (01885); Mrs Sarah Taylor (01886); Ms Fiona Baker (01895); Ms Susan Auty (01922); Mr Allan Adam (01937); Ms Jenny Adams (01939); Ms Madeline Badger (01944); Mr David Branch (01952); Mr David Charles (01962); Ms Wendy Clarke (01964); Ms Isabel Cullen (01974); Mr Scott Elliott (01981); Ms Morag Elliott (01983); Ms Sharon Goodwin (01986); Ms Gwynneth Humphries (02002); Mr David Lockhart (02019); Mr David MacDonald (02023); Ms Dorothy MacDonald (02026); Mr Jack McAulay (02032); Ms Caroline McNair (02039); Mr Mark McDougall (02044); Ms Joanne Moses (02049); Ms Eileen Newton (02052); Mr James Paterson (02055); Mr And Mrs P Preston (02060); Ms Rhoda Faye Preston (02061); Ms Anne Ryan (02071); Mr Mark Ryan (02072); Ms Sara Sullivan (02082); Ms Dawn Thom (02085); Mr Ronald Ventilla (02091); Ms Margaret Ward (02092); Ms Carol Young (02103); Ms Liane Young (02105); Mr Michael Young (02106); Mr Rikki Young (02107); Mr Ian Thom (02109); Ms Isabel S Cullen (02113)**

**H2001 only:**

**Mr Robert Murray (00463); Ms Patricia Readman (00937); Mr Alan Grey (01670); Mrs Marjorie Mackie (01797); Ms Elizabeth Gregory (01863); Mr Ronald Collins (01872); Ms Theresa Purdie (01876); Mr Ian Purdie (01877); Ms Elizabeth Lawrie (01882); Mr John Hendren (01996); Mr David MacDonald (02025); Mr Johan Machtelinckx (02031); Mr And Mrs Sweeney (02112)**

**H2002 only:**

**Ms Mavourneen Watkins (01732); Ms Myra Martin (01788); Ms Sabrina Dawson (01790); Ms Rachel Mansley (01803); Mrs Mairi Harvey (01809); Mr Ian Williams (01860); Mr Duncan Gregory (01869); Mr Ewan Mansley (01879); Ms Jennifer Mansley (01883); Ms Kathleen Kerr (01888); Ms Shona Cairns (01955); Professor William F Deans (01976); Ms Rose Creasey (01977); Ms Christine Nevin (02050); Ms Jill Young (02104)**

**Scale/Density:**

**H2001 only:**

**Ms Amanda Murray (01836); Mr Brian Craven (01846)**

**H2002 only:**

**Mr Ed Wardle (01854)**

**Housing Need:**

**H2001 and H2002:**

**Cardross Community Council (00122); Mr Robert Murray (00463); Mr Jim Gibb (00703); Mrs Gillian Macdonald (01730); Ms Margaret Sargent (01820); Mr David Branch (01952); Ms Christine Nevin (02050); Ms Sara Sullivan (02082); Ms Liane Young (02105)**

**H2001 only:**

**Ms Julie Lang (00696); Ms Patricia Readman (00937); Mr Kenneth Readman (00938); Mr W J Major (01711); Ms Amanda Murray (01836); Ms Eileen Murray (01885); Ms Jenny Adams (01939); Mr D V Griffiths (01994)**

**H2002 only:**

**Mr Archie McIntyre (01715); Mr Stewart Macdonald (01729); Mrs Mairi Harvey (01809); Mr Ed Wardle (01854); Ms Elizabeth Gregory (01863); Mr Rikki Young (02107)**

**Brownfield in Glasgow/Dumbarton:**

**H2001 and H2002:**

**Mrs Nicola Charles (01965); Ms Sara Sullivan (02082); Ms Liane Young (02105)**

**H2001 only:**

**Mr Kenneth Readman (00938)**

**H2002 only:**

**Ms Eileen Murray (01885); Mr David Charles (01962); Mr Jack McAulay (02032); Mr Rikki Young (02107)**

**Green Belt Loss:**

**H2001 and H2002:**

**Cardross Community Council (00122); Mr Eric Duncan (00435); Mr Robert Murray (00463); Ms Julie Lang (00696); Mrs J Clements- Jewery (01041); Mr Stewart Macdonald (01729); Mrs Gillian Macdonald (01730); Ms Amanda Murray (01836); Mr Edmund English (01839); Mrs Ruth O'Keeffe (01840); Mr Colin Clarke (01873); Ms Jennifer Mansley (01883); Ms Eileen Murray (01885); Ms Fiona Baker (01895); Mr Allan Adam (01937); Ms Madeline Badger (01944); Mr David Branch (01952); Cardross Primary School Association (01960); Mr David Charles (01962); Ms Wendy Clarke (01964); Mrs Nicola Charles (01965); Mr Scott Elliott (01981); Ms Morag Elliott (01983); Mr William Grant (01989); Mr And Mrs Hunter (02003); Mr Mark**

**Kemp (02010); Ms Andrea Miller (02041); Mr Mark McDougall (02044); Ms Christine Nevin (02050); Mr And Mrs P Preston (02060); Ms Linda Scott (02074); Ms Dawn Thom (02085); Ms Carol Young (02103); Ms Liane Young (02105); Mr Michael Young (02106); Mr Rikki Young (02107); Ms Isabel S Cullen (02113)**

**H2001 only:**

**Mr Jim Gibb (00703); Ms Patricia Readman (00937); Mr Kenneth Readman (00938); Mr Alan Grey (01670); Ms Sabrina Dawson (01790); Mr Ronald Collins (01872); Ms Nicola Wright (01881); Ms Elizabeth Lawrie (01882); Ms Fiona Collins (01917); Ms Susan Auty (01922); Mr Chris Barrett (01947); Mr D V Griffiths (01994); Mr Jack McAulay (02032)**

**H2002 only:**

**Ms Myra Martin (01788); Ms Joan McMillan (01793); Ms Rachel Mansley (01803); Mrs Mairi Harvey (01809); Mrs Rosemary Wilson (01818); Mr Brian Craven (01846); Mr Ed Wardle (01854); Mr Duncan Gregory (01869); Mr Ewan Mansley (01879); Ms Shona Cairns (01955); Mr Richard Creasey (01972); Ms Sharon Creasey (01975); Ms Rose Creasey (01977); Mr Alan Young (02102)**

**Ribbon Development:**

**H2001 and H2002**

**Ms Dorothy MacDonald (02026)**

**H2001 only:**

**Mr Scott Elliott (01981)**

**Employment Opportunities:**

**H2001 and H2002:**

**Ms Julie Lang (00696); Mr W J Major (01711); Ms Joan McMillan (01793); Mr Brian Craven (01846); Ms Karen A Adam (01858); Ms Eileen Murray (01885); Ms Wendy Clarke (01964); Mr Scott Elliott (01981); Mr And Mrs Hunter (02003); Ms Isabel S Cullen (02113)**

**H2001 only:**

**Cardross Community Council (00122); Mr Eric Duncan (00435); Ms Patricia Readman (00937); Mr Chris Barrett (01947); Mrs Nicola Charles (01965)**

**H2002 only:**

**Mr Jim Gibb (00703); Ms Myra Martin (01788); Mr Robert Harvey (01808); Ms Margaret Duggan (01816); Mr Colin Clarke (01873); Ms Shona Cairns (01955)**

**School Capacity:**

### H2001 and H2002:

**Cardross Community Council (00122); Mr Eric Duncan (00435); Mr Robert Murray (00463); Mr Jim Gibb (00703); Ms Catherine Court (00765); Mr W J Major (01711); Mr Stewart Macdonald (01729); Mrs Gillian Macdonald (01730); Ms Sabrina Dawson (01790); Ms Joan McMillan (01793); Mr Paul Semple (01817); Ms Margaret Sargent (01820); Ms Amanda Murray (01836); Mr Edmund English (01839); Mrs Ruth O'Keeffe (01840); Mr Brian Craven (01846); Mr Ed Wardle (01854); Ms Karen A Adam (01858); Mr Ian Williams (01860); Ms Avril Williams (01867); Mr Michael Rostant (01874); Ms Nicola Wright (01881); Ms Eileen Murray (01885); Mrs Sarah Taylor (01886); Ms Deborah Tokeley (01908); Ms Susan Auty (01922); Mr Allan Adam (01937); Ms Jenny Adams (01939); Ms Joyce Borland (01949); Mr Ian Borland (01950); Mr David Branch (01952); Cardross Primary School Association (01960); Ms Wendy Clarke (01964); Dr Nicola Craise (01969); Ms Isabel Cullen (01974); Mr Scott Elliott (01981); Ms Morag Elliott (01983); Ms Sharon Goodwin (01986); Mr And Mrs Hunter (02003); Mr Jim Kinloch (02014); Mrs Stella Kinloch (02015); Mr David Lockhart (02019); Mr David MacDonald (02023); Mr David MacDonald (02025); Ms Dorothy MacDonald (02026); Mr Johan Machtelinckx (02031); Ms Andrea Miller (02041); Mr Andrew Miller (02042); Mr Mark McDougall (02044); Ms Rhoda Faye Preston (02061); Mr Craig Rooney (02069); Ms Anne Ryan (02071); Mr Mark Ryan (02072); Ms Linda Scott (02074); Ms Dawn Thom (02085); Ms Margaret Ward (02092); Mr Archie Westwood (02094); Ms Carol Young (02103); Ms Jill Young (02104); Mr Michael Young (02106); Mr Rikki Young (02107); Ms Isabel S Cullen (02113); Mr John Lewis (02123)**

### H2001 only:

**Ms Julie Lang (00696); Ms Elizabeth Gregory (01863); Mr Colin Clarke (01873); Ms Theresa Purdie (01876); Mr Ian Purdie (01877); Mr Alan Young (02102); Ms Liane Young (02105)**

### H2002 only:

**Mr Archie McIntyre (01715); Cardross Tenants and Residents Association (01669); Mr Duncan Gregory (01869); Mr James Paterson (02055); Mr Michael Wilson (01822); Mr Robert Harvey (01808); Ms Caroline McNair (02039); Professor William F Deans (01976); Ms Jacqueline Gibbs (01987); Ms Kathleen Kerr (01888); Ms Margaret Duggan (01816); Ms Mavourneen Watkins (01732); Ms Myra Martin (01788); Ms Shona Cairns (01955); Mrs Flora Leckie (02016)**

### Drainage/Flooding H2001 and H2002:

**Cardross Community Council (00122); Mr Eric Duncan (00435); Ms Catherine Court (00765); Cardross Tenants and Residents Association (01669); Mr W J Major (01711); Mr Stewart Macdonald (01729); Mrs Gillian Macdonald (01730); Ms Margaret Sargent (01820); Ms Amanda Murray (01836); Mr Brian Craven (01846); Mr Ed Wardle (01854); Ms Karen A Adam (01858); Mr Colin Clarke (01873); Ms Jennifer Mansley (01883); Mrs Sarah Taylor (01886); Ms Susan Auty (01922); Mr Allan Adam (01937); Ms Jenny Adams (01939); Ms Madeline Badger (01944); Cardross Primary School Association (01960); Ms Isabel Cullen (01974); Mr Scott Elliott (01981); Ms Morag Elliott (01983); Ms Sharon Goodwin (01986); Mr William Grant (01989); Mr And Mrs Hunter (02003); Ms Peiwah Lee (02017); Mr David MacDonald (02025); Mr Johan Machtelinckx (02031); Mr Andrew Miller (02042); Ms Christine Nevin (02050); Mr James Paterson (02055); Ms Rhoda Faye**



**Preston (02061); Ms Linda Scott (02074); Mr Ronald Ventilla (02091); Ms Margaret Ward (02092); Mr Archie Westwood (02094); Ms Liane Young (02105); Mr Rikki Young (02107); Mr John Lewis (02123)**

**H2001 only:**

**Ms Patricia Readman (00937); Mr Kenneth Readman (00938); Mrs Ruth O'Keeffe (01840); Mr Ronald Collins (01872); Ms Theresa Purdie (01876); Mr Ian Purdie (01877); Ms Elizabeth Lawrie (01882); Mr Chris Barrett (01947); Mr D V Griffiths (01994); Mr John Hendren (01996); Ms Victoria Hendren (02000)**

**H2002 only:**

**Ms Julie Lang (00696); Miss J Guthrie (01698); Ms Mavourneen Watkins (01732); Ms Myra Martin (01788); Ms Rachel Mansley (01803); Mr Robert Harvey (01808); Ms Margaret Duggan (01816); Mrs Rosemary Wilson (01818); Mr Michael Wilson (01822); Ms Elizabeth Gregory (01863); Mr Duncan Gregory (01869); Mr Michael Rostant (01874); Mr Ewan Mansley (01879); Ms Kathleen Kerr (01888); Ms Shona Cairns (01955); Ms Sharon Creasey (01975); Professor William F Deans (01976); Mr JM Henson (01999); Mr John Watkins (02093); Ms Isabel S Cullen (02113)**

**Traffic and Parking:**

**H2001 and H2002:**

**Cardross Community Council (00122); Mr Robert Murray (00463); Ms Julie Lang (00696); Mr Jim Gibb (00703); Ms Catherine Court (00765); Mrs Gillian Macdonald (01730); Ms Sabrina Dawson (01790); Ms Joan McMillan (01793); Mr Neil Buchanan (01814); Mr Paul Semple (01817); Ms Margaret Sargent (01820); Ms Amanda Murray (01836); Mr Edmund English (01839); Mrs Ruth O'Keeffe (01840); Mr Brian Craven (01846); Mr Ed Wardle (01854); Ms Karen A Adam (01858); Mr Ian Williams (01860); Ms Elizabeth Gregory (01863); Ms Avril Williams (01867); Mr Colin Clarke (01873); Mr Michael Rostant (01874); Ms Nicola Wright (01881); Ms Eileen Murray (01885); Mrs Sarah Taylor (01886); Ms Deborah Tokeley (01908); Ms Susan Auty (01922); Ms Madeline Badger (01944); Ms Joyce Borland (01949); Mr Ian Borland (01950); Mr David Branch (01952); Mr David Charles (01962); Ms Wendy Clarke (01964); Mrs Nicola Charles (01965); Dr Nicola Craise (01969); Ms Isabel Cullen (01974); Mr Scott Elliott (01981); Ms Morag Elliott (01983); Mr William Grant (01989); Ms Gwynneth Humphries (02002); Mr And Mrs Hunter (02003); Mr Jim Kinloch (02014); Mrs Stella Kinloch (02015); Ms Peiwah Lee (02017); Mr David Lockhart (02019); Mr David MacDonald (02023); Mr David MacDonald (02025); Ms Dorothy MacDonald (02026); Mr Johan Machtelinckx (02031); Ms Andrea Miller (02041); Mr Andrew Miller (02042); Mr Mark McDougall (02044); Ms Joanne Moses (02049); Ms Christine Nevin (02050); Mr James Paterson (02055); Mr And Mrs P Preston (02060); Ms Rhoda Faye Preston (02061); Mr Craig Rooney (02069); Ms Anne Ryan (02071); Mr Mark Ryan (02072); Ms Sara Sullivan (02082); Ms Dawn Thom (02085); Ms Margaret Ward (02092); Mr Archie Westwood (02094); Mr Alan Young (02102); Ms Carol Young (02103); Ms Jill Young (02104); Mr Michael Young (02106); Mr Ian Thom (02109); Ms Isabel S Cullen (02113)**

**H2001 only:**

**Ms Patricia Readman (00937); Mr Kenneth Readman (00938); Mr W J Major (01711); Mr Ronald Collins (01872); Ms Theresa Purdie (01876); Mr Ian Purdie (01877); Ms Elizabeth**

**Lawrie (01882); Ms Jennifer Mansley (01883); Ms Fiona Collins (01917); Mr Chris Barrett (01947); Ms Sharon Goodwin (01986); Mr D V Griffiths (01994); Mr John Hendren (01996); Ms Victoria Hendren (02000); Ms Caroline McNair (02039)**

**H2002 only:**

**Cardross Tenants and Residents Association (01669); Miss J Guthrie (01698); Mr Archie McIntyre (01715); Mr Stewart Macdonald (01729); Ms Mavourneen Watkins (01732); Mr And Mrs A Miller (01759); Ms Myra Martin (01788); Ms Rachel Mansley (01803); Mr Robert Harvey (01808); Ms Margaret Duggan (01816); Mrs Rosemary Wilson (01818); Mr Michael Wilson (01822); Mr Duncan Gregory (01869); Mr Ewan Mansley (01879); Ms Kathleen Kerr (01888); Ms Shona Cairns (01955); Cardross Primary School Association (01960); Mr Richard Creasey (01972); Ms Sharon Creasey (01975); Professor William F Deans (01976); Ms Rose Creasey (01977); Ms Jacqueline Gibbs (01987); Mr JM Henson (01999); Mrs Flora Leckie (02016); Mr Jack McAulay (02032); Ms Linda Scott (02074); Mr John Watkins (02093); Ms Liane Young (02105); Mr Rikki Young (02107)**

**Facilities/Lack of Facilities:**

**H2001 and H2002:**

**Cardross Community Council (00122); Mr Eric Duncan (00435); Ms Julie Lang (00696); Ms Catherine Court (00765); Cardross Tenants and Residents Association (01669); Mr W J Major (01711); Mr Stewart Macdonald (01729); Mrs Gillian Macdonald (01730); Ms Margaret Sargent (01820); Ms Amanda Murray (01836); Mr Edmund English (01839); Mrs Ruth O'Keeffe (01840); Mr Brian Craven (01846); Mr Ed Wardle (01854); Ms Karen A Adam (01858); Ms Elizabeth Gregory (01863); Mr Colin Clarke (01873); Mr Michael Rostant (01874); Ms Deborah Tokeley (01908); Ms Susan Auty (01922); Mr Allan Adam (01937); Ms Jenny Adams (01939); Ms Madeline Badger (01944); Ms Joyce Borland (01949); Mr David Branch (01952); Cardross Primary School Association (01960); Ms Sharon Goodwin (01986); Mr William Grant (01989); Mr And Mrs Hunter (02003); Ms Peiwah Lee (02017); Mr David MacDonald (02025); Mr Johan Machtelinx (02031); Mr Andrew Miller (02042); Mr James Paterson (02055); Ms Anne Ryan (02071); Mr Ronald Ventilla (02091); Ms Margaret Ward (02092); Mr Archie Westwood (02094); Ms Liane Young (02105); Mr Rikki Young (02107); Ms Isabel S Cullen (02113)**

**H2001 only:**

**Ms Patricia Readman (00937); Mr Kenneth Readman (00938); Mr Ian Williams (01860); Ms Theresa Purdie (01876); Mr Ian Purdie (01877); Ms Elizabeth Lawrie (01882); Ms Eileen Murray (01885); Mr Chris Barrett (01947); Ms Wendy Clarke (01964); Ms Morag Elliott (01983); Mr D V Griffiths (01994); Mr John Hendren (01996); Mrs Stella Kinloch (02015)**

**H2002 only:**

**Mr Robert Murray (00463); Miss J Guthrie (01698); Ms Myra Martin (01788); Ms Rachel Mansley (01803); Mr Robert Harvey (01808); Mrs Rosemary Wilson (01818); Mr Duncan Gregory (01869); Mr Ewan Mansley (01879); Ms Kathleen Kerr (01888); Mrs Nicola Charles (01965); Ms Isabel Cullen (01974); Ms Sharon Creasey (01975); Professor William F Deans (01976); Mr JM Henson (01999)**

**Agricultural Land Loss:**

**H2001 and H2002:**

**Cardross Community Council (00122); Mr Eric Duncan (00435); Mr Robert Murray (00463); Ms Julie Lang (00696); Mr Jim Gibb (00703); Mr Stewart Macdonald (01729); Mrs Gillian Macdonald (01730); Ms Sabrina Dawson (01790); Ms Joan McMillan (01793); Ms Amanda Murray (01836); Mr Edmund English (01839); Mrs Ruth O'Keeffe (01840); Mr Ed Wardle (01854); Mr Ian Williams (01860); Ms Avril Williams (01867); Mr Colin Clarke (01873); Mr Michael Rostant (01874); Ms Eileen Murray (01885); Ms Fiona Baker (01895); Ms Joyce Borland (01949); Cardross Primary School Association (01960); Mrs Nicola Charles (01965); Ms Morag Elliott (01983); Ms Gwynneth Humphries (02002); Mr And Mrs Hunter (02003); Mr Mark Kemp (02010); Mr David MacDonald (02023); Ms Dorothy MacDonald (02026); Mr James Paterson (02055); Mr And Mrs P Preston (02060); Ms Linda Scott (02074); Mr Ronald Ventilla (02091); Mr Archie Westwood (02094); Mr Rikki Young (02107); Ms Isabel S Cullen (02113)**

**H2001 only:**

**Ms Patricia Readman (00937); Mr Kenneth Readman (00938); Mr Alan Grey (01670); Ms Elizabeth Gregory (01863); Mr Ronald Collins (01872); Ms Fiona Collins (01917); Ms Wendy Clarke (01964); Mr Scott Elliott (01981)**

**H2002 only:**

**Mr Archie McIntyre (01715); Ms Myra Martin (01788); Mrs Mairi Harvey (01809); Mr Brian Craven (01846); Mr Duncan Gregory (01869); Ms Nicola Wright (01881); Mr Ian Borland (01950); Ms Shona Cairns (01955); Mr Richard Creasey (01972); Ms Sharon Creasey (01975); Professor William F Deans (01976); Mrs Flora Leckie (02016); Ms Dawn Thom (02085)**

**Nature Conservation:**

**H2001 and H2002:**

**Ms Julie Lang (00696); Mr Jim Gibb (00703); Mrs Gillian Macdonald (01730); Mr Ian Williams (01860); Ms Avril Williams (01867); Mr Colin Clarke (01873); Mr Scott Elliott (01981); Ms Morag Elliott (01983)**

**H2001 only:**

**Ms Patricia Readman (00937); Mr Kenneth Readman (00938); Scottish Natural Heritage (01587); Mr Ronald Collins (01872); Ms Theresa Purdie (01876); Mr Ian Purdie (01877); Ms Fiona Collins (01917); Mr Chris Barrett (01947); Mr John Hendren (01996); Ms Victoria Hendren (02000); Ms Caroline McNair (02039); Mr Rikki Young (02107); Ms Isabel S Cullen (02113)**

