

**Delegated or Committee Planning Application Report and Report of handling as required by Schedule 2 of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2008 relative to applications for Planning Permission or Planning Permission in Principle**

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**Reference No:** 11/00213/PP

**Planning Hierarchy:** Local Application

**Applicant:** Adams (Flansham) Ltd

**Proposal:** Change of use of agricultural sheds to firewood processing unit

**Site Address:** Land North West of Camis Eskan Farm House, Helensburgh

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**DECISION ROUTE**

(i) Local Government Scotland Act 1973

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**(A) THE APPLICATION**

**(i) Development Requiring Express Planning Permission**

- Change of use of agricultural sheds to firewood processing unit

**(ii) Other specified operations**

None

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**(B) RECOMMENDATION:**

It is recommended that planning permission be refused for the reasons set out overleaf.

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**(C) HISTORY:**

99/02017/WGS – Proposed mixed woodland planting (No objections 28/12/2000)  
99/02028/DET – Formation of car park and upgrading of access (Withdrawn 21/12/2000)  
01/01423/DET – Conversion of farm buildings to 4 dwellinghouses (Withdrawn 16/11/2001)  
01/02061/COU – Conversion of farm buildings to 4 dwellinghouses, associated parking area and formation of passing places on access road (Approved 06/06/2002)  
04/00954/DET – Alteration and extension to dwellinghouse (Approved 23/07/2004)  
05/00742/DET – Demolition of shed and erection of 2 dwellings (Withdrawn 10/03/2006)

05/00968/PNAGRI – Erection of agricultural building (Permitted development 26/05/2005)  
06/02777/DET – Erection of garage (Approved 03/01/2007)  
10/00367/PP – Erection of 2 agricultural sheds (retrospective) (Approved 11/05/2010)

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**(D) CONSULTATIONS:**

Area Roads Manager (Memos 22.03.2011, 30.03.2011 and 13.07.2011)

The principle of the wood processing unit and the area available space within the site was not a concern. The key question was the potential traffic movements through the residential area. The applicant's in depth explanation of their intend use, confirms that there would not be any more traffic movements than that of the potential for the already approved use of the site. As a result of the information I am now prepared to support this application however, as the proposed use has the potential for other operators to change the strategy and increase traffic movements I would ask if it were possible to restrict the approval to the applicant.

Area Environmental Health Manager (memo dated 01/09/2011) – has requested that a noise assessment be carried out by the applicant in advance of the determination of the application.

*Comment: As there are fundamental green belt policy considerations weighing against this proposal, it would not be appropriate to require that the applicant should go to the expense of commissioning such a study, given the prospect of it being refused on policy grounds, regardless of the acceptability of noise considerations. However, in the event that Members were minded to approve the application, a continuation would be appropriate in order to allow the production of such a study to inform a final decision. .*

Helensburgh Community Council (Letter 17 March 2011) – Proposal is contrary to Policy STRAT DC3 of the Argyll and Bute Structure Plan' 2002.

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**(E) PUBLICITY:** None

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**(F) REPRESENTATIONS:** 17 letters of representation have been received from the following

Helensburgh Green Belt Group – Mr A. McBeth, 40, West Montrose Street, Helensburgh W.G. Connor, West Cottage, Camis Eskan Farm, Helensburgh, G84 7JZ (letter dated 17.03.2011)

A.B. Connor, West Cottage, Camis Eskan Farm, Helensburgh, G84 7JZ (letter dated 17.03.2011)

Charles Carver, Stables Cottage, Camis Eskan Farm, Helensburgh, G84 7JZ (letter dated 16.03.2011)

Dee and Lynne Duncason, 5 Camis Eskan Farm, Helensburgh, G84 7JZ (letter dated 17.03.2011)

William Wilson, Tigh na Mara, Camis Eskan, Helensburgh (letter dated 17.03.2011)

Eric Thompson, North Lodge, Camis Eskan, Helensburgh, G84 7JZ (letter dated 16.03.2011)

Donald Mayer, 9 Collins Road, Colgrain, Helensburgh, G84 7UA (letter dated 25.03.2011)

Norrie McNaught, 33 Drumfork Road, Helensburgh (letter dated 27.03.2011)

Liz McNaught, 33 Drumfork Road, Helensburgh (letter dated 27.03.2011)

Mrs J. Lloyd (no address) (e-mail dated 25.03.2011)