**H2002 only:**

**Mr Stewart Macdonald (01729); Ms Mavourneen Watkins (01732); Ms Myra Martin (01788); Mr Robert Harvey (01808); Mrs Mairi Harvey (01809); Mr Brian Craven (01846); Ms Kathleen Kerr (01888); Mr David Charles (01962); Ms Sharon**

**Goodwin (01986); Ms Dorothy MacDonald (02026); Ms Dawn Thom**

**Geilston:**

**H2001 and H2002:**

**(02085) Mr Edmund English (01839); Mr Michael Rostant (01874); Ms Fiona Baker (01895); Mr Ian Borland (01950); Mr David Branch (01952); Mrs Nicola Charles (01965); Mr David MacDonald (02023)**

**H2001 only:**

**Ms Patricia Readman (00937); Mr Kenneth Readman (00938); Mr Alan Grey (01670); Ms Amanda Murray (01836); Mrs Ruth O'Keeffe (01840); Mr Scott Elliott (01981); Ms Sharon Goodwin (01986); Ms Dawn Thom (02085)**

**H2002 only:**

**Ms Myra Martin (01788); Mrs Rosemary Wilson (01818); Mr Ed Wardle (01854); Ms Elizabeth Gregory (01863); Ms Avril Williams (01867); Mr David Charles (01962)**

**St. Mayhews:**

**H2001 and H2002:**

**Mr Edmund English (01839); Mr Michael Rostant (01874); Ms Joyce Borland (01949); Mr Ian Borland (01950); Mrs Nicola Charles (01965); Mr Johan Machtelinckx (02031)**

**H2001 only:**

**Mrs Ruth O'Keeffe (01840)**

**H2002 only:**

**Ms Julie Lang (00696); Ms Joan McMillan (01793); Mrs Mairi Harvey (01809); Mrs Rosemary Wilson (01818); Ms Elizabeth Gregory (01863); Ms Avril Williams (01867); Ms Nicola Wright (01881); Mr David Charles (01962); Ms Sharon Goodwin (01986)**

**Other:**

**H2001 and H2002:**

**Mr Eric Duncan (00435); Cardross Tenants and Residents Association (01669); Mr Paul Semple (01817); Mr Richard Auty (01921); Mr David Branch (01952); Ms Sara Sullivan (02082)**

**H2001 only:**

**Mrs J L Clow (01777); Mrs Ruth O'Keeffe (01840); Mr Ronald Collins (01872); Ms Victoria Hendren (02000); Ms Dawn Thom (02085)**

**H2002 only:**

**Ms Julie Lang (00696); Mr Michael Wilson (01822); Mr Edmund English (01839); Ms Sharon Goodwin (01986); Ms Rhoda Faye Preston (02061); Ms Jill Young (02104)**

**Modifications sought by those submitting representations:**

**Cardross Community Council (00122); Mr Eric Duncan (00435); Mr Robert Murray (00463); Ms Julie Lang (00696); Mr Jim Gibb (00703); Ms Catherine Court (00765); Ms Patricia Readman (00937); Mr Kenneth Readman (00938); Mrs J Clements- Jewery (01041); Scottish Natural Heritage (01587); Cardross Tenants and Residents Association (01669); Miss J Guthrie (01698); Mr W J Major (01711); Mr Archie McIntyre (01715); Mr Stewart Macdonald (01729); Mrs Gillian Macdonald (01730); Ms Mavourneen Watkins (01732); Mr And Mrs A Miller (01759); Mrs J L Clow (01777); Ms Myra Martin (01788); Ms Sabrina Dawson (01790); Ms Joan McMillan (01793); Mrs Marjorie Mackie (01797); Ms Rachel Mansley (01803); Mr Robert Harvey (01808); Mrs Mairi Harvey (01809); Mr Neil Buchanan (01814); Ms Margaret Duggan (01816); Mr Paul Semple (01817); Mrs Rosemary Wilson (01818); Ms Margaret Sargent (01820); Mr Michael Wilson (01822); Ms Amanda Murray (01836); Mr Edmund English (01839); Mrs Ruth O'Keeffe (01840); Mr Brian Craven (01846); Mr Ed Wardle (01854); Ms Karen A Adam (01858); Mr Ian Williams (01860); Ms Elizabeth Gregory (01863); Ms Avril Williams (01867); Mr Duncan Gregory (01869); Mr Ronald Collins (01872); Mr Colin Clarke (01873); Mr Michael Rostant (01874); Ms Theresa Purdie (01876); Mr Ian Purdie (01877); Mr Ewan Mansley (01879); Ms Nicola Wright (01881); Ms Elizabeth Lawrie (01882); Ms Jennifer Mansley (01883); Ms Eileen Murray (01885); Mrs Sarah Taylor (01886); Ms Kathleen Kerr (01888); Ms Fiona Baker (01895); Ms Deborah Tokeley (01908); Ms Fiona Collins (01917); Mr Richard Auty (01921); Ms Susan Auty (01922); Mr Allan Adam (01937); Ms Jenny Adams (01939); Ms Madeline Badger (01944); Mr Chris Barrett (01947); Ms Joyce Borland (01949); Mr Ian Borland (01950); Mr David Branch (01952); Ms Shona Cairns (01955); Cardross Primary School Association (01960); Mr David Charles (01962); Ms Wendy Clarke (01964); Mrs Nicola Charles (01965); Dr Nicola Craise (01969); Mr Richard Creasey (01972); Ms Isabel Cullen (01974); Ms Sharon Creasey (01975); Professor William F Deans (01976); Ms Rose Creasey (01977); Mr Scott Elliott (01981); Ms Morag Elliott (01983); Ms Sharon Goodwin (01986); Ms Jacqueline Gibbs (01987); Mr William Grant (01989); Mr D V Griffiths (01994); Mr John Hendren (01996); Mr JM Henson (01999); Ms Victoria Hendren (02000); Ms Gwynneth Humphries (02002); Mr And Mrs Hunter (02003); Mr Mark Kemp (02010); Mr Jim Kinloch (02014); Mrs Stella Kinloch (02015); Mrs Flora Leckie (02016); Ms Peiwah Lee (02017); Mr David Lockhart (02019); Mr David MacDonald (02023); Mr David MacDonald (02025); Mr David MacDonald (02025); Ms Dorothy MacDonald (02026); Mr Johan Machtelinckx (02031); Mr Jack McAulay (02032); Ms Caroline McNair (02039); Ms Andrea Miller (02041); Mr Andrew Miller (02042); Mr Mark McDougall (02044); Ms Joanne Moses (02049); Ms Christine Nevin (02050); Ms Eileen Newton (02052); Mr James Paterson (02055); Mr And Mrs P Preston (02060); Ms Rhoda Faye Preston (02061); Mr Craig Rooney (02069); Ms Anne Ryan (02071); Mr Mark Ryan (02072); Ms Linda Scott (02074); Ms Sara Sullivan (02082); Ms Dawn Thom (02085); Mr Ronald Ventilla (02091); Ms Margaret Ward (02092); Mr John Watkins (02093); Mr Archie Westwood (02094); Mr Alan Young (02102); Ms Carol Young (02103); Ms Jill Young (02104); Ms Liane Young (02105); Mr Michael Young (02106); Mr Rikki Young (02107); Mr Ian Thom (02109); Mr And Mrs Sweeney (02112); Ms Isabel S Cullen (02113); Mr John Lewis (02123)**

The above have sought, either the removal of site H2001 and / or H2002 from the plan, or a

reduction in numbers of houses on the sites, or improvements to infrastructure and services in Cardross in order to accommodate the proposed development.

**Summary of responses (including reasons) by planning authority:**

**Scale/Character of Village/Conservation Area:**

**H2001 and H2002:**

**Cardross Community Council (00122); Mr Eric Duncan (00435); Ms Julie Lang (00696); Mr Jim Gibb (00703); Mr W J Major (01711); Mrs Gillian Macdonald (01730); Ms Joan McMillan (01793); Mr Paul Semple (01817); Ms Amanda Murray (01836); Mr Edmund English (01839); Mrs Ruth O'Keeffe (01840); Mr Brian Craven (01846); Mr Ed Wardle (01854); Ms Karen A Adam (01858); Mr Colin Clarke (01873); Ms Nicola Wright (01881); Ms Eileen Murray (01885); Mrs Sarah Taylor (01886); Ms Fiona Baker (01895); Ms Susan Auty (01922); Mr Allan Adam (01937); Ms Jenny Adams (01939); Ms Madeline Badger (01944); Mr David Branch (01952); Mr David Charles (01962); Ms Wendy Clarke (01964); Ms Isabel Cullen (01974); Mr Scott Elliott (01981); Ms Morag Elliott (01983); Ms Sharon Goodwin (01986); Ms Gwynneth Humphries (02002); Mr David Lockhart (02019); Mr David MacDonald (02023); Ms Dorothy MacDonald (02026); Mr Jack McAulay (02032); Ms Caroline McNair (02039); Mr Mark McDougall (02044); Ms Joanne Moses (02049); Ms Eileen Newton (02052); Mr James Paterson (02055); Mr And Mrs P Preston (02060); Ms Rhoda Faye Preston (02061); Ms Anne Ryan (02071); Mr Mark Ryan (02072); Ms Sara Sullivan (02082); Ms Dawn Thom (02085); Mr Ronald Ventilla (02091); Ms Margaret Ward (02092); Ms Carol Young (02103); Ms Liane Young (02105); Mr Michael Young (02106); Mr Rikki Young (02107); Mr Ian Thom (02109); Ms Isabel S Cullen (02113)**

**H2001 only:**

**Mr Robert Murray (00463); Ms Patricia Readman (00937); Mr Alan Grey (01670); Mrs Marjorie Mackie (01797); Ms Elizabeth Gregory (01863); Mr Ronald Collins (01872); Ms Theresa Purdie (01876); Mr Ian Purdie (01877); Ms Elizabeth Lawrie (01882); Mr John Hendren (01996); Mr David MacDonald (02025); Mr Johan Machtelinx (02031); Mr And Mrs Sweeney (02112)**

**H2002 only:**

**Ms Mavourneen Watkins (01732); Ms Myra Martin (01788); Ms Sabrina Dawson (01790); Ms Rachel Mansley (01803); Mrs Mairi Harvey (01809); Mr Ian Williams (01860); Mr Duncan Gregory (01869); Mr Ewan Mansley (01879); Ms Jennifer Mansley (01883); Ms Kathleen Kerr (01888); Ms Shona Cairns (01955); Professor William F Deans (01976); Ms Rose Creasey (01977); Ms Christine Nevin (02050); Ms Jill Young (02104)**

Cardross is the second largest settlement in Helensburgh and Lomond, with a population of over 2000, it is one of the larger settlements in Argyll and Bute. Some settlements have more capacity to accommodate growth than others in term of availability of land, access to services and facilities, as well as desirability and ease of assimilation with existing communities. Over the years there have been several phases of major development in Cardross, the last major release of land for development purposes being in the Dumbarton District District Wide Local Plan Adopted in 1999, resulting in CALA's Fairways development

in the early 2000's. Following on from this there were numerous representations made to the last local plan to have additional land identified for further housing release in Cardross, however, this approach was rejected by the council, who considered that it would be appropriate to allow some time to allow the recent development to settle down and assimilate in to the community. This approach was endorsed by the Reporters at the 2008 inquiry in to the Argyll and Bute Local Plan, whilst at the same time recognising that future consideration of the proposed sites would be appropriate as part of a wider green belt review.

The Conservation area at Cardross lies to the east end of the village and is centred on the Old Parish Church and Manse, the listed buildings and parkland like setting associated with Auchinfroe and Bloomhill, together with some older parts of the village to the south of the A814, bounded by Station Road to the west. Both the proposed allocations H2001 and H2002 are located to the west of the village, separated by a wide mixture of both more traditional and modern development from the conservation area, and as such are considered to have no effect of the conservation area.

**Scale/Density:**

**H2001 only:**

**Ms Amanda Murray (01836); Mr Brian Craven (01846)**

**H2002 only:**

**Mr Ed Wardle (01854)**

The scale of the proposed housing land release has been determined by the area of land available within each of the various landscape compartments/fields available, and having regard to the access and servicing requirements associated with it. The proposed density of both sites is medium scale, this reflects the desire of the Council to promote a wider range of house sizes and types (including provision for affordable housing) in accord with the needs identified in the Housing Need and Demand Assessment and the aims of SPP (see Core Document xxxx para xxxx).

**Housing Need:**

**H2001 and H2002:**

**Cardross Community Council (00122); Mr Robert Murray (00463); Mr Jim Gibb (00703); Mrs Gillian Macdonald (01730); Ms Margaret Sargent (01820); Mr David Branch (01952); Ms Christine Nevin (02050); Ms Sara Sullivan (02082); Ms Liane Young (02105)**

**H2001 only:**

**Ms Julie Lang (00696); Ms Patricia Readman (00937); Mr Kenneth Readman (00938); Mr W J Major (01711); Ms Amanda Murray (01836); Ms Eileen Murray (01885); Ms Jenny Adams (01939); Mr D V Griffiths (01994)**

**H2002 only:**

**Mr Archie McIntyre (01715); Mr Stewart Macdonald (01729); Mrs Mairi Harvey (01809); Mr Ed Wardle (01854); Ms Elizabeth Gregory (01863); Mr Rikki Young (02107)**

The requirement for additional housing allocations in Cardross has been informed by the Argyll and Bute Housing Need and Demand Assessment, which has been approved as robust and credible by the Scottish Government. The Housing Need and Demand Assessment (see Core Document ref xxxx) has indicated that there is a need for over 1200 new homes over a ten year period in Helensburgh and Lomond. The Housing Land Audit (see Core Document ref xxxx) establishes that there is currently a potential 727 units available from existing allocations, potential development areas, and windfall sites within the Helensburgh and Lomond Housing Market Area. There is therefore a demonstrable need to release additional land for development in order to provide for the established local housing needs of the area.

### **Brownfield in Glasgow/Dumbarton:**

#### **H2001 and H2002:**

**Mrs Nicola Charles (01965); Ms Sara Sullivan (02082); Ms Liane Young (02105)**

#### **H2001 only:**

**Mr Kenneth Readman (00938)**

#### **H2002 only:**

**Ms Eileen Murray (01885); Mr David Charles (01962); Mr Jack McAulay (02032); Mr Rikki Young (02107)**

The Argyll and Bute Local Development Plan seeks to provide a set of policies, Supplementary Guidance and Proposals Maps to guide the land uses of the area (excluding the Loch Lomond and Trossachs National Park) for which the Council is responsible as a planning authority. Helensburgh and Lomond, despite its relative close proximity to Glasgow and its border with West Dunbartonshire, is not included within the Glasgow and Clyde Valley Strategic Plan area as set up by statute by the Scottish Parliament, and as such there is no remit for the Council to abdicate its responsibility to make appropriate provision for its housing land requirement to other planning authorities.

In addition, the overarching objective of the Council's SOA (Core Doc. Ref. xxxx) agreement is to deliver economic success through a growing population which is in turn supportive of the 6 national policy priorities set out in the national guidance on community planning.

### **Green Belt Loss:**

#### **H2001 and H2002:**

**Cardross Community Council (00122); Mr Eric Duncan (00435); Mr Robert Murray (00463); Ms Julie Lang (00696); Mrs J Clements- Jewery (01041); Mr Stewart Macdonald (01729); Mrs Gillian Macdonald (01730); Ms Amanda Murray (01836); Mr Edmund English (01839); Mrs Ruth O'Keeffe (01840); Mr Colin Clarke (01873); Ms Jennifer Mansley (01883); Ms Eileen Murray (01885); Ms Fiona Baker (01895); Mr Allan Adam (01937); Ms Madeline Badger (01944); Mr David Branch (01952); Cardross Primary School Association (01960); Mr David Charles (01962); Ms Wendy Clarke (01964); Mrs Nicola Charles (01965); Mr Scott Elliott (01981); Ms Morag Elliott (01983); Mr William Grant (01989); Mr And Mrs Hunter (02003); Mr Mark Kemp (02010); Ms Andrea Miller (02041); Mr Mark McDougall (02044); Ms Christine Nevin (02050); Mr And Mrs P Preston (02060); Ms Linda Scott (02074); Ms Dawn Thom (02085); Ms Carol Young (02103); Ms Liane Young (02105); Mr Michael**



**Young (02106); Mr Rikki Young (02107); Ms Isabel S Cullen (02113)**

**H2001 only:**

**Mr Jim Gibb (00703); Ms Patricia Readman (00937); Mr Kenneth Readman (00938); Mr Alan Grey (01670); Ms Sabrina Dawson (01790); Mr Ronald Collins (01872); Ms Nicola Wright (01881); Ms Elizabeth Lawrie (01882); Ms Fiona Collins (01917); Ms Susan Auty (01922); Mr Chris Barrett (01947); Mr D V Griffiths (01994); Mr Jack McAulay (02032)**

**H2002 only:**

**Ms Myra Martin (01788); Ms Joan McMillan (01793); Ms Rachel Mansley (01803); Mrs Mairi Harvey (01809); Mrs Rosemary Wilson (01818); Mr Brian Craven (01846); Mr Ed Wardle (01854); Mr Duncan Gregory (01869); Mr Ewan Mansley (01879); Ms Shona Cairns (01955); Mr Richard Creasey (01972); Ms Sharon Creasey (01975); Ms Rose Creasey (01977); Mr Alan Young (02102)**

The need to identify additional land for housing has been established in the HNDA and the Housing Land Audit. The Council had commissioned a Green Belt Landscape Study (Core Document xxxx) to help inform decisions as to the options which might be available for land release. Both areas at Kirkton Farm and Geilston farm were specifically examined as part of this. This study's recommendations regarding avoiding the higher ground and eastern field at Kirkton and the lower lying area adjacent to the railway and also the area adjacent to the Geilston Burn have all been taken on board. Supplementary Guidance in the form of a mini development brief will include the requirement for strong boundary features to be established as part of any new development thereby creating new strong, defensible green belt boundaries.

**Ribbon Development:**

**H2001 and H2002**

**Ms Dorothy MacDonald (02026)**

**H2001 only:**

**Mr Scott Elliott (01981)**

Both sites are proposed Allocations in the Proposed plan, this would require a co-ordinated approach to development and involve provision for internal access roads, servicing and open space. This is not ribbon development which is traditionally defined as a string of houses one house deep fronting on to arterial roads developed in an uncoordinated manner, typified by developments of the interwar era, and prior to the 1947 Planning Act.

**Employment Opportunities:**

**H2001 and H2002:**

**Ms Julie Lang (00696); Mr W J Major (01711); Ms Joan McMillan (01793); Mr Brian Craven (01846); Ms Karen A Adam (01858); Ms Eileen Murray (01885); Ms Wendy Clarke (01964); Mr Scott Elliott (01981); Mr And Mrs Hunter (02003); Ms Isabel S Cullen (02113)**

### H2001 only:

**Cardross Community Council (00122); Mr Eric Duncan (00435); Ms Patricia Readman (00937); Mr Chris Barrett (01947); Mrs Nicola Charles (01965)**

### H2002 only:

**Mr Jim Gibb (00703); Ms Myra Martin (01788); Mr Robert Harvey (01808); Ms Margaret Duggan (01816); Mr Colin Clarke (01873); Ms Shona Cairns (01955)**

While Cardross may have limited employment opportunities there are a number of employers in the village such as the sawmill, retail, pubs, hotel, golf course etc. and there are also frequent public transport services available, with bus stops on the main road through the settlement and also a frequent train service between Helensburgh, Glasgow and further afield. The Council intends for Cardross to be served by superfast broadband as part of the Digital Scotland investment plan that is being led by the Scottish Government in the Helensburgh and Lomond area. In addition, the Council has plans to extend the dedicated cycle route from Helensburgh to Cardross that will help promote active travel to major employment centres in Helensburgh (the largest town in Argyll and Bute) and the likes of Faslane (the largest single employment site in the west of Scotland). It should also be noted that the Council considers that a high number of additional jobs have the potential to be created through significant future investment as part of the UK Government's Maritime Change Programme (see production **xxxx**); and failing this through the Scottish Government's recent commitment to develop a Scottish Naval and Military base at Faslane, dependent upon the outcome of the 2014 referendum.

### School Capacity:

#### H2001 and H2002:

**Cardross Community Council (00122); Mr Eric Duncan (00435); Mr Robert Murray (00463); Mr Jim Gibb (00703); Ms Catherine Court (00765); Mr W J Major (01711); Mr Stewart Macdonald (01729); Mrs Gillian Macdonald (01730); Ms Sabrina Dawson (01790); Ms Joan McMillan (01793); Mr Paul Semple (01817); Ms Margaret Sargent (01820); Ms Amanda Murray (01836); Mr Edmund English (01839); Mrs Ruth O'Keeffe (01840); Mr Brian Craven (01846); Mr Ed Wardle (01854); Ms Karen A Adam (01858); Mr Ian Williams (01860); Ms Avril Williams (01867); Mr Michael Rostant (01874); Ms Nicola Wright (01881); Ms Eileen Murray (01885); Mrs Sarah Taylor (01886); Ms Deborah Tokeley (01908); Ms Susan Auty (01922); Mr Allan Adam (01937); Ms Jenny Adams (01939); Ms Joyce Borland (01949); Mr Ian Borland (01950); Mr David Branch (01952); Cardross Primary School Association (01960); Ms Wendy Clarke (01964); Dr Nicola Craise (01969); Ms Isabel Cullen (01974); Mr Scott Elliott (01981); Ms Morag Elliott (01983); Ms Sharon Goodwin (01986); Mr And Mrs Hunter (02003); Mr Jim Kinloch (02014); Mrs Stella Kinloch (02015); Mr David Lockhart (02019); Mr David MacDonald (02023); Mr David MacDonald (02025); Ms Dorothy MacDonald (02026); Mr Johan Machtelinckx (02031); Ms Andrea Miller (02041); Mr Andrew Miller (02042); Mr Mark McDougall (02044); Ms Rhoda Faye Preston (02061); Mr Craig Rooney (02069); Ms Anne Ryan (02071); Mr Mark Ryan (02072); Ms Linda Scott (02074); Ms Dawn Thom (02085); Ms Margaret Ward (02092); Mr Archie Westwood (02094); Ms Carol Young (02103); Ms Jill Young (02104); Mr Michael Young (02106); Mr Rikki Young (02107); Ms Isabel S Cullen (02113); Mr John Lewis (02123)**

**H2001 only:**

**Ms Julie Lang (00696); Ms Elizabeth Gregory (01863); Mr Colin Clarke (01873); Ms Theresa Purdie (01876); Mr Ian Purdie (01877); Mr Alan Young (02102); Ms Liane Young (02105)**

**H2002 only:**

**Mr Archie McIntyre (01715); Cardross Tenants and Residents Association (01669); Mr Duncan Gregory (01869); Mr James Paterson (02055); Mr Michael Wilson (01822); Mr Robert Harvey (01808); Ms Caroline McNair (02039); Professor William F Deans (01976); Ms Jacqueline Gibbs (01987); Ms Kathleen Kerr (01888); Ms Margaret Duggan (01816); Ms Mavourneen Watkins (01732); Ms Myra Martin (01788); Ms Shona Cairns (01955); Mrs Flora Leckie (02016)**

The Councils education service has advised that the capacity of Cardross Primary School is 294 pupils. The school roll for the academic year 2012/13 was 182 (Production Ref xxxx). The Council therefore does not accept that the school is at or near capacity or that it would not be able to cope with the potential increase in numbers of school children which may occur as a result of the proposed development(s). There are many factors which can influence demand for school places, with availability of new housing being only one of these. If in the event that additional school accommodation is required, then the Council as education authority will address these.

**Drainage/Flooding H2001 and H2002:**

**Cardross Community Council (00122); Mr Eric Duncan (00435); Ms Catherine Court (00765); Cardross Tenants and Residents Association (01669); Mr W J Major (01711); Mr Stewart Macdonald (01729); Mrs Gillian Macdonald (01730); Ms Margaret Sargent (01820); Ms Amanda Murray (01836); Mr Brian Craven (01846); Mr Ed Wardle (01854); Ms Karen A Adam (01858); Mr Colin Clarke (01873); Ms Jennifer Mansley (01883); Mrs Sarah Taylor (01886); Ms Susan Auty (01922); Mr Allan Adam (01937); Ms Jenny Adams (01939); Ms Madeline Badger (01944); Cardross Primary School Association (01960); Ms Isabel Cullen (01974); Mr Scott Elliott (01981); Ms Morag Elliott (01983); Ms Sharon Goodwin (01986); Mr William Grant (01989); Mr And Mrs Hunter (02003); Ms Peiwah Lee (02017); Mr David MacDonald (02025); Mr Johan Machtelinx (02031); Mr Andrew Miller (02042); Ms Christine Nevin (02050); Mr James Paterson (02055); Ms Rhoda Faye Preston (02061); Ms Linda Scott (02074); Mr Ronald Ventilla (02091); Ms Margaret Ward (02092); Mr Archie Westwood (02094); Ms Liane Young (02105); Mr Rikki Young (02107); Mr John Lewis (02123)**

**H2001 only:**

**Ms Patricia Readman (00937); Mr Kenneth Readman (00938); Mrs Ruth O'Keeffe (01840); Mr Ronald Collins (01872); Ms Theresa Purdie (01876); Mr Ian Purdie (01877); Ms Elizabeth Lawrie (01882); Mr Chris Barrett (01947); Mr D V Griffiths (01994); Mr John Hendren (01996); Ms Victoria Hendren (02000)**

**H2002 only:**

**Ms Julie Lang (00696); Miss J Guthrie (01698); Ms Mavourneen Watkins (01732); Ms Myra Martin (01788); Ms Rachel Mansley (01803); Mr Robert Harvey (01808); Ms Margaret Duggan (01816); Mrs Rosemary Wilson (01818); Mr Michael**

**Wilson (01822); Ms Elizabeth Gregory (01863); Mr Duncan Gregory (01869); Mr Michael Rostant (01874); Mr Ewan Mansley (01879); Ms Kathleen Kerr (01888); Ms Shona Cairns (01955); Ms Sharon Creasey (01975); Professor William F Deans (01976); Mr JM Henson (01999); Mr John Watkins (02093); Ms Isabel S Cullen (02113)**

It should be noted that no objection to both these sites have been raised by SEPA with regard to flooding. In relation to concerns about drainage and increased flood risk, as part of the proposals for development the developers will be required to submit a flood risk assessment, and include designs for a sustainable urban drainage scheme which will ensure that there will be no increase in run off and consequent risk of flooding as a result of any development. The developers will also be required to undertake a drainage impact assessment to ensure that the existing foul water drainage systems in the area are sufficient to accommodate the proposed new developments without any adverse effects on neighbouring properties. Both developers have submitted schemes to indicating that they have taken these matters into consideration and are confident that they will be able to address these at the detailed design stage. (see productions xxxx and xxxx)

### **Traffic and Parking:**

#### **H2001 and H2002:**

**Cardross Community Council (00122); Mr Robert Murray (00463); Ms Julie Lang (00696); Mr Jim Gibb (00703); Ms Catherine Court (00765); Mrs Gillian Macdonald (01730); Ms Sabrina Dawson (01790); Ms Joan McMillan (01793); Mr Neil Buchanan (01814); Mr Paul Semple (01817); Ms Margaret Sargent (01820); Ms Amanda Murray (01836); Mr Edmund English (01839); Mrs Ruth O'Keeffe (01840); Mr Brian Craven (01846); Mr Ed Wardle (01854); Ms Karen A Adam (01858); Mr Ian Williams (01860); Ms Elizabeth Gregory (01863); Ms Avril Williams (01867); Mr Colin Clarke (01873); Mr Michael Rostant (01874); Ms Nicola Wright (01881); Ms Eileen Murray (01885); Mrs Sarah Taylor (01886); Ms Deborah Tokeley (01908); Ms Susan Auty (01922); Ms Madeline Badger (01944); Ms Joyce Borland (01949); Mr Ian Borland (01950); Mr David Branch (01952); Mr David Charles (01962); Ms Wendy Clarke (01964); Mrs Nicola Charles (01965); Dr Nicola Craise (01969); Ms Isabel Cullen (01974); Mr Scott Elliott (01981); Ms Morag Elliott (01983); Mr William Grant (01989); Ms Gwynneth Humphries (02002); Mr And Mrs Hunter (02003); Mr Jim Kinloch (02014); Mrs Stella Kinloch (02015); Ms Peiwah Lee (02017); Mr David Lockhart (02019); Mr David MacDonald (02023); Mr David MacDonald (02025); Ms Dorothy MacDonald (02026); Mr Johan Machtelinckx (02031); Ms Andrea Miller (02041); Mr Andrew Miller (02042); Mr Mark McDougall (02044); Ms Joanne Moses (02049); Ms Christine Nevin (02050); Mr James Paterson (02055); Mr And Mrs P Preston (02060); Ms Rhoda Faye Preston (02061); Mr Craig Rooney (02069); Ms Anne Ryan (02071); Mr Mark Ryan (02072); Ms Sara Sullivan (02082); Ms Dawn Thom (02085); Ms Margaret Ward (02092); Mr Archie Westwood (02094); Mr Alan Young (02102); Ms Carol Young (02103); Ms Jill Young (02104); Mr Michael Young (02106); Mr Ian Thom (02109); Ms Isabel S Cullen (02113)**

#### **H2001 only:**

**Ms Patricia Readman (00937); Mr Kenneth Readman (00938); Mr W J Major (01711); Mr Ronald Collins (01872); Ms Theresa Purdie (01876); Mr Ian Purdie (01877); Ms Elizabeth Lawrie (01882); Ms Jennifer Mansley (01883); Ms Fiona Collins (01917); Mr Chris Barrett (01947); Ms Sharon Goodwin (01986); Mr D V Griffiths (01994); Mr John Hendren (01996); Ms Victoria Hendren (02000); Ms Caroline McNair (02039)**

**H2002 only:**

**Cardross Tenants and Residents Association (01669); Miss J Guthrie (01698); Mr Archie McIntyre (01715); Mr Stewart Macdonald (01729); Ms Mavourneen Watkins (01732); Mr And Mrs A Miller (01759); Ms Myra Martin (01788); Ms Rachel Mansley (01803); Mr Robert Harvey (01808); Ms Margaret Duggan (01816); Mrs Rosemary Wilson (01818); Mr Michael Wilson (01822); Mr Duncan Gregory (01869); Mr Ewan Mansley (01879); Ms Kathleen Kerr (01888); Ms Shona Cairns (01955); Cardross Primary School Association (01960); Mr Richard Creasey (01972); Ms Sharon Creasey (01975); Professor William F Deans (01976); Ms Rose Creasey (01977); Ms Jacqueline Gibbs (01987); Mr JM Henson (01999); Mrs Flora Leckie (02016); Mr Jack McAulay (02032); Ms Linda Scott (02074); Mr John Watkins (02093); Ms Liane Young (02105); Mr Rikki Young (02107)**

The area road engineer has raised no concerns in relation to the ability of the road network to cope with the additional traffic associated with the proposed Allocations. In the case of Kirkton Farm, the developers have submitted proposals which demonstrate the access to the site being taken from Darlieth Road and have shown a scheme of improvements which the Councils Area Road Engineer has indicated in principle would be appropriate to accommodate the proposed development (see production no xxxx).

Similarly the potential developers at Geilston Farm have submitted a scheme which takes access from the A814 via an improved Murray's Road, which is also considered to be acceptable (see production no xxxx) by the Council.

The objectors have submitted no evidence to demonstrate that Cardross Station Car park suffers from capacity problems at present. The station car park currently has 44 car parking spaces (including 2 disabled), the Council's aerial photography (see production xxxx) indicates that there were 9 spaces plus 2 disabled bays unoccupied, and a survey on 22<sup>nd</sup> April 2013 at 10:13 showed that there were 8 vacant spaces. It should also be noted that both proposed sites will be within a relatively short walking distance of the station and in particular the Geilston farm site will have a direct pedestrian path linking the site to the station.

**Facilities/Lack of Facilities:**

**H2001 and H2002:**

**Cardross Community Council (00122); Mr Eric Duncan (00435); Ms Julie Lang (00696); Ms Catherine Court (00765); Cardross Tenants and Residents Association (01669); Mr W J Major (01711); Mr Stewart Macdonald (01729); Mrs Gillian Macdonald (01730); Ms Margaret Sargent (01820); Ms Amanda Murray (01836); Mr Edmund English (01839); Mrs Ruth O'Keefe (01840); Mr Brian Craven (01846); Mr Ed Wardle (01854); Ms Karen A Adam (01858); Ms Elizabeth Gregory (01863); Mr Colin Clarke (01873); Mr Michael Rostant (01874); Ms Deborah Tokeley (01908); Ms Susan Auty (01922); Mr Allan Adam (01937); Ms Jenny Adams (01939); Ms Madeline Badger (01944); Ms Joyce Borland (01949); Mr David Branch (01952); Cardross Primary School Association (01960); Ms Sharon Goodwin (01986); Mr William Grant (01989); Mr And Mrs Hunter (02003); Ms Peiwah Lee (02017); Mr David MacDonald (02025); Mr Johan Machtelinx (02031); Mr Andrew Miller (02042); Mr James Paterson (02055); Ms Anne Ryan (02071); Mr Ronald Ventilla (02091); Ms Margaret Ward (02092); Mr Archie Westwood (02094); Ms Liane Young (02105); Mr Rikki Young (02107); Ms Isabel S Cullen (02113)**

### H2001 only:

**Ms Patricia Readman (00937); Mr Kenneth Readman (00938); Mr Ian Williams (01860); Ms Theresa Purdie (01876); Mr Ian Purdie (01877); Ms Elizabeth Lawrie (01882); Ms Eileen Murray (01885); Mr Chris Barrett (01947); Ms Wendy Clarke (01964); Ms Morag Elliott (01983); Mr D V Griffiths (01994); Mr John Hendren (01996); Mrs Stella Kinloch (02015)**

### H2002 only:

**Mr Robert Murray (00463); Miss J Guthrie (01698); Ms Myra Martin (01788); Ms Rachel Mansley (01803); Mr Robert Harvey (01808); Mrs Rosemary Wilson (01818); Mr Duncan Gregory (01869); Mr Ewan Mansley (01879); Ms Kathleen Kerr (01888); Mrs Nicola Charles (01965); Ms Isabel Cullen (01974); Ms Sharon Creasey (01975); Professor William F Deans (01976); Mr JM Henson (01999)**

Cardross has a post office, pharmacy, national trust property, various shops, garages, hotels/pubs, hairdressers, café, golf, tennis and bowling clubs, recreation ground, nursery, hall, library, rail station, churches, as well as a primary school, and is well served by public transport (bus and rail), the settlement therefore enjoys a considerable range of facilities and amenities for a settlement of this size. The Council considers that additional new homes in the village will help support the sustainability of these facilities through an increased population in the village.

### Agricultural Land Loss:

#### H2001 and H2002:

**Cardross Community Council (00122); Mr Eric Duncan (00435); Mr Robert Murray (00463); Ms Julie Lang (00696); Mr Jim Gibb (00703); Mr Stewart Macdonald (01729); Mrs Gillian Macdonald (01730); Ms Sabrina Dawson (01790); Ms Joan McMillan (01793); Ms Amanda Murray (01836); Mr Edmund English (01839); Mrs Ruth O'Keeffe (01840); Mr Ed Wardle (01854); Mr Ian Williams (01860); Ms Avril Williams (01867); Mr Colin Clarke (01873); Mr Michael Rostant (01874); Ms Eileen Murray (01885); Ms Fiona Baker (01895); Ms Joyce Borland (01949); Cardross Primary School Association (01960); Mrs Nicola Charles (01965); Ms Morag Elliott (01983); Ms Gwynneth Humphries (02002); Mr And Mrs Hunter (02003); Mr Mark Kemp (02010); Mr David MacDonald (02023); Ms Dorothy MacDonald (02026); Mr James Paterson (02055); Mr And Mrs P Preston (02060); Ms Linda Scott (02074); Mr Ronald Ventilla (02091); Mr Archie Westwood (02094); Mr Rikki Young (02107); Ms Isabel S Cullen (02113)**

#### H2001 only:

**Ms Patricia Readman (00937); Mr Kenneth Readman (00938); Mr Alan Grey (01670); Ms Elizabeth Gregory (01863); Mr Ronald Collins (01872); Ms Fiona Collins (01917); Ms Wendy Clarke (01964); Mr Scott Elliott (01981)**

#### H2002 only:

**Mr Archie McIntyre (01715); Ms Myra Martin (01788); Mrs Mairi Harvey (01809); Mr Brian Craven (01846); Mr Duncan Gregory (01869); Ms Nicola Wright (01881); Mr Ian Borland (01950); Ms Shona Cairns (01955); Mr Richard Creasey (01972); Ms Sharon Creasey (01975); Professor William F Deans (01976); Mrs Flora Leckie (02016); Ms**

**Dawn Thom (02085)**

Scottish Planning Policy (core document xxxx) Paragraph 97 refers to prime quality agricultural land. This is defined a Class 1, 2 or 3.1 in the land capability for agriculture developed by the Macaulay Land Use Research Institute. The Geilston Farm site is shown as Class 3.1 on the Macaulay Maps, and the Kirkton Farm site as 3.2. Development of prime quality agricultural land is permitted by SPP where it is an essential component of a settlement strategy or is necessary to meet an established need. The settlement strategy of the Proposed Local Development Plan reflects the aims outlined in the Main Issues Report to create more sustainable communities, directing development to settlements which enjoy a range of facilities and are accessible by a variety of means of transport. Both the Housing Need and Demand Assessment (core document xxxx) and the Housing Land Audit (core document xxxx) confirm an established need for additional housing land release in the area. While the loss of the agricultural land is regrettable this has to be balanced by the wider needs of the area as detailed above and also the findings of the landscape capacity study.

**Nature Conservation:**

**H2001 and H2002:**

**Ms Julie Lang (00696); Mr Jim Gibb (00703); Mrs Gillian Macdonald (01730); Mr Ian Williams (01860); Ms Avril Williams (01867); Mr Colin Clarke (01873); Mr Scott Elliott (01981); Ms Morag Elliott (01983)**

**H2001 only:**

**Ms Patricia Readman (00937); Mr Kenneth Readman (00938); Scottish Natural Heritage (01587); Mr Ronald Collins (01872); Ms Theresa Purdie (01876); Mr Ian Purdie (01877); Ms Fiona Collins (01917); Mr Chris Barrett (01947); Mr John Hendren (01996); Ms Victoria Hendren (02000); Ms Caroline McNair (02039); Mr Rikki Young (02107); Ms Isabel S Cullen (02113)**

**H2002 only:**

**Mr Stewart Macdonald (01729); Ms Mavourneen Watkins (01732); Ms Myra Martin (01788); Mr Robert Harvey (01808); Mrs Mairi Harvey (01809); Mr Brian Craven (01846); Ms Kathleen Kerr (01888); Mr David Charles (01962); Ms Sharon Goodwin (01986); Ms Dorothy MacDonald (02026); Ms Dawn Thom**

The Geilston Farm site is in use for crop growing and the Kirkton Farm site is improved pasture land. The proposed developers have submitted reports (see production xxxx and xxxx) which include ecologist's reports, indicating limited ecological value, confined to trees and hedgerows on the margins. Further more detailed investigation would be carried out prior to works commencing on site, and appropriate mitigation measures provided as required if any protected species are found. The Geilston Farm site is located adjacent to the Geilston Burn SSSI. The SSSI is designated for its geomorphological interest (see production xxxx). The proposed development site deliberately does not encroach on the designated site and adverse effects either directly or indirectly on the designation are not anticipated as a result of the proposed development.

**Geilston:**

**H2001 and H2002:**

(02085) **Mr Edmund English** (01839); **Mr Michael Rostant** (01874); **Ms Fiona Baker** (01895); **Mr Ian Borland** (01950); **Mr David Branch** (01952); **Mrs Nicola Charles** (01965); **Mr David MacDonald** (02023)

**H2001 only:**

**Ms Patricia Readman** (00937); **Mr Kenneth Readman** (00938); **Mr Alan Grey** (01670); **Ms Amanda Murray** (01836); **Mrs Ruth O'Keeffe** (01840); **Mr Scott Elliott** (01981); **Ms Sharon Goodwin** (01986); **Ms Dawn Thom** (02085)

**H2002 only:**

**Ms Myra Martin** (01788); **Mrs Rosemary Wilson** (01818); **Mr Ed Wardle** (01854); **Ms Elizabeth Gregory** (01863); **Ms Avril Williams** (01867); **Mr David Charles** (01962)

Geilston House and Walled Garden is category B listed and was left to the National Trust for Scotland, only the gardens are open to the public. (see production no xxxx <http://data.historic-scotland.gov.uk/pls/htmlldb/f?p=2200:15:741391325702995:::BUILDING:1181>). Both the house and gardens are set back from the road and are not directly visible from either site, and when visiting appear to be set in relatively self contained landscape. The proposed allocations are therefore considered to have little impact upon the house or any of its associated listed structures. Geilston is subject to a separate representation from the National Trust regarding its long term future which, the Council submits, are likely to have much more direct impacts on the property, than either of the two proposed housing allocations if they are permitted to proceed.

**St. Mayhews:**

**H2001 and H2002:**

**Mr Edmund English** (01839); **Mr Michael Rostant** (01874); **Ms Joyce Borland** (01949); **Mr Ian Borland** (01950); **Mrs Nicola Charles** (01965); **Mr Johan Machtelinckx** (02031)

**H2001 only:**

**Mrs Ruth O'Keeffe** (01840)

**H2002 only:**

**Ms Julie Lang** (00696); **Ms Joan McMillan** (01793); **Mrs Mairi Harvey** (01809); **Mrs Rosemary Wilson** (01818); **Ms Elizabeth Gregory** (01863); **Ms Avril Williams** (01867); **Ms Nicola Wright** (01881); **Mr David Charles** (01962); **Ms Sharon Goodwin** (01986)

Saint Mahew's chapel lies to the north of the Kirkton Farm site separated by a lane. It is category A listed (see Production no xxxx <http://data.historic-scotland.gov.uk/pls/htmlldb/f?p=2200:15:0:::BUILDING:42905>)

The proposed allocation does not have a direct effect on the building or its associated curtilage, although it will have an effect on the rural nature of the chapel when approaching from Cardross. These impacts are considered to be acceptable in the context of the overall development strategy for the area, and have not been raised as an issue by Historic Scotland in their response to the Proposed Local Development Plan.



## **Support with provision of 25% housing for Social Rent**

### **H2001 and H2002:**

#### **Cardross Tenants and Residents Association (01669)**

The proposed allocations require provision to be made for affordable housing in line with the provisions of paras 86 to 88 of Scottish Planning Policy (see core document xxxx). This allows for a range of tenure types including social rented, and sets 25% provision as a benchmark.

### **Improved Broadband**

#### **H2001 and H2002:**

##### **Mr Richard Auty (01921)**

The Council is committed to supporting improved broadband services throughout its area, however the availability of high speed broadband services is not considered to be a prerequisite for the allocation of land for residential development.

### **Affect on Tourism Opportunities at St Peters/Kilmahew**

#### **H2001 and H2002:**

##### **Mr David Branch (01952)**

The proposed allocations are to the west of Cardross and are not considered to have an effect on the setting of or the opportunities which might be associated with the redevelopment of St Peters Seminary/ the Kilmahew estate.

### **Loss of Recreational Opportunities:**

#### **H2001 and H2002:**

##### **Ms Sara Sullivan (02082)**

#### **H2002 only**

##### **Mr Michael Wilson (01822); Ms Sharon Goodwin (01986); Ms Jill Young (02104)**

The use of woodland footpaths, and minor roads adjacent to both sites for recreation and to gain access to the wider countryside, will not be directly affected by the proposed allocations. The prospective developers have submitted schemes which show how their proposals will integrate with the access network, and these will safeguard existing routes and provide opportunities for the creation of new routes. (see productions xxxx and xxxx).