M.J. Carr, (no address) (e-mail dated 25.03.2011)  
Emma Flett (no address) (e-mail dated 25.03.2011)  
George Newlands (no address) (e-mail dated 28.03.2011)  
Mr & Mrs Court, 7 Collins Road, Helensburgh, G84 7UA (letter dated 28.03.2011)  
John and Audrey Hayward (no address) (e-mail dated 05/04/2011)  
Mrs E.L. Yates, 29 Redgauntlet Road, Helensburgh, G84 7TR (e-mail dated 12.04.2011)  
Andrew Nisbett (no address) (e-mail dated 18.04.2011)

**(i) Summary of issues raised**

- a. The proposal is contrary to the provisions of Policy STRAT DC3 of the of the Argyll and Bute Structure Plan 2002 as –

This application is not for an agricultural-related development

This application is not related to farm diversification

This application is not for outdoor sport or recreational development

The other categories, numbers (A) 4 – 6, pertain to natural heritage, access resources, alterations and extensions to buildings and a change of use of existing buildings.

None of these categories has any connection with this planning application.

STRAT DC 3 goes on to list “(B) Exceptional cases of development outwith categories (A) 1 – 6. According to the strategy, these cases need to successfully demonstrate that the proposal will either retain a significant building at risk, directly support the provision of vital infrastructure or involve building development directly supporting recreational use of land.

The current planning application bears no relation to the “exceptional cases” listed in STRAT DC 3.

STRAT DC 3 concludes at (C) “Developments which do not accord with this policy are those outwith the categories (A) 1 – 6 and (B) above.”

As the planning application does not accord with any of the categories of permissible development described in (A) 1 -6 and (B) above, it does not comply with compatible Greenbelt zoning and is therefore contrary to STRAT DC 3.

*Comment – See my assessment*

- b. It is clearly evident that the raw materials for this operation will have to be brought in by road, with large lorries arriving with felled trees to offload and other vehicles using the same route to collect the finished articles. By virtue of the fact that it is proposed to use 2 large barns then this will be a large scale operation. The only roads leading to and from this location are relatively narrow and encompass a one-way system. They have 2 schools en-route, which clearly will have plenty of children and parents using the route to their respective schools. Safety of local children must be a major concern and the roads on the estate were never intended for this sort of use.

*Comment – See my assessment.*

- c. Colgrain Primary access at Redgauntlet Road has school crossing staff assistance there for the children, and their parents park on the roadway seriously reducing access at these times. The older children attending Hermitage Academy use the whole route to walk to and from school and to

and from the local curry club at lunchtime. It is inconceivable to consider this usage with access as described above.

*Comment – See my assessment.*

- d. Change of use of these lambing sheds will require significantly different vehicular access compared with its current use which involves only herding sheep off the hill. This in turn raises questions about the ownership and adequacy of the access road which is a private road to Camis Eskan farm. This road is still owned by the owner of Camis Eskan farm but is passing its upkeep costs on to the residents of the newly developed Camis Eskan farm properties. The latter residents' agreement would therefore have to be obtained before the firewood processing operation could be allowed to use the road but these residents have neither been 'notified' nor consulted on the proposed change.

*Comment – This is a civil matter between the parties concerned.*

- e. As one of the subject sheds is very large, it has to be assumed that the proposed firewood processing unit will be on a comparably large scale i.e. of sawmill proportions. Therefore, what we are seeing is the thin end of the wedge for development at Camis Eskan under the guise of agricultural use. The processing of cut timber is a noisy operation and if it is on an industrial scale commensurate with the size of the shed and operates on a normal 5 day working week, the anti-social effects of noise on the adjacent residents should be considered. Clearly, it will be significantly louder, more anti-social and more permanent than for the current seasonal use.

*Comment – See my assessment.*

- f. The vibrations felt from a 7.5 ton lorry is disturbing when passing our (7 Collins Road) house so the structural damage to our property is a great concern when the estimated weight of the vehicles passing our property on a regular basis will be approximately 30 tons, possibly even heavier if loaded to a maximum capacity. This is why we are strongly objecting to the planning application.

*Comment – This is a civil matter between the parties concerned. See also my assessment.*

- g. When consent was given for forestry development on this site the condition was that access for timber operations should be via Red Road and not Camis Eskan farm road. No conditions have been set for accessing this firewood processing unit.