### **Loss of privacy and amenity**

#### **H2001 only:**

##### **Mrs J L Clow (01777); Mr Ronald Collins (01872); Ms Victoria Hendren (02000);**

#### **H2002 only:**

**Ms Julie Lang** (00696);

The Local Development Plan seeks to establish the principle of development within this area, and while the prospective developers have submitted an indicative scheme which shows how the area might be developed, the detailed proposals have yet to be established. The area for the proposed allocation is sufficiently large and the options for layout of any development are likely to be flexible enough to ensure that neighbouring properties privacy and amenity can be safeguarded at acceptable levels, without resorting to high fencing, loss of daylight or unacceptable overlooking. Individual properties may have their views of particular features affected by the development, but loss of view is not a material planning consideration.

### **Lack of publicity and consultation on the proposals**

#### **H2001 only:**

**Mrs Ruth O'Keeffe** (01840);

#### **H2002 only:**

**Mr Edmund English** (01839)

The Council consulted on the proposals at Geilston Farm and Kirkton Farm at the Main Issues Report stage and at the current Proposed Local Development Plan stage of the process. Details of the publicity and consultation arrangements were given in the Development Plan scheme which the council has published annually, since the start of the process.

### **Effect on Tourism**

#### **H2002 only:**

**Ms Rhoda Faye Preston** (02061);

The Council considers that the A82 forms the main tourist access route to the area. Access via Cardross requires to be taken through Dumbarton and is not as well signposted. In terms of visitor attractions, Geilston Garden is the main draw for Cardross, this is only open between March and October and its operators the National Trust for Scotland advise that visitor numbers are low (see production xxxx). Geilston Gardens are set within a relatively self-contained landscape and while the Geilston Farm site is located opposite the entrance to them the proposed allocation at Kirkton Farm (H2002) will have little effect on them or their setting.

### **Conclusion**

Cardross is considered to be a Key Settlement in Argyll and Bute with a population in excess of 2,000 people with a range of essential services and on a public transport corridor for buses, active travel, road and rail that connects this village community with Helensburgh and the likes of Dunbarton.

The Council has considered carefully the representations duly made by all of the Objectors. While the Council can fully understand the concerns raised over the proposed changes to the green belt boundary to accommodate the two Allocations for 300 houses the Council can see

no compelling argument why either of the sites should be modified or indeed deleted from the LDP.

The Council considers that the projected decline in total population is a real threat to the viability of the area (including Helensburgh and Lomond) with a potential to adversely impact on the economy/wealth creation, workforce availability and efficient service delivery. The overall objective of the Council's Single Outcome Agreement/Community Plan (SOA) (Core Doc Ref. xxx) that has been approved by the Scottish Government for the 10 years to 2023 is "Argyll and Bute's economic success is built on a growing population." (see page 12 of the SOA). This outcome is in turn entirely supportive of the 6 national policy priorities set out in the national guidance on community planning and will also see Argyll and Bute contribute to the national outcomes for Scotland. The LDP can assist this overall outcome in a number of ways including providing for a generous supply of land for new housing sites in places where people want to live.

Cardross and its neighbouring communities have real potential for growth to assist in meeting the overall objective of the SOA. The lack of available land to allow the building of new housing at a larger scale has been a significant factor in the current population decline and this LDP proposes to tackle this by having sufficient housing allocations to meet our housing needs including affordable and contribute to retaining and growing our population to help maintain essential services within the town.

Consequently, the Council considers that the Allocations as proposed H2001 and H2002 represent a logical extension to the village that has been informed by the landscape capacity study and studies undertaken by the potential developers of the sites in question. The proposed Allocations will help to deliver much needed new housing, including 25% affordable units, within the plan period to meet the Argyll and Bute Housing Need and Demand Assessment requirements for the Helensburgh and Lomond area. As the objectors have not put forward any credible alternative to these sites or justified their site specific objections with additional evidence, the Council considers both Allocations to be effective sites, supported by major housing developers and consequently, for the reasons set out above, the Council considers that H2001 and H2002 should be retained within the proposed LDP with no modifications.

**Reporter's conclusions:**

**Reporter's recommendations:**

<b>ISS108</b>	Housing Allocation: Helensburgh Golf Club	
<b>Development plan reference:</b>	H2004 - Helensburgh East Helensburgh Golf Club	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p><b>Mr J McCarthy (01679);</b>  <b>Ms Sarah O'Donnell (01733);</b>  <b>Helensburgh Green Belt Group (00167);</b>  <b>Sportscotland (01864);</b>  <b>Boo Bennett (01916);</b>  <b>Mr Callum McNicol (02043);</b>  <b>Mr And Mrs S C And S J Milton (02045);</b>  <b>Mr David McCarthy (01667);</b>  <b>Ms Fiona Baker (01895);</b>  <b>Mr Keith Shipman (02120):</b></p>		
<b>Provision of the development plan to which the issue relates:</b>		
<b>Planning authority's summary of the representation(s):</b>		
<p><b>H2004 - Mr J McCarthy (01679);</b></p> <ol style="list-style-type: none"> <li>1. Erosion of area designated as Green Belt zone. The Golf Course serves as a buffer zone between housing and uncultivated country side and provides a very good amenity.</li> <li>2. The north east corner of the proposed site is a mature wooded area providing a wild life habitat. The development will have a direct/indirect impact on wild life in these woods and surrounding areas.</li> <li>3. Current surface water drainage is inadequate to cope with heavy rainfall and results in excessive surface water and flooding in Churchill and Glade Estates, and East King Street and will be made worse during construction if not properly considered during design phase.</li> <li>5. There is little provision for public amenities within existing adjacent housing areas. To add a further 300 units can only exacerbate and will result in considerable movement of persons to/from these areas. Hence traffic increase along with associated noise.</li> <li>6. East Abercromby Street is a busy road particularly at peak periods. Traffic volumes will increase, resulting in excessive wear/damage to road surfaces. Additionally its junction with Easterhill Road is poor with substandard visibility, higher traffic levels will increase in the possibility of traffic accidents at this junction.</li> </ol> <p><b>H2004 - Ms Sarah O'Donnell (01733);</b></p> <p>There are established trees along the golf course boundary providing a wildlife habitat will these be retained by the developers? The Golf Course was considered to be part of the Green Belt in 1970. This was one of the reasons for buying the property. I understand the need and demand for new housing but feel Helensburgh is gradually losing its hillsides.</p> <p><b>H2004 - Helensburgh Green Belt Group (00167)</b></p> <p>Proposed Green Belt land-take from the golf course (H2004) is huge. At 300 houses, it is the largest proposed allocation in the Helensburgh and Lomond Area. It needs to be considered,</p>		

in the context of overall excessive housing allocations for Helensburgh, alternative in town housing sites and large current availability in the town. The current housing proposals are incompatible with Scottish Planning Policy paragraphs 80 and 159.

**H2004 - sportscotland (01864)**

The Objector contends that the proposed housing allocation will significantly reduce the size of the existing golf club. However it is known that this allocation is supported by the Golf Club who is well aware of the potential implications for the club.

SportScotland is a statutory consultee and would expect to be consulted if a planning application was forthcoming for the above site. While not objecting to the allocation we would require any application to make provision for replacement facilities to be provided before development commences to ensure that the playing capacity or operation of the golf course is not reduced or detrimentally affected during the development of the site.

**H2004 - Boo Bennett (01916)**

The Objector contends that this 300 home incursion into Green Belt land is excessive and unnecessary. Sustaining the good amount of green land that lies within the borough is vital to the quality of life in Helensburgh.

This development will not secure the much needed regeneration of Helensburgh town centre, it will just make a less green place.

There is no need for this housing on Green Belt land particularly when the future of Faslane and associated employment are unknown.

**H2004 - Mr Callum McNicol (02043)**

I object to this proposal because the land upon which the housing would be built is fundamentally green belt land, albeit owned by Helensburgh Golf Club, who have made several attempts to sell this land in order to continue as an entity. It's no secret that the club is financially imperilled and requires revenue to develop a contingency expansion plan, including building a new clubhouse. I object to the Council basically agreeing that a sports organisation – whose boundaries impact so many private properties - can auction off this land to suit the needs of a council being squeezed to find alternative housing zonings, when alternative housing zones already exist within the area but have not been exploited. Paragraph 159 of the new SPP gives the purposes of Green Belts which are to: direct planned growth to the most appropriate locations and support regeneration, protect and enhance the quality, character, landscape setting and identity of towns and cities, and protect and give access to open space within and around towns and cities.

This proposal clearly fails most of the above objectives, not least that 300 houses - of which 25% are to be 'affordable' - will desecrate what is natural parkland and deny access to that landscape. The 'affordable' element is ludicrous when you consider the eventual occupants will be 1.5 miles from local amenity and that there is no public transport link to this location currently.

It also says that Green Belt designation should provide clarity and certainty on where development will and will not take place. The Golf club land is an open sore that won't go away it seems, until they have a new facility and the council gets a new housing estate built. The other important paragraph is 163 which lists the types of development which ARE suitable in a Green Belt, such as : woodland and forestry, including community woodlands, recreational uses that are compatible with an agricultural or natural setting.

Clearly, selling off a vast tract of the golf club - whose boundaries impact so many private properties - is not compatible with the above SPP provision. It's no secret in Helensburgh that

H2004 makes for a cosy win-win for the Golf Club, a housing contractor/developer and of course the Council. The only people to lose are those who through no fault of their own, will lose most of what it is that made them want to live there in the first place.

**H2004 - Mr And Mrs S C And S J Milton (02045)**

The proposed change of area H2004 Helensburgh Golf course from Green Belt to Housing for 300 units. We do not see a requirement for this number of new houses in Helensburgh. The town is not growing and has a large number of unsold houses. There are other areas within Helensburgh detailed in the Local Development Plan which provide sufficient housing growth capacity without encroaching on Green Belt. Note, An earlier plans to develop a smaller area within H2004 was previously rejected. In 10 years time once the uncertainty over Scottish independence has passed and the long term plan for the Naval Base at Faslane is known there may then be a requirement for additional housing.

Local Development Plan - Interim Environmental Report. Helensburgh East:  
Helensburgh Golf Club H 2004

Impact on Drainage and Flooding: Any proposed development on H2004 must have a detailed Drainage Impact Assessment (DIA). The interim Environmental Report indicates that there would be no significant affect on flooding from 300 houses.

It is normal practice to put surface water and drainage from roofs and roadways into natural watercourses. Any development at the western end of the proposed H 2004 site would inevitably drain into the small burn which runs downhill between Sannox Place and Machrie Drive. Recent drainage improvement conducted by Helensburgh Golf Course (HGC) has resulted in accelerated erosion of the banks and undermining of the retaining wall foundations on the east side of the burn. Any future housing development in this area would lead to the burn water flow rapidly responding to rain and the resultant "Flood Pulse" causing failure of the retaining walls. If this were to happen local blockage of the burn would result in damage to the garden at 2 Sannox Place, but more seriously possible subsidence of the properties in Machrie Drive.

Any proposed development on this site must consider the effect on the watercourse and the properties downstream. There could be a similar impact on the smaller watercourse which runs down the east side of Old Luss Road (ROW) which runs through the centre of site H2004

Local Development Plan - Interim Environmental Report. Helensburgh East:  
Helensburgh Golf Club H 2004

The Interim Report assessment for against "Would development of the allocation significantly affect an area of known value for recreation, amenity, outdoor access or community value?" was assessed at ? with a comment "Golf course to be extended to north to compensate for area lost to housing. Need for ROW to be protected." .The only area to the north is virgin Green belt . If the site H2004 was designated as an area for housing and subsequent planning application approved the golf club would have to build fairways and possibly the new, pro-shop and clubhouse on this virgin Green Belt.

**H2004 - Mr David McCarthy (01667)**

The objector contends that as a house owner to 14 Machrie Drive, Helensburgh , I object to proposed Local Development Plans to Helensburgh East Helensburgh Golf Club, Site ref H2004 , because –

1. Loss of value to my property if development plans were to successfully proceed
2. Loss of Helensburgh Golf Club green belt land immediately behind my property would mean loss of privacy and loss of pleasant views
3. If housing was built on proposed development plan my property would be under serious

threat from flooding without proper drainage.

4. Local existing drainage system unable to cope with extra housing.
5. Local road system unable to take increased traffic volume to proposed development.
6. No nearby shopping infrastructure would only increase pedestrian and road traffic on local roads.
7. Pavements unsuitable at present time for pedestrians and with increased use can only get worse.
8. No loss of woodland as direct result of consequence to development

**H2004 - Ms Fiona Baker (01895)**

Helensburgh – building 300 houses on and adjacent to the golf course! Totally unacceptable to destroy the town's golf course.

**H2004 - Mr Keith Shipman (02120)**

- 1) The site is an important open space and recreational site. Except in the case of closure of the club an alternative green site would have to be found.
- 2) Adequate provision for social housing has been made on the old Academy site.
- 3) The infrastructure and amenities of the area will not sustain a development of this size.
- 4) The road junctions at the west end of East Abercrombie Street and the southern end of Charlotte Street would provide a danger for the additional 600 plus cars using the junctions.
- 5) Helensburgh schools are already at capacity without the additional naval personnel moving to the area being taken into account
- 6) There is no evidence the current housing stock is insufficient, the number of 'for sale' properties evidences this. Indeed the policy's own projections are for a continuing decline in the Helensburgh population. The council's desire to increase housing flies in the face of this evidence.
- 7) The proposal is contrary to the sustainability and environmental protection policy.

**Modifications sought by those submitting representations:**

**H2004 - Mr J McCarthy (01679)**

Remove the development site proposal from the Plan. Should the Golf Club wish to dispose of these lands, to then designate this area for sports and recreational purposes.

No housing to be proposed on Green Belt but if must be developed then limited density in keeping with surrounding areas. Serious consideration to be given to the upgrade of drainage and traffic management.

**H2004 - Ms Sarah O'Donnell (01733)**

My objection would be removed when assurance is given that established forests are preserved and that any future developments will include provision of adequate green spaces and play areas.

**H2004 - Helensburgh Green Belt Group (00167)**

Reduce the housing allocation for H2004, but in the context of overall housing for Helensburgh and Lomond.

**H2004 - sportscotland (01864)**

The policy allocation for this site should make reference to the need to provide replacement facilities prior to the development of the existing golf course in accordance with paragraph 156 of the SPP.

**H2004 - Boo Bennett (01916)**

Withdraw this planned development area or drastically reduce the number of proposed new homes.

**H2004 - Mr Callum McNicol (02043)**

That H2004 be withdrawn or vetoed. There is already an approved application for Dunbritton Homes on ground already sold by Helensburgh Golf Club near to Kent Drive; this scale of development, while regrettable, should be the only one allowed at this location.

**H2004 - Mr And Mrs S C And S J Milton (02045)**

None stated

**H2004 - Mr David McCarthy (01667)**

Stop this Local Development Plan – Call a halt to any future building proposals on Site ref H2004

**H2004 - Ms Fiona Baker (01895)**

Remove entirely housing proposals for East Sawmill field at Colgrain (H2005) and on Helensburgh Golf Club

**H2004 - Mr Keith Shipman (02120)**

Remove the item in the plan

**Summary of responses (including reasons) by planning authority:**

**H2004 - Mr J McCarthy (01679), H2004 - Ms Sarah O'Donnell (01733), H2004 - Helensburgh Green Belt Group (00167), H2004 - Boo Bennett (01916), H2004 - Mr Callum McNicol (02043), H2004 - Mr And Mrs S C And S J Milton (02045), H2004 - Mr Keith Shipman (02120):**

The Housing Need and Demand Assessment (see Core Document ref **xxxx**) has indicated that there is a need for over 1,200 new homes over a ten year period in Helensburgh and Lomond. The Housing Land Audit (see Core Document ref **xxxx**) establishes that there is currently a potential 727 units available from existing allocations, potential development areas, and windfall sites within the Helensburgh and Lomond Housing Market Area. There is therefore a need to release Greenbelt land in order to provide for the established local housing needs of the area. The Green Belt Landscape Study (see Core Document **xxxx**) provides an assessment of the landscapes of the Green Belt and the contribution which they make to the Green Belt objectives as outlined in para 159 of Scottish Planning Policy ( see Core Document ref **xxxx**).

The landscape study included a detailed assessment of a variety of potential sites around the Helensburgh area including the Golf Course site, and concluded that it had weak landscape boundaries, that existing planting contiguous with the Blackhill Plantation and the 100 metre contour could be reinforced with additional planting to create a new boundary, and that in terms of landscape objectives of the Green Belt it made the lowest contribution of the



assessed sites. This accords with the findings of the Reporters at the 2009 local plan inquiry who concluded that the golf course would be suitable for release should the housing land supply figures require it. (see Core Document ref xxxx).

**H2004 - Mr J McCarthy (01679), H2004 - Ms Sarah O'Donnell (01733), H2004 - Helensburgh Green Belt Group (00167)**

The proposed allocation extends to 14 hectares, the heavily managed and used greens and fairways comprise around four fifths of this, and are considered to be of relatively little wildlife interest. The wooded areas and boundaries are likely to be of greater interest to wildlife and comprise a relatively small proportion of the allocation. The Local Development Plan policy is to seek to retain trees and woodland wherever possible, and the development brief in the Draft Action Programme (see Core Document xxxx) which accompanies the Local Development Plan highlights the need to retain these. The brief also indicates landscaping and open space provision will be required as part of the proposed development, and this can give the opportunity to enhance biodiversity as a result of the development.

**H2004 - Mr J McCarthy (01679), H2004 - Mr And Mrs S C And S J Milton (02045), H2004 - Mr David McCarthy (01667)**

In relation to concerns about increased flood risk the potential developers for this proposed Allocation will be required to submit a Drainage Impact Assessment, and to include designs for a sustainable urban drainage scheme which will ensure that there will be no increase in run off and consequent risk of flooding as a result of any development. This will be dealt with as part of any detailed planning application. It should be noted that SEPA have not objected to the inclusion of this site in the plan.

**H2004 - Mr J McCarthy (01679), H2004 - Mr David McCarthy (01667), H2004 - Mr Keith Shipman (02120)**

The area road engineer has raised no concerns in relation to the traffic associated with this proposed development; the impact of which will be partly offset by the reduction of traffic using the local road network to access the golf course, clubhouse and associated facilities. Similarly, the road engineer had raised no concerns regarding pedestrian access to the site, the detail of which can be addressed as part of the detailed planning application process.

**H2004 - Sportscotland (01864), H2004 - Ms Fiona Baker (01895), H2004 - Mr Keith Shipman (02120)**

The identification of part of the golf course as a housing allocation has come about as a result of sustained representation from the Golf Club. The club has stated its intention to develop replacement holes/fairways together with a new clubhouse and associated facilities further north with access taken from Blackhill. The development of this site will consequently help the sustainability of this important recreational facility in the town.

**H2004 - Boo Bennett (01916)**

The Council accepts that the regeneration of Helensburgh town centre will be best secured by the adoption of a town centre first approach as advocated in SPP for a wide range of uses, and in particular those uses such as retailing, offices, and commercial leisure which attract large volumes of users. This approach is enshrined in the current Adopted Local Plan Policy and that of the Proposed Local Development Plan. Housing development can have a role to play in this, however the opportunities for town centre housing development have been curtailed, as a result of the local communities response to the recent consultation exercise on Helensburgh Pier Head Masterplan, whose modest proposals for town centre residential

development where overwhelmingly rejected by the community (see production ref xxxx and xxxx) There are no other larger scale development sites for housing that are available for development and as such the Council has to look to greenfield release of the settlement edge/Green Belt in order to accommodate the numbers required to meet our housing needs.

**H2004 - Mr Callum McNicol (02043)**

The need for affordable housing in Helensburgh has been clearly established in the Housing Need and Demand Assessment (Core document ref xxxx). Scottish Planning Policy (Core document ref xxxx) Paragraph 88 encourages Local Development Plans to seek the integration of affordable housing in all new housing developments wherever such a need has been demonstrated. The benchmark figure being that each site should contribute 25% of the total number of housing units as affordable housing.

**H2004 - Mr David McCarthy (01667)**

The development brief which accompanies this Allocation in the Draft Action Programme (core document ref xxxx) seeks the retention of existing boundary trees, the site is large and the detail of orientation of proposed houses, separation from existing houses, can appropriately be dealt with at the detailed planning application stage to ensure acceptable levels of privacy between existing and proposed houses. The loss of view and / or value of property is not a relevant material planning consideration however the Council always endeavours to minimise the impact on residential amenity wherever it can.

**H2004 - Mr Keith Shipman (02120)**

The long term population projections for Argyll and Bute (including Helensburgh) show an aging and declining population. Many of the schools across the Councils area have excess capacity. While there may be a number of primary schools in Helensburgh and the Hermitage Academy which are approaching their capacity currently, this may change in future years if the population trend of decline is not arrested. There are many factors which can influence demand for school places, with availability of new housing being only one of these, if additional school accommodation is required, then the council as education authority will address these.

**H2004 - Mr Keith Shipman (02120)**

No evidence has been submitted by the objector to support this assertion that the proposed development of this area would be contrary to sustainability and environmental protection policy. The proposed Allocation does not affect any identified protected environmental features, and as it is located on the edge of a main settlement in walking distance of a wide range of key community facilities, public transport options and services which a Main Town, such as Helensburgh provides is considered to be in a sustainable location.

**H2004 - Mr Keith Shipman (02120)**

As part of the development proposals the developers will require to upgrade infrastructure, and improve or provide new amenities, should these be required to support the development.

**Conclusion**

The need for additional land for housing has been clearly identified in the Argyll and Bute Housing Need and Demand Assessment (see Core Document Ref xxxx). This was included as an issue in the Main Issues Report (MIR) (Core Document Ref xxxx) for the Local Development Plan. Analysis of the representations received in response to the MIR indicated

that Argyll and Bute Council should try to identify a supply of land to meet all of the housing requirements in the Housing Need and Demand Assessment (see Core Document Ref xxxx) wherever practicable for each of the 9 housing market areas. This approach is further reinforced by analysis of the Council's Housing Land Audit (see Core Document xxxx), and also the latest census results which indicate a 6.8% reduction in population in the Helensburgh and Lomond area, where markedly, the application of the Green Belt, and the resultant constrained supply of housing land, can be contrasted with a 6% increase in population in the Oban and Lorn area, where there is a more generous supply of housing land allocations; including the development of the Dunbeg Corridor together with numerous opportunities for small scale development in the surrounding countryside.

None of the objectors objected to the site at the Main Issues (MIR) Stage of the LDP nor have they provided any alternative sites that can accommodate the numbers identified for H2004.

The Council considers that the projected decline in total population is a real threat to the viability of the area (including Helensburgh and Lomond that has experienced the sharpest falls in population) with a potential to adversely impact on the economy/wealth creation, workforce availability and efficient service delivery. The overall objective of the Council's Single Outcome Agreement/Community Plan (SOA) (Core Doc Ref. xxx) that has been approved by the Scottish Government for the 10 years to 2023 is "Argyll and Bute's economic success is built on a growing population." (see page 12 of the SOA). This outcome is in turn entirely supportive of the 6 national policy priorities set out in the national guidance on community planning and will also see Argyll and Bute contribute to the national outcomes for Scotland. The LDP can assist this overall outcome in a number of ways including providing for a generous supply of land for new housing sites in places where people want to live.

Helensburgh and its neighbouring communities have real potential for growth to assist in meeting the overall objective of the SOA. The lack of available land to allow the building of new housing at a larger scale has been a significant factor in the current population decline and this LDP proposes to tackle this by having sufficient, effective housing allocations to meet our housing needs and contribute to retaining and growing our population.

The location of these allocations have also been guided by a landscape capacity study (Core doc. Ref, xxxx) and are supported by private developers who responded for a call for sites to inform the contents of the Main Issues Report (MIR) and then the proposed LDP.

Taking all of the above into account the Council recommends that this site be retained in the Proposed LDP with no modifications.

**Reporter's conclusions:**

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**Reporter's recommendations:**

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<b>ISS109</b>	<b>Housing Allocation: Sawmill Field</b>	
<b>Development plan reference:</b>	H2005 - Helensburgh East Sawmill Field, Cardross Road	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p><b>Dr And Mrs H And P M Thompson (01700);</b>  <b>Scottish Natural Heritage (01587);</b>  <b>CALA Homes (West) (01870);</b>  <b>Boo Bennett (01916);</b>  <b>Ms Sarah Brown (01956);</b>  <b>Mr David B Price (02063);</b>  <b>Ms Fiona Baker (01895):</b></p>		
<b>Provision of the development plan to which the issue relates:</b>		
<b>Planning authority's summary of the representation(s):</b>		
<p><b>Dr And Mrs H And P M Thompson (01700) - H2005</b></p> <p>The Red Burn is the natural boundary to the east of Helensburgh. A housing Allocation for 145 units on productive agricultural land in the parish of Cardross is a mistake. The proposed development would be as close to Cardross as it would be to the centre of Helensburgh.</p> <p>We are also extremely concerned that this site was identified at the initial stage of the LDP process "which included community engagement" and consultation with developers. As the only family living adjacent to the site we are obviously stakeholders but were never consulted. The lands of Mill House were part of the Sawmill Field, why were they not included. Why was no thought given to the amenity value of our woodland to the east? Did the planning officials just draw a line around the field at the behest of the owner/developer with no consideration for the wider picture?</p> <p><b>Scottish Natural Heritage (01587) - H2005</b></p> <p>Allocation is close to Inner Clyde Special Protection Area (SPA) and so requires assessment as part of the Habitats Regulations Appraisal (HRA) of this plan.</p> <p><b>CALA Homes (West) (01870) - H2005</b></p> <p>This Representation relates to proposed housing allocation H2005: Helensburgh East – Sawmill Field, Cardross Road. The merits of allocating this site (Ref: H2005) for development are set out in the Development Framework Report which supports this Representation. The site extends to 5.8 hectares and is under the control of CALA Homes (West). It can accommodate up to 145 homes, including affordable housing. The site is effective in accord with PAN 2/2010 and can be delivered in the initial Plan period. There is no harm to Greenbelt objectives from the release of this site. Its development provides a logical extension to the town, with existing robust boundaries for the settlement and the Greenbelt. The Interim Environmental Report (February 2013) assesses the proposed allocations and the Council has determined that this allocation(Ref: H2005) will</p>		

have a likely neutral effect. The analysis carried out by CALA Homes (West) supports this assessment of the site and its conclusions. CALA Homes (West) supports the Council's allocation of this site, helping meet its housing land requirement and maintain a 5 years' effective land supply at all times.

**Boo Bennett (01916) - H2005**

This 145 home incursion into Green Belt land is excessive and unnecessary.

Sustaining the good amount of green land that lies within the borough is vital to the quality of life in Helensburgh.

This development will not help the regeneration of Helensburgh town centre, it will just make a less green place.

This plan seems to have more to do with politics and increasing the Council's share of government funding than any real need for this housing on Green Belt land.

The amount of housing is also being proposed when the future of Faslane and associated employment are unknown.

The recent Waitrose decision surely opens the door for more town centre housing, which would help regeneration.

**Ms Sarah Brown (01956) - H2005**

Release for housing development is inappropriate and will lead to long term ribbon development between Helensburgh and Cardross. This area is Greenbelt and is important in supporting the open space network in the area. It backs onto locally important woodlands and is very close to the internationally recognised Ramsar site down on the shore near Ardardan. Its release for housing development would also increase traffic, and the risk of accidents as people turn on and off the Cardross road. It will also break the line of Helensburgh's outline from the sea and have a disproportionate effect on views of the town. I am not adverse to development, filling in gaps at the back of the town, e.g. the field behind H2007, would be much more effective and would have many benefits from a services point of view.

**Mr David B Price (02063) - H2005**

This area of ground Ref: H2005 is the most logical extension to local housing in view of the land available because of restrictions caused by the West Highland Railway to the North East of Helensburgh.

**Ms Fiona Baker (01895) - H2005**

Helensburgh – Colgrain Site Ref H2005 for 145 houses on greenbelt agricultural land would not only contravene several policies of the LDP it would be urban sprawl ribbon development extending the boundary of Helensburgh.

I object very strongly to this proposal to the detriment of Helensburgh. This is a major not a minor adjustment to the Greenbelt.

**Modifications sought by those submitting representations:**

**Dr And Mrs H And P M Thompson (01700) - H2005**

Reject the application or conduct reasonable discussions with adjacent land owners.

**Scottish Natural Heritage (01587) - H2005**

Satisfactory conclusion of HRA of this plan.

**CALA Homes (West) (01870) - H2005**

None - support

**Boo Bennett (01916) - H2005**

Withdraw this planned development area or drastically reduce the number of proposed new homes.

**Ms Sarah Brown (01956) - H2005**

I would like to see H2005 removed from the proposed development areas and the field behind H2007 used instead.

**Mr David B Price (02063) - H2005**

None - support

**Ms Fiona Baker (01895) - H2005**

Remove entirely housing proposals for East Sawmill field at Colgrain (H2005)

**Summary of responses (including reasons) by planning authority:**

**Dr And Mrs H And P M Thompson (01700), Boo Bennett (01916) - H2005, Ms Sarah Brown (01956) - H2005, Ms Fiona Baker (01895) - H2005**

The need for additional land for housing has been clearly identified in the Argyll and Bute Housing Need and Demand Assessment (see Core Document Ref **xxxx**). This was included as an issue in the Main Issues Report (MIR) (Core Document Ref **xxxx**) for the Local Development Plan. Analysis of the representations received in response to the MIR indicated that Argyll and Bute Council should try to identify a supply of land to meet all of the housing requirements in the Housing Need and Demand Assessment (see Core Document Ref **xxxx**) wherever practicable for each of the 9 housing market areas. This approach is further reinforced by analysis of the Council's Housing Land Audit (see Core Document **xxxx**), and also the latest census results which indicate a 6.8% reduction in population in the Helensburgh and Lomond area, where markedly, the application of the Green Belt, and the resultant constrained supply of housing land, can be contrasted with a 6% increase in population in the Oban and Lorn area, where there is a more generous supply of housing land allocations; including the development of the Dunbeg Corridor together with numerous opportunities for small scale development in the surrounding countryside.

None of the objectors objected to the site at the Main Issues Stage of the LDP. Only one of the objectors has put forward an alternative site to make up the housing land shortfall that would result on account of this site being omitted from the LDP as proposed. The alternative site put forward by Ms Sarah Brown (01956) is considered not to be effective by the Council at this time and as such has not been included the SEA (Core Document Ref **xxxx**).

The decision to include the Sawmill site within the proposed LDP was taken after due consideration of the findings of the published Green Belt Landscape Capacity Study (Core Document Ref xxxx) that identifies this area located on the eastern edge of the town, surrounded by the old policy woodlands of Camis Eskan as having a well-defined and defensible boundary features with moderate to low scenic quality and moderate landscape sensitivity. Consequently, the Council rejects the objector's opinion that the development of this site represents "urban sprawl and ribbon development" as the site will occupy a self-contained area bounded by the new school to the east, the A814 with new retail and allocated site for business and industry purposes beyond and the policy woodlands of Camis Eskan to the west (see Production ref xxxx).

The site while accepted by the Council as being highly visible given its position on a main entrance route to the town of Helensburgh is considered to be of moderate to low scenic quality. In addition, this approach to the town has been significantly affected by the recent large scale development of the new Hermitage Academy and the new retail development (Waitrose) on the opposite side of the road together with the identified zoning for business and industry purposes at BI-AL 3/1. The proposed housing allocation provides an opportunity to create a more graduated transition, incorporating a new gateway feature, to the eastern approaches to the town.

The development of the site will also result in the former policy woodlands of Camis Eskan becoming a strong and highly defensible Green Belt boundary. In particular, the Council considers that these woodlands make, and will continue to make, a significant contribution to the visual amenity of the area and provide a strong and highly defensible landscape feature which will help contain the new development, prevent future coalescence and indeed the further possibility of ribbon development along the A814.

**Ms Sarah Brown (01956) - H2005**

The Council accepts that proposed development will result in additional traffic and turning movements onto and off the A814 Cardross Road. However, the Council's road engineers have raised no objections to the inclusion of the site within the plan and are confident that a new junction can be satisfactory provided on the site which allows for safe access and egress. In addition, the increase in volume of traffic as a result of this development is not considered significant in the context of the existing levels of use of this main road and the objector has not provided any evidence to counteract this opinion of the Council. The objector has provided no evidence to counter this opinion.

In terms of the alternative site (extension of H2007) as put forward by the objector. Possible alternative areas for new housing development to the rear of Helensburgh were included in the Main Issues Report which was produced as an initial stage the in Local Development Plan preparation process. The area at Drumfork Farm was included as one of the options at this stage. However, this area is more extensive than the Sawmill Field, and it has no natural feature which would enable a strong green belt boundary to be established. Its upper slopes would also result in more significant detrimental landscape impacts across a wider area. In terms of access and servicing, this area is some distance from the main road network and is more remote from rail, cycle and other public transport routes. The Sawmill Field site is therefore considered to be a more appropriate site both in landscape terms, and in relation to ease of access and servicing, and overall ease of development as demonstrated by the active interest and support of a developer (CALA Homes (West) (01870) for this site.

**CALA Homes (West) (01870) - H2005, Mr David B Price (02063) - H2005**

Support noted and welcomed.

## Scottish Natural Heritage (01587) - H2005

The Council is undertaking a HRA to address this issue.

### **Conclusion**

The Council considers that the projected decline in total population is a real threat to the viability of the area (including Helensburgh and Lomond) with a potential to adversely impact on the economy/wealth creation, workforce availability and efficient service delivery. The overall objective of the Council's Single Outcome Agreement/Community Plan (SOA) (Core Doc Ref. xxx) that has been approved by the Scottish Government for the 10 years to 2023 is "Argyll and Bute's economic success is built on a growing population." (see page 12 of the SOA). This outcome is in turn entirely supportive of the 6 national policy priorities set out in the national guidance on community planning and will also see Argyll and Bute contribute to the national outcomes for Scotland. The LDP can assist this overall outcome in a number of ways including providing for a generous supply of land for new housing sites in places where people want to live.

Helensburgh and its neighbouring communities have real potential for growth to assist in meeting the overall objective of the SOA. The lack of available land to allow the building of new housing at a larger scale has been a significant factor in the current population decline and this LDP proposes to tackle this by having sufficient housing allocations to meet our housing needs including affordable and contribute to retaining and growing our population to help maintain essential services within the town.

Consequently, the Council considers that the Allocation as proposed H2005 represents a logical extension to the town that once completed will provide a robust green belt boundary and help to deliver much needed new housing, including 25% affordable units, within the plan period to meet the Argyll and Bute Housing Need and Demand Assessment requirements for the Helensburgh and Lomond area. As the objectors have not put forward any credible alternative to this site or justified their site specific objections with additional evidence, the Council considers the Sawmill site to be an effective site and consequently for the reasons as set out above the site should be retained within the proposed LDP with no modifications.

### **Reporter's conclusions:**

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### **Reporter's recommendations:**

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<b>ISS110</b>	<b>Settlement and Spatial Strategy – Helensburgh and Lomond</b>	
<b>Development plan reference:</b>	<b>Settlement and Spatial Strategy – Helensburgh and Lomond</b>	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<b>Mr Norman Rodger (Helensburgh Green Belt Group) (00167);  Mr Alastair MacBeth (Helensburgh Study Group) (00166);  Mr Nigel Millar (Helensburgh Community Council) (00135);  Ms Kathleen Siddle (Helensburgh Community Woodlands Group) (01766);  Mr Murdo MacDonald (Rosneath Peninsula West Community Development Trust) (01257):</b>		
<b>Provision of the development plan to which the issue relates:</b>	<b>Settlement and Spatial Strategy – Helensburgh and Lomond</b>	
<b>Planning authority’s summary of the representation(s):</b>		
<b>Mr Norman Rodger (Helensburgh Green Belt Group) (00167);</b>  Objections to the content of paragraphs 2.3.1 and 2.3.2 of the Written Statement. Helensburgh is a non-industrial but residential quasi-suburb of Glasgow in an Exceptional, south facing setting, with countryside paths, woodlands and visual amenity which play an important part in the success of the town. Its Green Belt serves the purposes given in paragraph 159 of the Scottish Planning Policy, not only in giving access to this valuable countryside, but in ensuring that planned growth is directed to "the most appropriate locations" and supports regeneration.  The Objector contends that the Proposed Local Development Plan, to a degree, puts these advantages at risk and, in particular, fails to "direct planned growth to the most appropriate locations".  The Objector is also concerned that the words "relative accessibility to the adjacent Glasgow conurbation" underplay the close links with Dumbarton and Glasgow;  The Objector is concerned that the word "pressures" in the second line of section 2.3.1 appears negative, so we suggest use of a more neutral term such as "issues";  The Objector is concerned that the suggestion that Helensburgh's potential needs to be unlocked neglects the high level of its success.  The Objector is concerned that the assertion contained within the plan that Helensburgh needs "sustainable economic growth" both ignores its current stability and may be a preliminary excuse to impose an extreme degree of population expansion implied in the housing allocations, but not justified in the text.  The Objector is concerned that problems experienced by other parts of A&B are being ascribed to Helensburgh. In particular, the sixth bullet point in section 2.2.3 should be divided into two distinct issues: green countryside and renewable energy and that the renewable energy point should be cautious about wind turbines, while encouraging less conspicuous renewables. In addition the sixth bullet point should seek to enhance further “the outstanding countryside setting of the Helensburgh, its exceptional existing footpaths network, its community woodlands, its green network and its important Greenbelt”.		

Paragraph 2.3.2 of the LDP Written Statement consequently, in the opinion of the Objector, fails to provide an adequate vision for the future of Helensburgh.

**Mr Alastair MacBeth (Helensburgh Study Group) (00166);**

The Objector contends that paragraph 2.3.1 is inadequate and misleading. The distinction between the Helensburgh Corridor and the Rosneath Peninsular needs to be made clearer. The phrase "relative accessibility to the adjacent Glasgow conurbation" is a serious understatement concealing the reality that Helensburgh was created as and remains as a quasi-residential suburb of Glasgow.

**Mr Nigel Millar (Helensburgh Community Council) (00135):**

The Objector contends that the (bullet point) list at Paragraph 2.3.2 does not adequately reflect or build on Helensburgh's reason to exist as an attractive, residential town and as a quasi-suburb of Greater Glasgow. Its local economy is largely geared to meeting the needs of its local residents and for the first time in over 40 years there a number of major development initiatives planned for the town. It is all of these which need to be reflected here.

**Ms Kathleen Siddle (Helensburgh Community Woodlands Group) (01766);**

The Objector contends that the Council plans that by "2024, Helensburgh and Lomond will be: (3rd bullet point) a place of outstanding natural and built heritage with enhanced natural assets, better townscape and public realm with new community facilities such as the Helensburgh Pierhead Swimming Pool and Leisure Centre together with a refurbished East Clyde Street Centre ". The above list contains named "community facilities". But does not give examples of "natural heritage with enhanced "natural assets".

The Objector also contends that the Council plans that by "2024, Helensburgh and Lomond will be: (6th bullet point) a greener place with numerous community led renewable energy projects, established community forests and green networks". The Objector contends that Helensburgh has and plans to have community woodlands, but not community forests.

**Mr Murdo MacDonald (Rosneath Peninsula West Community Development Trust) (01257):**

Expression of general support expressed for the Local Development Plan key policy themes which mirror the ambitions of the people in the Peninsula West local communities. The Trust supports the continuing commitment of the Council, through the Local Development Plan, to promoting and supporting renewable energy developments.

The Trust acknowledges that the number of children in their area, including Cove and Kilcreggan, reduced by 23% and adults of working age by 7% falling between 2001 and 2009, and are designated by the Plan as 'Key Rural Settlements', the Trust supports the view expressed in the plan in Paragraph 1.6.1 that sustainable long-term economic growth is needed 'to support the retention and growth of our population' through attention to services, the natural and built environment and quality-of-life. The Trust supports the recognition in the Local Development Plan that 'an effective land supply' will be required 'to accommodate new business and retail opportunities, homes, leisure facilities together with the necessary infrastructure and services required to support them.'

The Trust welcomes the intention to steer significant new developments to particular areas, including the local Key Rural Settlements in Paragraph 1.6.2 of the LDP Written Statement. The Trust also supports Key Objective C, and its stated intention that the Council will be

seeking 'to work in partnership with local communities in a way that recognises their particular needs to deliver successful and sustainable local regeneration;'

The Trust is disappointed however that the sections of the Local Development Plan dealing with Helensburgh and Lomond in Paragraph 2.3 of the LDP focuses largely on Helensburgh and its adjacent communities. Whilst those communities may be 'subject to different development pressures from the rest of Argyll & Bute' (Paragraph 2.3.1), the communities of the Rosneath Peninsula share the pressures experienced by smaller communities across the Council area.

This includes distance and relative inaccessibility from main population centres have contributed to features of decline on the Rosneath Peninsula in recent years, including: derelict public amenities; weak and costly transport links; very limited facilities for young people; an absence of local job opportunities; lack of affordable housing; lack of special needs housing for older people; closure of the Council library; the sale of former community centre and church hall; and environmental degradation.

**Modifications sought by those submitting representations:**

**Mr Norman Rodger (Helensburgh Green Belt Group) (00167);**

The Objector (agrees with the **Helensburgh Study Group (00166)**) and requests that Paragraphs 2.3.1 and 2.3.2 of the LDP Written Statement (page 10) are altered to provide a foundation for its *sic* (Helensburgh) future. In particular the Objector contends that the negative ascription of the Green Belt as a "pressure" replaced by a strong statement of its positive value based upon the purposes given in Scottish Planning Policy Paragraph 159.

**Mr Alastair MacBeth (Helensburgh Study Group) (00166);**

The Objector requests that the words "and superb countryside setting, footpaths and green tourism value." be added to the third bullet point.

The Objector requests that the word "offer" in the first line of the fourth bullet point be replaced with the words "continue to provide" and after the word choice add the words "as is already extensively available in the private sector, but with the addition of more affordable housing". Delete "with a focus on large scale growth"

The Objector contends that in the fifth bullet point the generalisations here could be misinterpreted or interpreted in different ways and it should be made clear that Helensburgh is not, and should not become, an industrialised town. In addition distinguishing between the Helensburgh corridor and Rosneath Peninsula would be helpful.

**Mr Nigel Millar (Helensburgh Community Council) (00135):**

The Objector requests the following changes to be made to Paragraph 2.3.2, the 3<sup>rd</sup> bullet point. The addition of the words "a revitalised Hermitage Park" after the word centre.

The deletion of the words "with a focus of larger scale growth in Helensburgh and Cardross delivered through the Greenbelt Masterplan" and its replacement with the words "on meeting identified housing needs and on growth delivered through existing sites, new identified sites and underused and brownfield sites" after the word focus in the fourth bullet point.

The addition of the words "surrounding countryside, recreational access to the River Clyde" after the word "Park" in the 5<sup>th</sup> bullet point.

The deletion of the 6<sup>th</sup> bullet point after the words “A greener place” and its replacement with the words “offering wide ranging, community led, small scale renewable energy projects, established community woodlands and green networks.”

**Ms Kathleen Siddle (Helensburgh Community Woodlands Group) (01766);**

The Objector requests that the words "and a network of community and amenity woodlands" be added to the 3<sup>rd</sup> bullet point Paragraph 2.3.2 and that the word "woodlands" be added to the words “forests” in the 6<sup>th</sup> bullet point.

**Mr Murdo MacDonald (Rosneath Peninsula West Community Development Trust) (01257):**

The Community Development Trust understands that the detailed housing proposals made in the draft Local Development Plan reflect the terms of the Argyll and Bute Mr Murdo MacDonald (Rosneath Peninsula West Community Development Trust) (01257):

The Community Development Trust understands that the detailed housing proposals made in the draft Local Development Plan reflect the terms of the Argyll and Bute Housing Needs and Demand Assessment (HNDA). However the Trust is aware of a very widely expressed need on the Rosneath Peninsula for both affordable housing for younger people and families, and for special needs accommodation for older people and people other age groups with particular needs. These housing developments are needed on the Rosneath Peninsula to address the population decline in children and families, which is a strategic and local issue recognised in many parts of the Local Development Plan. Housing is also required to address the needs of older people, who have no local access to special needs accommodation. Recognising the terms of the current HNDA, the Trust would want to see a commitment within the Local Development Plan to the Council working with the Trust on a new form of rural housing needs and demand assessment, which would assess the housing needs in of the Key Rural Settlements on the Rosneath Peninsula. Potential sites have been identified beyond the top of Church Road in Cove for affordable housing, and on Shore Road or Fort Road for special needs housing.

The Trust recognises that it is not possible to include very detailed local area analysis and project planning within a Local Development Plan for Argyll & Bute. However, within the section concerning Helensburgh and Lomond, the Trust would want to see recognition of the key importance of the Rosneath Peninsula West Community Action Plan, with its assessment of local needs, and its detailed project proposals to meet those needs, including: youth and recreation facilities; arts and culture events and festivals; employment, business and tourism resources and workshop space; transport development; environmental improvements to villages and foreshore; health and welfare supports and housing.

The Annex below provides a full listing of the priorities set out in the Community Action Plan, and these are described and can be accessed in greater detail on the Community Development Trust website: [http://www.rosneathpeninsulawest.com/?page\\_id=162](http://www.rosneathpeninsulawest.com/?page_id=162)

The Trust would therefore wish to see a specific commitment to partnership working between the Council and the Rosneath Peninsula West Community Development Trust to deliver all of the improvements laid out in the Community Action Plan, which are consistent with those of the Local Development Plan and relevant other council policies.

**Summary of responses (including reasons) by planning authority:**

**Mr Norman Rodger (Helensburgh Green Belt Group) (00167);**

The Council considers that in the context of the Local Development Plan it is right to refer to the different development “pressures” that exist in Helensburgh and Lomond given the close proximity to the Glasgow conurbation and the presence of the Green Belt. The use of the term is not meant to be negative and the Council can see no advantage of replacing the term with the word “issues”.

The Council agrees with the Objector that Helensburgh is a successful place which has been improved recently with public investment to its public realm through CHORD, the building of the new Hermitage Academy, new affordable housing at the Hermitage, the refurbishment of the former East Clyde Street Centre to form new council offices, an improved retail offer in the town centre and the outskirts of the town, and proposed revitalisation of the Pier to provide a new community leisure facility.

That said, despite a lower than the Scottish average unemployment rate, the area has a falling population (See production Doc. Ref xxx) and Helensburgh contains two datazones within the 15% most overall deprived datazones in Scotland according to the SIMD 2012.

According to SIMD 2012:

Datazone S01000767 is ranked 170 most overall deprived out of 6,505 datazones in Scotland, and is the most overall deprived datazone in Argyll and Bute. 36% of the population within this datazone were identified as being income deprived, and 34% of the working age population were identified as being employment deprived.

Datazone S01000770 was ranked 465 most overall deprived out of 6,505 datazones in Scotland. 32% of its population were income deprived. 28% of its population of working age were employment deprived.

These two datazones have been in the 15% most overall deprived datazones in Scotland in previous indices, published in 2004, 2006 and 2009.

In addition Rosneath a community that relies of the services and job opportunities that Helensburgh can offer also has a datazone that falls within the 20% of the most deprived datazones in Scotland.

Datazone S01000780 (Rosneath) is within the 20% most overall deprived datazones in Scotland, and was ranked 1,185 out of 6,505 in SIMD 2012. 20% of its population were income deprived; 22% of its working age population were employment deprived

These facts indicate that there is a need for sustainable economic growth in the community of Helensburgh and indeed wider Lomond. It also has to be re-stated that the overall objective of the Argyll and Bute Single Outcome Agreement (SOA) (Core Doc Ref. xxxx) that was agreed by the Scottish Government is “Argyll and Bute’s economic success is built on a growing population”. This is particularly relevant to Helensburgh and Lomond given its sustained population loss over a number of decades with a 7.5% decrease recorded between 2001 and 2011 as stated on page 6 of the SOA.

While the Council considers that reversing this population decline in Helensburgh and Lomond is a top priority for the Council, it does not consider that the proposed settlement and spatial strategy as contained within the plan will led to an extreme population growth as suggested by the Objector. The Council also considers that spatial and settlement strategy as proposed fully recognises the different problems that Helensburgh and Lomond has to deal with even though many issues are also shared such as the need for superfast

broadband and up to date telecommunications, improved transport connectivity, a vital and attractive town centre, new employment opportunities, the need to reduce our carbon footprint through the development of appropriate scales of renewable energy, better housing choice, including affordable housing and the need to make Helensburgh more attractive for tourists to visit and help support the growth of local businesses.

**Mr Alastair MacBeth (Helensburgh Study Group) (00166);**

The Council agrees with the Objector that Helensburgh enjoys a “superb countryside setting” but the bullet points listed in Paragraph 2.3.2 are designed to be aspirational to help inform what Helensburgh and Lomond could be by 2024.

Consequently the Council sees no need to include reference to the countryside other than in the final bullet point which calls for Helensburgh and Lomond to be a “greener place” including “community forests and green networks.” In addition the Council does not support the replacement of the word “offer” in bullet point 4 with the words “continue to provide” as housing choice is limited for people in Helensburgh and communities such as Cardross where the Government approved Housing Needs and Demand Assessment (Core Doc ref. xxx) supports the level of green belt release that is contained within the plan.

The Council does not propose that Helensburgh will become an “industrialised town” as suggested by the Objector. Additional employment opportunities are required in Helensburgh and Lomond and the plan supports sustainable economic growth to help achieve this. The Council would also like to state that Helensburgh is not simply a residential community. The town is a centre of employment for a wide range of industry sectors including public services, tourism, leisure, retail, commercial services, transport, private education and manufacturing. The town and Rosneath Peninsula lie in close proximity to the major employment base of Faslane and Coulport which have significant potential to deliver additional job opportunities through the implementation of the maritime change programme.

The intention of the plan is to continue to grow this employment base in a sustainable manner that takes full account of all the relevant policies and supplementary guidance that the plan contains, to the benefit of the Helensburgh and Lomond area.

**Mr Nigel Millar (Helensburgh Community Council) (00135);**

The Council would have no objection, if the Reporter was so minded, to add the words “a revitalised Hermitage Park” to the 3<sup>rd</sup> bullet point after the word centre. The Council has been working with the friends of the park to help deliver improvements of the park and remains supportive of the project.

The Council would have no objection, if the Reporter was so minded, to add the words “surrounding countryside, recreational access to the River Clyde” after the word park in the 5<sup>th</sup> bullet point of Paragraph 2.3.2.

As previously stated the bullet points listed in Paragraph 2.3.2 are designed to be aspirational to help inform what Helensburgh and Lomond could be by 2024 and the addition of these words can add to these aspirations.

The Council does not agree with the Objector’s proposed changes to the 4<sup>th</sup> bullet point as this bullet point reflects the focus of the settlement strategy within the plan that focusses larger scale growth in Helensburgh and Cardross in line with identified housing needs that will require new development to be located on appropriate locations within the Green Belt in addition to brownfield land and underused sites within the settlement boundary.

The Council would have no objection to the word “,woodlands” to be added to the 6<sup>th</sup> bullet point after the word “forests” in Paragraph 2.3.2 ,if the Reporter was so minded, given the scale of the woodlands adjacent to the likes of Helensburgh. That said there does remain the potential for community forests in the Rosneath Peninsular.

**Ms Kathleen Siddle (Helensburgh Community Woodlands Group) (01766);**

The Council would have no objection to the word “,woodlands” to be added to the 6th bullet point after the word “forests” in Paragraph 2.3.2 ,if the Reporter was so minded, given the scale of the woodlands adjacent to the likes of Helensburgh. That said there does remain the potential for community forests in the Rosneath Peninsular. The Council does not support the other additional wording changes proposed in the 3<sup>rd</sup> bullet point by the Objector as it risks being repetitive.

**Mr Murdo MacDonald (Rosneath Peninsula West Community Development Trust) (01257):**

The Council does not think that Paragraph 2.3.2 is the right place in the plan to deal with the issues raised by the Objector or make commitments with individual community groups. The Council has no objection to working with the Rosneath Peninsula West Community Development Trust and would be happy to assist them with developing their specific proposals through community plans for the Key Rural Settlements identified in their area that will be subject to detailed consultation with local people directly affected by them.

**Reporter’s conclusions:**

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**Reporter’s recommendations:**

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<b>ISS111</b>	<b>PDA 3/11 Rosneath and Open Space Protection Area</b>	
<b>Development plan reference:</b>	PDA 3/11 - Rosneath - Waterfront 1	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p> <b>Mr Andrew Gillon (01673)</b>  <b>Ms Janet Cassie (01961)</b>  <b>Mr Ian Todd (02090)</b>  <b>Miss Amy Birch (01948)</b>  <b>Mrs Nicola Campbell (01959)</b> </p>		
<b>Provision of the development plan to which the issue relates:</b>		
<b>Planning authority's summary of the representation(s):</b>		
<p> <b>Mr Andrew Gillon (01673) - PDA 3/11</b>  <b>Ms Janet Cassie (01961) - PDA 3/11</b>  <b>Mr Ian Todd (02090) - PDA 3/11</b>  <b>Miss Amy Birch (01948) - PDA 3/11</b>  <b>Mrs Nicola Campbell (01959) - PDA 3/11</b> </p> <p>The area known as the DUMPS between Camsail Road and high water mark should have the open space protection area extended over its entirety and should be removed from the Potential Development Area which covers the area to the south.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p> <b>Mr Andrew Gillon (01673) - PDA 3/11</b>  <b>Ms Janet Cassie (01961) - PDA 3/11</b>  <b>Mr Ian Todd (02090) - PDA 3/11</b>  <b>Miss Amy Birch (01948) - PDA 3/11</b>  <b>Mrs Nicola Campbell (01959) - PDA 3/11</b> </p> <p>The Open Space Protection Area (OSPA) extended to the north west and the boundaries of the Potential Development Area (PDA 3/11) be amended to exclude the area identified as the Open Space Protection Area.</p>		
<b>Summary of responses (including reasons) by planning authority:</b>		
<p> <b>Mr Andrew Gillon (01673) - PDA 3/11</b>  <b>Ms Janet Cassie (01961) - PDA 3/11</b>  <b>Mr Ian Todd (02090) - PDA 3/11</b>  <b>Miss Amy Birch (01948) - PDA 3/11</b>  <b>Mrs Nicola Campbell (01959) - PDA 3/11</b> </p>		



**Overview**

In the adopted Argyll and Bute Local Plan (Core doc. Ref **xxxx**) the Potential Development Area PDA 3/11 is drawn to include an area of brownfield land to the south of the residential development at Argyll Road / Camsail Road in Rosneath and also the undeveloped, grassed area of open space between the existing housing development and the foreshore to the east. The purposes of the designation are given as housing/leisure. (See Core Doc **xxxx**) The majority of the undeveloped area which lies between the houses and the foreshore is covered by an Open Space Protection Area (OSPA) designation, and as such would not be considered suitable for housing, but would allow for leisure uses which are compatible with the open space protection area would be appropriate. These leisure uses are likely to comprise use of the area for informal recreational purposes. This reflects the current use of this area including the north west part of the PDA which is currently outwith the OSPA.

Given the current uses of this area and the likely development expectations for the area, the Council would be content if the Reporter was so minded that the OSPA could be extended to include this area, and that the area designated as OSPA be specifically excluded from the area identified as PDA 3/11.

**Conclusion**

In conclusion, if the Reporter is so minded, the Council would have no objection to the boundaries of the PDA being altered to exclude an enlarged OSPA and the description of the PDA being subsequently amended to include Housing only and delete the reference to leisure. (See production ref **xxxx**) (*map of proposed map change*),.

**Reporter's conclusions:**

**Reporter's recommendations:**

<b>ISS113</b>	PDA 3/29 Rhu	
<b>Development plan reference:</b>	PDA 3/29 - Rhu Marina	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Rhu Marina Developments (01894)  Mr And Mrs David And Anne Carswell (01063)  Mr Brian Cook (00701)  Ms Jean Cook (01966)  Mr James Duncan (01978)  Ms Linda Duncan (01979)  Mr Michael McAuley (00936)  Ms Pat Pollok-Morris (00276)  Rhu and Shandon Community Council (01260)  Mr Alastair Moore (02046)  Mrs Hilda Massey (02030)  Mr Jack Rudram (02117)  Mr James Johnstone (02009)</p>		
<b>Provision of the development plan to which the issue relates:</b>		
<b>Planning authority's summary of the representation(s):</b>		
<p><b>PDA 3/29 - Rhu Marina Developments (01894)</b>  Rhu Marina Developments have submitted a master plan for the area which shows the Potential Development Area enlarged to include an area of infill. The infill area is required in order to allow the development of the site for the benefit of the community as a whole and provide the space and facilities intended for the site. They are also requesting that the residential density be reduced from high to medium, as high density residential units are not appropriate or required on the site.</p> <p><b>PDA 3/29 - Mr And Mrs David And Anne Carswell (01063)</b>  Concerned about the impact and height of the proposed buildings, and associated volume of traffic and the infrastructure is already overburdened.</p> <p><b>PDA 3/29 - Mr Brian Cook (00701)</b>  The proposed development is incompatible with Rhu's Conservation Area status. Existing policy states that coastal development should only be allowed where it is essential. Housing does not require a coastal location. Any development of the marina should be for marine associated activities. No building should be more than one storey high and land reclamation is unnecessary.  PDA 3/29 Map 6 - I support this as written. Land reclamation between the Marina and the off-base reception site [hangars] is not necessary and it is no longer recommended.</p> <p><b>PDA 3/29 - Ms Jean Cook (01966)</b>  I support the area in map 6 for the Potential Development area 3/29 and fully support the decision not to undertake any land reclamation. The proposed schedule calls for a high density of development with a minimum of 25% affordability. I object to this because there has been no consultation on the change to high density, housing does not require a coastal</p>		

location, such developments are inappropriate to a village, and would have a negative impact on views of the conservation area.

**PDA 3/29 - Mr James Duncan (01978)**

The proposed schedule calls for a high density of development with a minimum of 25% affordability. I object to this because there has been no consultation on the change to high density, housing does not require a coastal location, such developments are inappropriate to a village, and would have a negative impact on views of the conservation area. Buildings on this site should be low rise and spaced so as to provide walkways, viewpoints and public open space. Medium and large scale developments are inappropriate in villages. Whilst density and scale are different high density can be construed as larger scale, out of keeping with the village setting.

**PDA 3/29 - Ms Linda Duncan (01979)**

The proposed schedule calls for a high density of development with a minimum of 25% affordability. I object to this because there has been no consultation on the change to high density, housing does not require a coastal location, such developments are inappropriate to a village, and would have a negative impact on views of the conservation area.

**PDA 3/29 - Mr Michael McAuley (00936)**

This area is described in the Environmental Statement as adjacent to a Conservation Area. This is incorrect as this area currently forms part of a Conservation Area. Had the correct statement been included in the ES, the Assessment would require to be clearer.

The density has been changed to high and no justification given for its change. Housing is contrary to both the existing Local Development Plan and Supplementary Guidance and should be removed. The 2009 Local Plan Coastal Development policy must apply this is contravened as residential use does not require a coastal location. Supplementary Guidance LDP CST 1 which accompanies the proposed LDP makes it clear that applications for coastal development on land will only be supported where a coastal location is essential to the development.

**PDA 3/29 - Ms Pat Pollok-Morris (00276)**

This site should be developed for directly marine based activities but not for housing there is no need for such development on a coastal site in a conservation area, and there is a presumption against large or medium scale housing in villages and minor settlements. High density housing seems particularly inappropriate.

**PDA 3/29 - Rhu and Shandon Community Council (01260)**

The proposed schedule calls for a high density of development with a minimum of 25% affordability. This is inappropriate. The site is a key element in views of Rhu Bay and the setting of the conservation area. High density housing will impact that setting, of particular concern is the introduction of housing between the A814 and the sea. Buildings on this site should be low rise and spaced so as to provide walkways, viewpoints and public open space. Whilst density and scale are different high density can be construed as larger scale, out of keeping with the village setting. Housing does not require a coastal location, and on this site is seen as providing no economic or social benefit to the community.

**PDA 3/29 - Rhu and Shandon Community Council (01260)**

R&S CC support the area delineated in Map 6 for the Potential Development Area PDA 3/29. R&S CC are pleased that the PDA has not been expanded and fully support the decision not to introduce a wider area and land reclamation as indicated by HL12 of the Main Issues Report.

**PDA 3/29 - Mr Alastair Moore (02046)**

I strongly object to any house building within this small section of ground at Rhu Marina in the

bay of Rhu. It is not a suitable location for lots of reasons and would be out of character and not wanted in Rhu Conservation Village.

**PDA 3/29 - Mrs Hilda Massey (02030)**

I am concerned about the height of the proposed buildings that are to be built, also the volume of traffic on the access road to the marina, and that further development will occur in the future.

**PDA 3/29 - Mr Jack Rudram (02117)**

The proposed schedule refers to a high density of development, presumably housing, and minimum 25% affordability. This is considered inappropriate on this site, particularly with respect to housing.

**PDA 3/29 - Mr Jack Rudram (02117)**

I support the area delineated in Map 6 for the Potential Development Area PDA 3/29. I am pleased that the PDA has not been expanded and fully support the decision not to introduce a wider area and land reclamation as indicated by HL12 of the Main Issues Report.

**PDA 3/29 - Mr James Johnstone (02009)**

A high density development in this area will result in a significant loss of amenity and local wildlife. Local infrastructure is not suitable for such development, particularly the road through Rhu to Garelochhead which is already dangerous for pedestrians and cyclists to use.

**Modifications sought by those submitting representations:**

**PDA 3/29 - Rhu Marina Developments (01894)**

Change high density to medium in schedule 8.2, and increase the area of the PDA to that shown in the submitted master plan.

**PDA 3/29 - Mr Brian Cook (00701)**

Housing on the site should not be permitted and any buildings should be low rise.

**PDA 3/29 - Mr James Duncan (01978)**

The reference in Schedule 8.2 to "High" density housing should be deleted. I would like there be no housing on this site and would reclassify it's use as "Mixed use – leisure/tourism and marina related only"

**PDA 3/29 - Ms Linda Duncan (01979)**

Housing should be deleted from this proposal. The marina should be developed as a marina for marina associated activities.

**PDA 3/29 - Mr Michael McAuley (00936)**

Removal of reference to housing, or if it is retained it should be low density housing.

**PDA 3/29 - Ms Pat Pollok-Morris (00276)**

Removal of the housing use from the PDA

**PDA 3/29 - Rhu and Shandon Community Council (01260)**

A majority in the community would prefer there to be no housing on this site. This would reclassify it's use as "Mixed use – leisure/tourism/business/retail" with the density then being as per the adopted Local Plan 2009 specified as "N/A".

If it is minded to retain housing within the use categories for PDA 3/29, against the advice of the R&S CC, then the density should be re-categorised as "Low", and certainly no higher than "Medium".

**PDA 3/29 - Mr Alastair Moore (02046)**

Any building at the location of Rhu Marina should only be a Facilities / Reception area with a maximum height of one level high.

**PDA 3/29 - Mrs Hilda Massey (02030)**

The buildings erected should be minimum height and not cause a blot on the landscape. The number of apartments reduced, and roads improved.

**PDA 3/29 - Mr Jack Rudram (02117)**

I would prefer there to be no housing on this site and it's use reclassified as "Mixed use – leisure/tourism/business/retail" with the density then being as per the adopted Local Plan 2009 specified as "N/A".

If housing is retained, then the density should be re-categorised as "Low", and certainly no higher than "Medium".

**PDA 3/29 - Mr James Johnstone (02009)**

Complete removal from the plan.

**PDA 3/29 - Mr And Mrs David And Anne Carswell (01063)**

**PDA 3/29 - Ms Jean Cook (01966)**

**PDA 3/29 - Rhu and Shandon Community Council (01260)**

**PDA 3/29 - Mr Jack Rudram (02117)**

None specified

**Summary of responses (including reasons) by planning authority:**

**PDA 3/29 - Rhu Marina Developments (01894)**

The site has been subject to a number of planning applications in recent years including one for the enlargement of the area by infilling and land reclamation works to allow the erection of a new building to provide pubic bar, restaurant, hotel, office accommodation and ancillary facilities (see production xxxx – application ref 04/-1218/DET) and another more recently for the change of use of land to allow the siting of a temporary modular office building, two storage containers, security fence and pontoons for docking (see production ref xxxx - application ref 12/01696/PP) which was accompanied by an indicative master plan showing how the site may be developed overall (see production xxxx). The content of these applications are reflected in the representations from Rhu Marina Developments. The planning application for infill and reclamation works was consented but this consent has now lapsed. This consent was reflected in the proposals for an enlarged site which was included in the Main Issues Report. However in response to the representations on the Main Issues Report the Council decided not to include the enlarged PDA in the PLDP. The application for the temporary modular office building and the accompanying masterplan proposals were subject to public advertisement and consultation at around the same time as consultation on the PLDP. This application was subsequently given temporary consent as a minor departure from the Adopted Local Plan following a hearing by the Councils Planning Protective Services and Licencing Committee on 27<sup>th</sup> August 2013. The same committee also considered the proposed masterplan and concluded " that the current proposals contained within the proposed Masterplan are out of keeping with the general character of the Rhu Conservation Area. The PPSLC agrees that there is insufficient detail to assess the proposed redevelopment in principle with particular concerns relating to the scale and massing of the proposed buildings and the scale of the proposed infill. As a result, it is agreed that the application for the Masterplan be refused." (See Production xxxx minutes of PPSLC 27<sup>th</sup> August 2013) The objection element of

responses to the PLDP are considered to reflect concerns over the master plan proposed by the developers, and not just those of the LDP. It is noted that a number of those who have objected have also written to support the PLDP proposals map for the PDA and its description as outlined in the adopted local plan.

**PDA 3/29 - Mr And Mrs David And Anne Carswell (01063), PDA 3/29 - Mr Brian Cook (00701), PDA 3/29 - Ms Jean Cook (01966), PDA 3/29 - Mr James Duncan (01978), PDA 3/29 - Ms Linda Duncan (01979), PDA 3/29 - Mr Michael McAuley (00936), PDA 3/29 - Ms Pat Pollok-Morris (00276), PDA 3/29 - Rhu and Shandon Community Council (01260), PDA 3/29 - Mr Alastair Moore (02046), PDA 3/29 - Mrs Hilda Massey (02030), PDA 3/29 - Mr Jack Rudram (02117), PDA 3/29 - Mr James Johnstone (02009)**

**Object to Scale of Proposed Development, particularly high density residential development as this will have an adverse effect on the character of the conservation area, and does not require a coastal location. Concerned about the increased traffic as a result of the development.**

This potential development area was included in the Adopted Local Plan, (see core document ref xxxx) the uses proposed for it as well as its area has not been changed in the proposed local development plan. The only change has been the amendment of the description of the density considered acceptable on the site. In the adopted local plan the density was described as N/A (not applicable). This description being applied to potential development areas where the primary use was not intended to be residential. The proposed local development plan (LDP) now indicates that the residential component of any development on this PDA is expected to be high density. It is not intended to indicate that the overall development of the site should be high density, merely that the residential component should seek to achieve a density in the order of 30 units per hectare on a pro rata basis. This type of density would allow town houses, and low rise flatted development suitable for smaller households to be provided. The areas designation as a mixed use Potential Development Area, requires a Masterplan to be submitted with any proposals which demonstrates how the range of uses identified in the LDP schedule for the site can be accommodated. Housing is only one element of the range of uses expected as part of a modern marina development the overall development of which requires a coastal location.

Rhu conservation area has been drawn to extend to low water mark. It covers the most of the settlement, with the exception of the predominantly MoD housing to the north. There are a wide range building styles, types and ages, set in a fairly organic pattern of development. The unifying feature of which is the significant contribution which trees and woodland make to the setting of development. On the shore side of the road the marina contains a mixture of utilitarian buildings, hardstanding areas and open space used for storage purposes together with some limited landscaped areas at the entrance. This combined with its' location on the shore side of the road mean that it is not homogenous with the rest of the conservation area. The redevelopment opportunities promoted by the sites identification as a potential development area, and its requirement for a detailed masterplan provide the means by which this part of the conservation area may be enhanced, by providing the opportunity to promote a landscaping and tree planting scheme, a rationalisation of existing buildings, and a co-ordinated approach to design and finishes of new buildings.

The area road engineer has raised no concerns in principle with regard to this proposed Potential Development Area.

**Reporter's conclusions:**

<b>Reporter's recommendations:</b>

<b>ISS114</b>	<b>Business and Industrial Land: Moss Road</b>	
<b>Development plan reference:</b>	PDA2001 - Helensburgh, Claddoch Moss Road	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Helensburgh Study Group (00166)  Helensburgh Community Council (00135)  Scottish Natural Heritage (01587)  Henry Brothers (00790)  Henry Brothers (00790)  Dr Geoff Riddington (02068)</p>		
<b>Provision of the development plan to which the issue relates:</b>		
<b>Planning authority's summary of the representation(s):</b>		
<p><b>Helensburgh Study Group (00166) - PDA2001</b>  It seems inappropriate to identify a possibility of a "dirty" industrial site PDA 2001 within the coastal zone, within the Green Belt, on a core path and on the shore side of the railway.</p> <p><b>Helensburgh Community Council (00135) - PDA2001</b>  PDA 2001 not suitable as a site, it is in the Green Belt, access is via a level crossing over a busy railway line. In addition Moss Road is use by walkers to access the River Clyde and footpaths there, raising serious safety concerns.</p> <p><b>Scottish Natural Heritage (01587) - PDA2001</b>  Close to Inner Clyde Special Protection Area (SPA) and so requires assessment as part of the Habitats Regulations Appraisal (HRA) of this plan</p> <p><b>Henry Brothers (00790) - PDA2001</b>  The land owned and operated by Henry Brothers at Claddoch should also be included in any delineated Potential Development Area, as it was historically part of the same railway sidings, and is currently in use for Classes 5 and 6 as well Headquarters offices. It would be inconceivable not to acknowledge that the uses that the PDA promote are already in existence in part of the former sidings area. The PDA2001 allocation should be extended to include our client's land to the north of the railway line. Our client currently has a restriction in their original planning permission that permitted the establishment of their business at this location. Their premises and yard space are an existing brownfield site located within the Green Belt and should be recognised. Accordingly, would seek the removal of our client's site at Claddoch from the defined greenbelt allocation in recognition of its established use; we also seek acknowledgement of the site as a Business and Industry allocation within the LDP.</p> <p><b>Dr Geoff Riddington (02068) - PDA2001</b>  Given the environmental designations and Coastal, Green Belt and Access policies there is a sense of amazement that the planners could identify a possibility of a "dirty" industrial site PDA 2001 within the coastal zone.</p>		
<b>Modifications sought by those submitting representations:</b>		



**Helensburgh Study Group (00166) - PDA2001**

It is proposed that the PDA 2001 be removed

**Helensburgh Community Council (00135) - PDA2001**

An alternative site should be identified in the LDP

**Scottish Natural Heritage (01587) - PDA2001**

HRA of plan required

**Henry Brothers (00790) - PDA2001**

The boundary for proposed PDA2001 should be amended to include the Henry Brothers site to the north of the railway sidings, or it should be removed from green belt and identified as an established business and industry area in the plan.

**Dr Geoff Riddington (02068) - PDA2001**

Remove PDA

**Summary of responses (including reasons) by planning authority:****Helensburgh Study Group (00166) - PDA2001, Helensburgh Community Council (00135) - PDA2001, Dr Geoff Riddington (02068) - PDA2001**

The plan has identified a need to provide an opportunity for bad neighbour industrial uses to be accommodated in the Helensburgh area, such uses by their very nature are not compatible with the existing built up area of the town. If such a facility is to be provided in reasonably close proximity to the town then use of part of the green belt to provide such a facility is inevitable. There is some evidence of former use of this area, and there are other "bad neighbour" uses (such as the waste water treatment facility) nearby. Scottish Planning Policy on Green Belts (para 159) describes the primary functions of green belt land to : direct planned growth to the most appropriate locations and support regeneration; protect and enhance the quality, character, landscape setting and identity of towns and cities, and; protect and give access to open space within and around towns and cities. Outwith strategic development plan areas, SPP tasks LDP's to provide the framework for planning in the area including long term strategic issues such as greenbelt, and the necessary adjustments which might need to be made to secure the proper planning of the area.

Identification of the area as a Potential Development Area in the plan recognises the fact that there are a number of issues that potential developers of the site would have to address. These are highlighted in the mini development brief which forms part of the supplementary guidance which accompanies this plan (**see production no xxxx**). In particular the requirement for the access to the site to be via a public road involving the use of a level crossing is identified as an issue which would require to be resolved. If this were done then the issue of public access to the area would be resolved, and may result in improved public access to the coast at this location. While the site is near the coast and the Inner Clyde SPA, it is not immediately adjacent, and given the size of the potential development area and the scale of operations likely to be capable of being accommodated within the area, it is not anticipated that there will be any direct or indirect effects on the internationally designated area as demonstrated in the HRA which accompanies this plan (see core document **xxxx**). The site itself is recognised as forming part of an area identified as a Local Nature Conservation Site, in the Adopted Local Plan having previously been identified as a Site of Importance for Nature Conservation) in the Dumbaron District District Wide Local Plan 1999. The master plan which would be required to accompany any development proposals for this PDA would be expected to include ecological surveys, and provide appropriate mitigation and or management measures to ensure no diminution in the quality of the habitats

**Henry Brothers (00790) - PDA2001**

The identification of the area at Claddoch as a Potential Development Area for Class 5 and 6 uses, is in recognition that within the plan period opportunities for development in the area may emerge. Such opportunities are not currently fully resolved and issues may require to be overcome. These are set out in the mini development brief which accompanies this PDA and which are set out in supplementary guidance. One of the key requirements of all mini development briefs, is that a comprehensive master plan be produced to accompany any development proposals. This is to ensure a co-ordinated approach to the planning of the area. It would not be appropriate to include the Henry Brothers site in this area, as the issues which require to be resolved are different. The Henry Brothers site already has planning consent for the uses covered in their operation. Their consent recognises their circumstances and those of the site (see production xxxx). Given the nature of their planning consent and the fact that there is some uncertainty regarding the delivery of the PDA during the course of the plan, inclusion of the Henry Brothers site as part of the Potential Development Area is not considered appropriate at this time. Additionally given the nature of their planning consent it is not appropriate to identify their site for unrestricted business and industrial use at present. This matter can however be kept under review, and if the PDA is developed and is successful in attracting business and industrial uses in to the area the adjoining site could be considered for inclusion in a larger Established Business and Industry Area in due course.

**Scottish Natural Heritage (01587) - PDA2001**

This site will be included within the Habitats Regulations Assessment of the Plan. Given the sites location and adjoining land uses it is not anticipated that its development will have any direct or indirect effects on the internationally designated area.

**Conclusions**

In view of all the above the Council recommends that no modification to the proposed LDP be undertaken as a result of these objections made to the proposed LDP.

**Reporter's conclusions:**

**Reporter's recommendations:**

<b>ISS115</b>	<b>Additional Protection: Castle Wood, Helensburgh</b>	
<b>Development plan reference:</b>	S102 - Castle Woods, Helensburgh	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p><b>Helensburgh Community Woodlands Group (01766);</b>  <b>Helensburgh Green Belt Group (00167);</b>  <b>Helensburgh Community Council (00135);</b>  <b>Friends of Duchess Wood (00821):</b></p>		
<b>Provision of the development plan to which the issue relates:</b>		
<b>Planning authority's summary of the representation(s):</b>		
<p><b>Helensburgh Community Woodlands Group (01766) - S102</b></p> <p>The objector states that Castle Woods is:</p> <ul style="list-style-type: none"> <li>- a continuous area of long established broadleaved woodland</li> <li>- a continuation/extension of Duchess Woods</li> <li>- both Duchess Woods and part of Castle Woods have a LNCS designation</li> <li>- an important site locally for wildlife and nature interests</li> <li>- a site of value for environmental education for the local community.</li> </ul> <p>For the above reasons, the Helensburgh Community Woodlands Group asks Argyll and Bute Council to designate the whole of Castle Woods as a Local Nature Conservation Site.  For the above reasons, the Helensburgh Community Woodlands Group also asks Argyll and Bute Council to designate the whole of Castle Woods as Green Belt in the new Local Development Plan.</p> <p><b>Helensburgh Green Belt Group (00167) - S102</b></p> <p>The Objector considers that Castle Wood is a valuable community woodland and that it should be given maximum protection. Ownership is an issue, but HGBG has read the excellent management plan put forward by the Helensburgh Community Woodlands Group which also seeks to lease or purchase the land. If so, there would be the basis of a community woodland as implied by its current semi-protected status.</p> <p><b>Helensburgh Community Council (00135) - S102</b></p> <p>The Objector supports the Helensburgh Community Woodlands Group that Castle Wood should have three designations : Local Nature Conservation Site, Green Belt and Open Space Protection Area.</p> <p><b>Friends of Duchess Wood (00821) - S102</b></p> <p>The Friends of Duchess Wood (FODW) supports the request by the Helensburgh Community Woodlands Group that Castle Wood (south of the Lomond School playing fields) should be designated throughout as an Open Space Protection Area, Local Nature Conservation Site</p>		

and Green Belt.

**Modifications sought by those submitting representations:**

**Helensburgh Community Woodlands Group (01766) - S102**

The Helensburgh Community Woodlands Group would remove its objection, if a Green Belt designation was awarded to Castle Woods in the LDP. The Helensburgh Community Woodlands Group would remove this objection if the whole of Castle Woods were to be re-designated as a Local Nature Conservation Site.

**Helensburgh Green Belt Group (00167) - S102**

Presently Castle Wood is fully designated as an Open Space Protection Area and partially designated as a Local Nature Conservation Site. HGBG urges that it be fully covered by both designations.

**Helensburgh Community Council (00135) - S102**

Castle Wood should have three designations : Local Nature Conservation Site, Green Belt and Open Space Protection Area.

**Friends of Duchess Wood (00821) - S102**

Open Space Protection Area, Local Nature Conservation Site and Green Belt designations of Castle Wood are required to be recognised in the LDP.

**Summary of responses (including reasons) by planning authority:**

The proposed LDP makes no changes to the designations for this area of woodland which are shown in the Adopted Local Plan. The woodlands status as an Open Space Protection Area was confirmed by the Reporters at the last local plan inquiry, (see production xxxx) where objections were received to this designation from potential developers. The Reporters' conclusions stated that "The site is larger than the others, it contains a variety of trees and its visual contribution is also greater. It is held in greater esteem in terms of the Council's rankings and, considered as part of the south end of the larger Duchess Wood. Even in its own right, we consider this woodland to be a valuable asset to the town."... "We consider that woodland which is valued as being of community benefit, as this wood so clearly is, should not lightly be passed over to development. In any case, remaining areas of ancient woodland such as this are an increasingly scarce resource." They concluded : "We consider that the open spaces speak for themselves."

In relation to the proposal that Castle Woods be designated as green belt this is not considered consistent with the Green Belt Landscape Capacity Study (see core document xxxx) as it does not recommend that the green belt designation be extended in this locale. Indeed the study, which was carried out by qualified landscape architects, had recommended that the area to the immediate north of Castle Woods be removed from the Green Belt because it was considered to have an urban green space character and not a typical green belt use, whereas the retention of its designation as an Open Space Protection Area was considered more appropriate. The Objector's have not

demonstrated that Castle Woods contribute to recognized green belt function of supporting the management of long term growth of a settlement at a strategic level.

While SPP paragraph 159 refers to protect and give access to open space within and around towns, and also to protect and enhance landscape setting of towns as functions of a green belt, this is as part of a settlement strategy for an area. This confirms that greenbelts are to be used as part of a strategic approach to development planning and that, “designation as green belt is not intended to be used to protect natural heritage” (SPP paragraph 160).

The northern part of Castle Wood is covered by a Local Nature Conservation Site designation, these designations which were recognized in the current Adopted Argyll and Bute Local Plan 2009 which is in turn a continuation of a previous designation that was included in the Dunbarton District District Wide Local Plan 1999 as Sites of Importance for Nature Conservation (SINC) These sites were identified in Nature Conservation Strategies backed by Scottish Natural Heritage and undertaken for the Lower Clyde Area in 1993. The rationale for including such sites is therefore clearly established.

The Open Space Protection Area designation therefore remains a relevant designation, and this together with other policies and associated Supplementary Guidance of the Proposed Local Development Plan provides a sufficiently robust policy framework within which the appropriate level of protection from development can be afforded to this area.

### **Conclusions**

The Council therefore recommends, for the reasons given above, that no changes be made to the Proposed LDP as a result of these objections.

<b>Reporter’s conclusions:</b>
<b>Reporter’s recommendations:</b>

<b>ISS116</b>	<b>Settlement Boundary Adjustment: Portincaple</b>	
<b>Development plan reference:</b>	<b>S103 - Portincaple, Settlement Boundary</b>	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<b>Mr Jeremy Bernau (00850):</b>		
<b>Provision of the development plan to which the issue relates:</b>		
<b>Planning authority's summary of the representation(s):</b>		
<p><b>Mr Jeremy Bernau (00850) - S103</b></p> <p>This response refers to the allocation of land identified as Settlement Zone in Portincaple.</p> <p>A. The road is entirely unsuitable to support any further development:</p> <p>B. The lack of facilities make further development untenable – there is no mains gas and mains sewage.</p> <p>C. The settlement zone area accessed from the turning point between ‘Woodstock and Road End Cottage is anomalous. It is at odds with the current settlement pattern i.e. single houses along either side of the road.</p> <p>D. The area of Portincaple is identified as an Area of Panoramic Quality (APQ). This panorama is enjoyed from the entire upper stretch of Feuins Road so to now consider obscuring it seems at odds with the APQ designation.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p><b>Mr Jeremy Bernau (00850) - S103</b></p> <p>The Settlement Zone in Portincaple is re-drawn to</p> <p>(1) significantly reduce its extent along the length of Feuins Road and to</p> <p>(2) remove the Settlement Zone that uses the turning place (between ‘Woodstock’ and ‘Road End Cottage’) as a point of access.</p>		
<b>Summary of responses (including reasons) by planning authority:</b>		
<p>The Proposed Local Development Plan has not altered the settlement boundaries at Portincaple from those which are identified in the current Adopted Local Plan. There were no objections to these boundaries at that time (2009) which were delineated in order to provide some opportunities for small scale infill and rounding off development. Issues such as the acceptable level of increase in vehicular use of the road, the need for additional services and appropriate pattern of development, are all assessed at the planning application stage. The settlement boundaries therefore provide a framework within which development proposals can be assessed. The requirement that these be small scale infill and rounding off, and that access and servicing arrangements be appropriate for the type and scale of development proposed, means that not every part of the area within the settlement boundary will be considered suitable for development.</p>		

**Conclusions**

Although the Council does not recommend making any prescribed modifications to the Plan, the Reporters may wish to consider if so minded, to an adjustment to the settlement pattern by removing the area to the rear and accessed from the turning space between 'Woodstock' and 'Road End Cottage' as this would not give rise to any significant issues in relation to the settlement and development strategy for the area. (See Map production xxx)

**Reporter's conclusions:**

**Reporter's recommendations:**

<b>ISS117</b>	<b>Conservation Area: Helensburgh</b>	
<b>Development plan reference:</b>	S107 - Helensburgh Conservation Areas	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
Helensburgh Community Council (00135)		
<b>Provision of the development plan to which the issue relates:</b>		
<b>Planning authority's summary of the representation(s):</b>		
<p><b>Helensburgh Community Council (00135) - S107</b></p> <p>Helensburgh's two Conservation Areas - the Hill House Conservation Area designated in 1971 and the Upper Helensburgh Conservation Area designated in 1994 are protected in the current 2009 Local Plan by Policy LP ENV 14 - Development in Conservation Areas and Special Built Environment Areas.</p> <p>In 2008 A&amp;BC published its Appraisal of the Helensburgh Conservation Areas. This appraisal has not been followed up with a Conservation Area Management Plan. This is unfortunate. Much of the infill development in the Conversation Areas has been of a mediocre design and layout which has done little or nothing to "preserve or enhance the character or appearance of a.... Conservation Area or its setting, " (LP ENV 14).</p>		
<b>Modifications sought by those submitting representations:</b>		
<p><b>Helensburgh Community Council (00135) - S107</b></p> <p>Management Plans to be produced for both Helensburgh Conservation Areas.</p>		
<b>Summary of responses (including reasons) by planning authority:</b>		
<p><b>Helensburgh Community Council (00135) - S107</b></p> <p>The Appraisal of the Conservation Areas in Helensburgh 2008 (see production <b>xxxx</b>) was produced by the Helensburgh Conservation Areas Group led by a Helensburgh Community Councillor, with support from Council Officers, and then adopted by Argyll and Bute Council. The appraisal contains a section on Managing Change which looks at pressures for change within the conservation areas, recommends approaches for dealing with such changes and also refers to Argyll and Bute Councils Sustainable Design Guidance Volume 3 Working with the Historic Built Environment (see production <b>xxxx</b>). The foregoing provide clear guidance on appropriate treatment of new development within the conservation area, and effectively constitute a management plan for the Helensburgh Conservation Areas.</p> <p>No modification to the Proposed Local Development Plan is therefore considered necessary.</p>		
<b>Reporter's conclusions:</b>		



<b>Reporter's recommendations:</b>

<b>ISS118</b>	<b>Additional Recognition: Duchess Wood, Helensburgh</b>	
<b>Development plan reference:</b>	S108 - Duchess Wood	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
Helensburgh Community Council (00135) Friends of Duchess Wood (00821)		
<b>Provision of the development plan to which the issue relates:</b>		
<b>Planning authority's summary of the representation(s):</b>		
<b>Helensburgh Community Council (00135) - S108</b> <b>Friends of Duchess Wood (00821) - S108</b> The Proposed Local Development Plan should include a reference in the text to Duchess Wood Local Nature Reserve		
<b>Modifications sought by those submitting representations:</b>		
<b>Helensburgh Community Council (00135) - S108</b> <b>Friends of Duchess Wood (00821) - S108</b>  The Proposed Local Development Plan should include a reference in the text to Duchess Wood Local Nature Reserve		
<b>Summary of responses (including reasons) by planning authority:</b>		
<b>Helensburgh Community Council (00135) - S108</b> <b>Friends of Duchess Wood (00821) - S108</b>  In the interests of brevity the Proposed Local Development Plan does not contain schedules of all sites and designations. The glossary to the Proposed Local Development Plan (see page 85 of core document <b>xxxx</b> ) does however provide a definition, both of a Local Nature Reserve (LNR) and also Local Nature Conservation Sites (LNCS) which include <i>inter alia</i> Local Nature Reserves. Local Nature Conservation Sites are shown on the Local Development Plan Proposals Maps, including Duchess Wood which is identified as both a LNCS and an Open Space Protection Area. Policy LDP 3 of the Local Development Plan and Supplementary Guidance SG LDP ENV5 provide the policy framework which seeks to protect LNCS (including LNRs) from detrimental development.		
<b><u>Conclusion</u></b>		
The Council considers therefore that modification of the Proposed Local Development Plan is not necessary. However, if the Reporters are so minded, the Local Development Plan Proposals Maps could be amended to show this additional designation.		
<b>Reporter's conclusions:</b>		

<b>Reporter's recommendations:</b>

<b>ISS119</b>	Housing Land: Ardoch	
<b>Development plan reference:</b>	<b>S111 - Ardoch</b>	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<b>Mr James Black (00520)</b>		
<b>Provision of the development plan to which the issue relates:</b>		
<b>Planning authority's summary of the representation(s):</b>		
<p><b>S111 - Mr James Black (00520)</b></p> <p>The Objector requests that a site at Ardoch be identified in the Local Development Plan for housing. The site is a "rounding off" gap site opportunity as defined in the glossaries of the current Local Plan and LDP. The site is visually contained, low quality and partially brownfield scrubland and sits below and between the railway and the houses to the north. There would be a clearly defined settlement/Green Belt boundary (the A814 and the railway). This can be further reinforced by tree planting to the west.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p><b>S111 - Mr James Black (00520)</b></p> <p>Removal of the site from the Green Belt and designation as housing site.</p>		
<b>Summary of responses (including reasons) by planning authority:</b>		
<p>Ardoch was identified as a Minor Settlement and its settlement boundaries within the greenbelt were identified in the Consultative Draft Argyll and Bute Local Plan as early as 2004. Following on from the Consultative Draft Plan, and at subsequent stages of the current Local Plan representations were received to have this area identified for housing. This matter was subsequently considered at the Local Plan Inquiry;(see production xxxx) and the Reporters stated " The site has many attributes in its favour.... In these terms, we agree with the objector that the site appears to comprise a development opportunity. On the other hand, although Ardoch is now identified as a minor settlement, we accept that there is no need for additional housing within its boundaries, or on the objection site.... and in the absence of any overwhelming need for the housing, that the land should remain in the green belt."</p> <p>Whilst recognising that the green belt boundary could be adjusted the Reporters concluded "that tinkering with the boundaries in this way should only be done where really necessary, and we prefer the comprehensive review of the green belt which the council proposes to carry out as soon as possible. As there is no established need for the development, we consider that any such adjustment of the green belt boundary should await the formal review." Accordingly the Reporters recommended no change to the plan.</p> <p>Following the Adoption of the Argyll and Bute Local Plan the Council commissioned a green</p>		

belt landscape review from consultant landscape architects (see core document xxxx). In carrying out the review the consultants were specifically tasked to assess the landscape value of all of the sites which had been the subject of representations on the Argyll and Bute Local Plan. Their assessment of the Ardoch site was that the area is of low to moderate importance within the green belt. The Green Belt Landscape Study was only one of the factors which were used to help identify those areas which should be released from the green belt in order to help deliver housing land requirements in accordance with the settlement strategy for the area. The Main Issues Report (MIR) for the Local Development Plan sought to identify those factors which require to be taken in to consideration when developing the settlement strategy for the area. In determining which areas would be suitable for identification as allocations the planning authority has had to have regard to Scottish Planning Policy, the requirement to promote sustainable developments, reduce carbon emissions, and provide housing opportunities which will help meet the housing requirements identified in the Housing Need and Demand Assessment for the Area.

The LDP settlement strategy seeks to deliver sustainable levels of growth by steering significant development to our existing settlements, where the bulk of our essential services, employment opportunities, community facilities and infrastructure services are available in our Main Towns and Key Settlements such as Helensburgh and Cardross.

The proposed settlement strategy was identified in the MIR as being most capable of meeting the requirement to secure sustainable development, provide opportunities to reduce carbon emissions, and the scale and type of housing opportunities capable of meeting the assessed housing need and demand in the area, is that adopted in the LDP.

The use of larger scale allocations to meet the identified housing needs will help to deliver a wider range of house types and sizes (including affordable housing) and associated open space and infrastructure requirements. It also allows more certainty regarding programming and timescale for delivery and can also result in greater economies of scale and certainty of delivery.

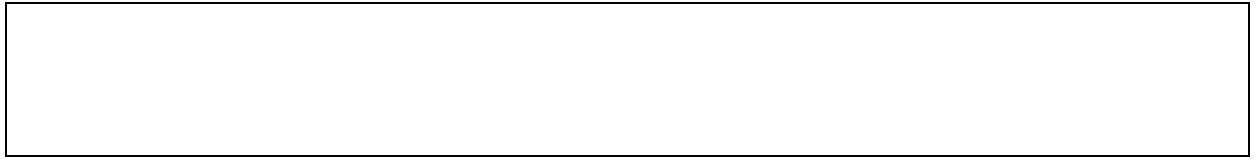
Ardoch is identified as a minor settlement where there is a presumption in favour of small scale development (defined in the adopted local plan as up to 5 dwelling houses) on suitable infill rounding off and redevelopment sites within the settlement boundary. There are over 150 minor settlements in the plan, however not every minor settlement will have the capacity to accommodate five additional houses. Ardoch has its settlement boundaries drawn fairly tightly to reflect the established settlement pattern, with green belt beyond them. As there is no established need for development in this location, and the site is too large to be considered infill and rounding off, the Council is of the opinion the site in question should remain in the green belt.

### **Conclusions**

In view of all the above the Council recommends that no modification to the proposed LDP be undertaken as a result of these objections made to the proposed LDP.

### **Reporter's conclusions:**

### **Reporter's recommendations:**



<b>ISS120</b>	Area for Action: Geilston House, Cardross	
<b>Development plan reference:</b>	S110 - Geilston House	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
The National Trust for Scotland (01901)		
<b>Provision of the development plan to which the issue relates:</b>		
<b>Planning authority's summary of the representation(s):</b>		
<p><b>S110 - The National Trust for Scotland (01901)</b>  The National Trust for Scotland (NTS) control Geilston House and Estate which is located on the western edge of Cardross, Argyll and Bute. The estate at Geilston comprises, Geilston House which is a Grade B listed building with the listing description making reference to the house, walled garden and green house. In addition, the Dovecot in the estate grounds is a Grade B listed building while the stables block is a Grade C listed building. The site has a varied topography with the site rising northwards from the A814 to a plateau towards the rear of the site, where the Geilston House, a visitor car park, stable buildings and garden grounds are situated.</p> <p>The grounds are currently open to visitors between March and October. Geilston House has never been open as a visitor attraction, visitor numbers are low and there are minimal opportunities for income generation.</p> <p>The trust have spent significant sums undertaking repair works to roof, ensuring that the building remains water tight. However, once the roof was made watertight a major outbreak of dry rot throughout the building was uncovered. This combined with alterations to the building over the years has weakened the structure, props have been inserted to support the upper floors and roof but the building does remain potentially unstable. The costs of properly reinstating the building would be significant, and with no clear use and no obvious options which would achieve a return capable of justifying the necessary expenditure, no progress has been made.</p> <p>The Trust would like to work in partnership with Argyll and Bute Council to prepare a development brief to consider the future of the estate, and the potential for enabling development to secure the long term future of Geilston House.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p><b>S110 - The National Trust for Scotland (01901)</b>  Land at Geilston House to be allocated in the Local Development Plan as an Area for Action</p>		
<b>Summary of responses (including reasons) by planning authority:</b>		
<p>Argyll and Bute Council recognises the rich and varied historic built environment of the area, and the contribution it makes to our way of life. The Local Development Plan (LDP) seeks to protect, conserve and enhance what we have through its policies, associated supplementary guidance, and Areas for Action which focus future regeneration activity on areas of priority. Policy LDP DM1 seeks to encourage sustainable development and recognises that in</p>		

exceptional cases in order to retain significant buildings at risk, enabling development and development which does not accord with the general settlement strategy may be justified. The use of AFA designations to provide a framework for the investigation of options to secure the future of vulnerable, important listed buildings in the green belt at Cardross can help to facilitate this policy, and has already been successfully used for St Peters/Kilmahew. Area remits for AFAs are developed as Supplementary Guidance and the remit for these can include; investment and funding packages, land assembly and asset management programmes, development and redevelopment proposals, infrastructure provision and environmental enhancement proposals. While the policies of the LDP together with the associated supplementary guidance enable a positive approach to be taken to securing viable uses for significant buildings (which would include listed buildings) designation as an AFA and the preparation of a development brief or master plan for the area, would enable proposals to be developed as supplementary guidance. This approach allows for greater public consultation and involvement in the process and would help to provide more certainty with regard to the nature and extent of enabling development which may be available to secure the long term future of these important listed buildings and associated gardens.

### **Conclusions**

In view of all the above, if the Reporter was so minded to identify an Area for Action as:

*Location: Geilston Estate, Cardross*

*Nature of Action: Local, safeguarding of historic property, consideration of redevelopment and enhancement, preparation of development brief required.*

The Council and National Trust for Scotland, or its agents could pursue in partnership, the preparation of associated supplementary guidance for this area following the adoption of the local development plan.

### **Reporter's conclusions:**

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### **Reporter's recommendations:**

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<b>ISS121</b>	Potential Development Area for Tourism Development: Rosneath Castle Caravan Park	
<b>Development plan reference:</b>	S112 - Rosneath Castle Caravan Park	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
Rosneath Castle Park (01852)		
<b>Provision of the development plan to which the issue relates:</b>		
<b>Planning authority's summary of the representation(s):</b>		
<b>S112 - Rosneath Castle Park (01852)</b>		
<p>The business has been run as a successful holiday and residential caravan park since 1954. It is licensed for 550 berths and currently has 480 occupied, bringing significant economic benefit to the area with some 40 local employees. The park owners are keen to maintain and develop the facilities, and wish to develop an area of overgrown forestry and woodland at the entrance to the park to provide:</p> <p>Site entrance with reception, ancillary facilities for some 120 pitch touring park with reception building and ancillary facilities, 50 holiday statics for seasonal holiday use, space for some 50 pitches for twin chalets or similar, but not for use as permanent residences, and an area of woodland for use for natural camping "pods" and "wigwams".</p> <p>There are environmental benefits associated with the development, in particular the clearing out of overgrown areas of rhododendron and wind damaged trees, together with the introduction of a woodland management plan - including new planting. The development would seek to incorporate sustainability measures (e.g. solar panels) and may help secure, and maintain existing employment opportunities.</p>		
<b>Modifications sought by those submitting representations:</b>		
<b>S112 - Rosneath Castle Park (01852)</b>		
<p>The Objector (01852) requests that the proposed extension to the existing holiday/ caravan park be identified as a Potential Development Area for tourism related development.</p>		
<b>Summary of responses (including reasons) by planning authority:</b>		
<p>The proposed LDP includes tourism as one of the main potential growth sectors supported by the plan. The Rosneath Peninsula is identified as a Tourism Development Area and this recognises the potential for this industry to expand in a sustainable way close to major tourist routes and where there are already a number of key tourism sites.</p> <p>The LDP also recognises the need to take a more flexible approach to ensure that economic opportunities can be fully realised whilst safeguarding the environmental assets of the area.</p> <p>Developments which improve our tourism offer can also play a key role in encouraging new</p>		

businesses to locate in Argyll and Bute, creating employment opportunities and encouraging more people to move permanently to the area. These outcomes accord fully with the Council's SOA (Core Doc Ref. xxx) overarching key objective.

In addition, the Supplementary Guidance which accompanies the LDP recognises the significant role which tourism plays in the economy of Argyll and Bute; SG LDP TOUR 1 contains a presumption in favour of new or improved tourist facilities and accommodation, SG LDP TOUR2 seeks to protect key tourism sites from non-tourism related development, and SG LDP TOUR 3 seeks to promote sustainable growth of tourism within the Tourism Development Areas, and encourage further development of new high quality tourism developments, wherever practicable utilising existing infrastructure.

The Proposed LDP has also identified a number of locations as Potential Development Areas for tourist related development where landowners have identified these sites through the plan process. Had the above representations been received at the call for sites stage or the MIR then the Council as Planning Authority would have been in a position to give them positive consideration, carry out an appropriate assessment, including screening for the Strategic Environmental Assessment accompanying the plan. Unfortunately, the representation was only made in response to the consultation on the Proposed Local Development Plan, and has therefore not been subject to consideration in terms of the Strategic Environmental Assessment or consultation with plan stakeholders.

Consequently, despite the recognition by the Council that the identification of a PDA on this site for tourism purposes could address environmental issues and potentially help support the intentions of the proposed LDP in terms of developing the tourism industry and growing the local economy. The Council cannot agree at this late stage of the plan process to include this site at this time as a PDA. The Council would therefore encourage the Objector to ensure that this site is identified at the call for sites stage to inform the contents of the next plan that will commence following the approval of this Proposed LDP.

**Conclusions**

In view of all the above the Council recommends that no modification to the proposed LDP be undertaken as a result of these objections made to the proposed LDP.

**Reporter's conclusions:**

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**Reporter's recommendations:**

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<b>ISS122</b>	Settlement Boundary Extension : Ardpeaton	
<b>Development plan reference:</b>	<b>S113 - Ardpeaton - Settlement Boundary Extension</b>	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
Messrs Feeney And Page (00783)		
<b>Provision of the development plan to which the issue relates:</b>		
<b>Planning authority's summary of the representation(s):</b>		
<p><b>S113 - Messrs Feeney And Page (00783)</b></p> <p>The Objector seeks the extension of the Ardpeaton Settlement boundary to incorporate their land. The land is located at Ardpeaton, Cove, sandwiched between two separate areas of land which are included within the defined settlement boundary. The Objector notes that the LDP proposes to allocate land east of Barbour Road and east of the settlement, within open countryside, as part of the settlement. The Objector states that our clients' land links these two areas and it is illogical to exclude it from the settlement. The site can be developed sympathetically and with little visual impact. The wooded area is identified as a Site of Importance to Nature Conservation, this designation does not preclude development, rather, it ensures that any development that is permitted does not significantly impact on the reasons why the site is designated as a SINCC. The manner in which the site may be developed can be controlled.</p>		
<b>Modifications sought by those submitting representations:</b>		
<p><b>S113 - Messrs Feeney And Page (00783)</b></p> <p>Amend the Proposals Map to extend the settlement boundary delineated for Ardpeaton, Cove to include our clients' land at Ardpeaton, thereby linking the two separate and disjointed settlement areas at Ardpeaton as one settlement.</p>		
<b>Summary of responses (including reasons) by planning authority:</b>		
<p>The Proposed Local Development Plan has not altered the settlement boundaries at Ardpeaton from those which are identified in the current Adopted Local Plan. The current boundaries have been delineated in order to provide some opportunities for small scale infill and rounding off development in accord with the settlement hierarchy established by the current Development Plan (Structure and Local Plan).</p> <p>The Proposed LDP makes no changes to the settlement boundary to the east of Barbour Road and east of the settlement, where land is identified as countryside it does not form part of the settlement, these designations being mutually exclusive.</p> <p>The existing settlement boundaries at Ardpeaton have been drawn to reflect the established pattern of development whilst also providing some opportunities for small scale development</p>		

where considered appropriate in terms of settlement and landscape pattern. The land to which this representation relates is partly wooded and sloping and provides a natural buffer between the coastal strip of development at Ardpeaton and the cluster of more recent development by the MoD on the western side of Barbour Road.

The area is also designated as an LNCS and is on Scottish Natural Heritage's inventory of ancient woodland. The Council therefore considers that its inclusion as part of a settlement would result in increased development pressure, lead to coalesce between Ardpeaton and the MoD housing on Barbour Road, and the loss of an established wildlife corridor.

The area to the immediate south of this area was considered at the public inquiry into the current Local Plan. The Council considers that the position with regard to this area is remarkably similar (see production xxxx) At that time the Reporters concluded that: "vacant sites are included within a settlement boundary often solely in order to direct development to them... We find that to include a site such as this therefore is effectively to identify it as White Land or land awaiting development.... We consider this use of the ground and its identification in this way to be unacceptable and agree with the council that, as it would extend the settlement of Ardpeaton towards the Ministry of Defence housing settlement to the rear, it would lead to coalescence, contrary to the tenets of sound planning. If it is not White Land or land awaiting development, then it should not be included within the settlement boundary."

### **Conclusions**

The Council therefore given all of the above, can see no justification for the settlement boundary to be altered in this location as a result of this objection and recommends that no modifications be made to the proposed LDP as a result of the objections made.

### **Reporter's conclusions:**

### **Reporter's recommendations:**

<b>ISS123</b>	Housing Land : Bloomhill Cardross	
<b>Development plan reference:</b>	S101 - Bloomhill, Cardross	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
The Chrystal Family Trust (01658)		
<b>Provision of the development plan to which the issue relates:</b>		
<b>Planning authority's summary of the representation(s):</b>		
<p><b>S101 - The Chrystal Family Trust (01658)</b></p> <p>The Chrystal Trust owns 5.1 acres at Bloomhill, Cardross. The site is shown edged red on the drawing that accompanies this submission, which also includes a plan of one possible scheme being considered for the site. (see production <b>xxxx</b>) The Trust is committed to developing the site in a sensitive manner, through a scheme that is architecturally respectful of the site's heritage, and that of the village, incorporating the latest in sustainable building design.</p> <p>The site could be developed in a number of ways, or indeed only part of the site could be developed with sheltered housing as an integral part and with the remainder left as open space to be enjoyed by the local community.</p> <p>This is a site that has a landowner who is willing to deliver the site in the short-term, who is committed to Cardross and who wishes to develop Bloomhill with a legacy scheme. The Trust also intends to develop a Design Code for the site to ensure that all site and development aspirations are delivered even if ownership of the site should change.</p> <p>Otherwise, and in terms of the effectiveness tests that all housing sites are required to be considered against the following comments are applicable.</p> <p>Flood risk - The intention is to produce a Flood Risk Assessment that will consider how developing the site could alter downstream flows. With appropriate SUDs measures, outflow into the burn post-development should not significantly change from the current greenfield flows.</p> <p>Built culture - The site is within the Cardross Conservation Area and has listed buildings and a scheduled ancient monument around its fringes. Scottish Government guidance is clear that historic environments can accommodate new development. In conservation areas, and in relation to the setting of listed buildings, these tests focus on whether the proposed development 'enhances' or 'preserves' the character and appearance of the area or the setting. SPP adds that, 'a proposed development that would have a neutral effect on the character or appearance of a conservation area (i.e. does no harm) should be treated as one which preserves that character or appearance' (paragraph 115).</p> <p>In this case, careful consideration has, and will, be given to the historic character of the area and any scheme that eventually comes forward on the site will be designed to respect the character of the area and will preserve the settings and outlooks of the key listed buildings. This can be seen on the current draft scheme where every effort has been made to avoid the important view out from Bloomhill House across the site towards Main Street, for example.</p> <p>Biodiversity - An initial walk-over suggests that the site has no obvious ecological interest that</p>		

could be harmed by development. A full Ecological Study is due to be commissioned shortly. The site includes a number of mature, and over mature, trees and the aim will be, following a full Tree Survey and Management Plan, to avoid developing close to the best specimens and to replace those trees that need to be felled due to age and disease with suitable, and at least semi-mature, replacements.

**Green Belt** - While the site falls within the Green Belt, we note that all the sites identified at Cardross are similarly defined. Bloomhill's distinction is that, whilst covered by this designation, it is already an integral part of the settlement rather than an extension of it. Furthermore, there is an obvious alternative, and defensible, boundary for the Green Belt that could follow Carman Road and the outer extent of Cardross Golf Club.

**Existing Settlement** - The site may currently lie outside of the settlement boundary in the Local Plan, but it is clear that it has always historically been part of Cardross whilst on plan and visually it appears as part of the village bounded by existing development (Auchenfroo and Bloomhill), housing along Main Street and Carman Road and the Cardross Golf Club.

**Accessibility** - The site has a good bus link and is within walking distance of all of the services and facilities in Cardross, including the train station.

**Vehicular Access** - Access to the site is available from Main Street, and possibly Carman Road, with Main Street being the easier to deliver and, therefore, the preferred option. A scheme showing how this would appear is included with the submission as a separate report by traffic engineers Woolgar Hunter, which achieves a visibility splay of 50m to the north and 63m to the south. As discussed with the Council's Roads Department, the proposals also include indicative locations for three traffic islands on the southern approach to the village to reinforce the 30mph limit, reduce traffic speed and help to justify what are slightly reduced visibility splays against the Council's normal standards. To deliver an access onto Main Street a short section of wall will require to be removed and replaced by a lower alternative, but this will be executed in a sensitive manner and is more than outweighed by the other benefits that a development of Bloomhill will deliver. Initial study of the relevant wall section indicates that it is of a more recent vintage than parts further along Main Street and appears already to have been much altered and repaired.

#### **Modifications sought by those submitting representations:**

##### **S101 - The Chrystal Family Trust (01658)**

Inclusion of Bloomhill as a housing site and its removal from the green belt.

#### **Summary of responses (including reasons) by planning authority:**

This site was considered along with an adjoining site at the public inquiry in to the last local plan (see Core Document xxxx chapter 16.2.2). At the inquiry, in response to this and other sites the council undertook to carry out a review of the green belt. Accordingly, the Argyll and Bute Green Belt Landscape Study was commissioned from consultant landscape architects Ironside Farrar (see Core Document xxxx). The study was specifically tasked to look at the suitability of the objection sites for development purposes. The study (core document xxxx chapter 5) concluded that the area is of high importance within the green belt, it was assessed against the landscape objectives, physical criteria, qualitative criteria and designations. Appendix 2 of the study shows that this site was ranked joint first in terms of green belt landscape objectives, and equal first in terms of physical, and qualitative criteria, and designations.

The site also forms part of the Cardross Conservation Area, it is surrounded by listed buildings and is also adjacent to the remains of Cardross Old Parish Church, a scheduled ancient monument. The site provides a parkland like setting for Bloomhill which is listed, and contains numerous mature trees which contribute to the character of the conservation area, and to the setting of the old church. The Reporters findings concluded that "we find it difficult

to envisage how the development in housing of either of these attractive open areas of parkland would constitute their preservation or enhancement.”

The site’s north west boundary alongside the access to Glen House and its boundaries with the former church and manse to the south west have significant stands of mature trees. At present these are relatively safe from pressure for removal on the basis of perceived risk to property from tree fall, developing the site would inevitably lead to increased pressure, to fell them, a fact acknowledged by the objectors.

The site extends to 2.1 hectares, which in order to meet the housing requirements identified in the Housing Need and Demand Assessment and based on the estimated capacity of other sites in the village, the Council would normally be seeking to achieve a development density of 25 houses per hectare. The proposed layout shows a mixture of 6 large detached homes and four smaller blocks of sheltered accommodation units, the proposed scheme shows that even with this low density scheme and the developers statement “every effort has been made to avoid the important view out from Bloomhill House across the site towards Main Street”, that the impact on the integrity of the setting of Bloomhill, and the character of this core part of the Conservation Area will be considerable.

### **Conclusions**

The objectors have not demonstrated that the Council’s proposed housing land releases for Helensburgh and Lomond housing market area are inadequate, or that there is any need for additional housing land in Cardross, above that which has already been provided for in the proposed Local Development Plan. In the absence of such a need, and given the adverse effect that the development of this area would have both on the green belt, character of the conservation area and the setting of the listed buildings and ancient monument which surround the site the site is not considered suitable for development and should retain its green belt designation.

### **Reporter’s conclusions:**

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### **Reporter’s recommendations:**

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