*Comment: See my assessment.*

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## **(G) SUPPORTING INFORMATION**

**Has the application been the subject of:**

- (i) **Environmental Statement:** No
- (ii) **An appropriate assessment under the Conservation (Natural Habitats) Regulations 1994:** No

- (iii) **A design or design/access statement:** No
- (iv) **A report on the impact of the proposed development eg. Retail impact, transport impact, noise impact, flood risk, drainage impact etc:** No

Supporting information has been supplied by the applicant setting out the following:

### **Scope of operations**

The tenant's use is unlikely to be exclusive as the owner's own forestry business will probably want to make some use of the yard/shed for storage. The intended uses would be storage of machinery and equipment. The only process on site is production of domestic firewood for subsequent delivery to customers: no footfall sales. The key stages in the process are sourcing timber, seasoning timber, processing into logs, storage and handling of logs, and dispatch to the customer.

### **Sourcing timber**

The prospective tenant already has an existing tree surgery business. Timber would be brought back to the site in small trailers behind 4x4 vehicles and would be relatively low key. In future a further proportion of timber may be sourced from Camis Eskin woods of which there are 100 acres requiring active management. The timber would be brought down to the yard using the internal tracks on the premises. As the business expands it is envisaged that future demand for logs could exceed volumes capable of being sourced from tree surgery arisings and management of the existing woodlands. It is therefore envisaged that that a proportion of timber would be sourced on the open market and brought back to the site. This would normally be by lorry, either articulated or 6 wheel and trailer. Lorry movements are likely to be infrequent and it is not envisaged that more than an average of 1 load will be delivered per week even at maximum future production. Movements would be timed to avoid school runs and during work hours and would be no more onerous than the existing traffic of livestock, farm feeds etc.

### **Seasoning timber**

Hardwood has to season for a period of months before processing and timber lengths would be stacked in the yard.

### **Processing timber**

Timber will be converted to logs either by chainsaw or using a proprietary tractor operated firewood processing machine. There would be various noise sources associated with the process including chainsaws, tractor operation and noise from the saw in the processor. The machine will run in the large shed to allow wet weather working and this will mitigate any noise output from the site. External noise will be generated by tractors, vehicles and chainsaws, but it is envisaged that this will be during normal working hours and their will not be evening operation. None of these noises are alien to the environment at Camis Eskin. We do not know the specific processor but as an example a Palax Combi Processor has an equivalent continuous 'A' weighted sound pressure at the work station of 87.5dB (A) and a sound power level of 102dB (A).

### **Storage and handling**

Storage will be in the yard (timber lengths) or sheds (cut logs).

## **Dispatch**

Cut logs will be dispatched to the customers in small loads either by 4x4 and trailer or possibly small tipper. Dispatch will involve no more than a few loads per working week and will not be every day.

## **Summary**

The proposed use is essentially a continuation of the existing agricultural and forestry designation. The yard and buildings are approximately 150m away from the nearest third party buildings and it is envisaged that the field in between will be planted to offer some screening. This is a new business venture in the area. There would be a slight increase in the general traffic volume but the nature of the proposed use is such that vehicle movements will always be limited by the amount of wood that can be stored and processed in any given calendar year.

## **Additional information**

### Process

The process of preparing wood suitable for domestic firewood for use in either open fires, or enclosed wood burning stoves is a slow operation. Good domestic firewood, that will burn with maximum efficiency in terms of calorific value released and therefore heat generated, requires to be dried to a moisture content of around 20%. At moisture contents above this wood either sparks, and is therefore dangerous, or uses a significant proportion of its energy to dry the wood whilst burning releasing less heat and more emissions that (a) emit more smoke from the process into the atmosphere, and (b) deposit tar residues in the chimney leading to further reduced efficiency and increase risk of chimney fires. Typically hardwood species will be at a green (just cut) moisture content of around 50%. The timber therefore requires considerable drying time until it is suitable for burning. As the firewood to be processed on the site is for sale, then the quality must be good (dry) otherwise the operator will not maintain market share and the business will fail. Drying time will vary depending on species, time of year felled, diameter of timber in the stack, degree of processing, etc, but as a rule of thumb most hardwood will require at least one spring and one summer to dry, with some bigger sections needing 2 years seasoning – the old woodcutters saying is that good firewood had been cut for two Octobers before burning.

The process to be followed on the site is proposed as;

Source wood: Arboricultural arisings, Transport to site: Trailer

Source wood: Purchased roundwood, Transport to site: Lorry

Season: Stack in yard to dry, 6-12 months

Process: Batch process into logs

Store: Store split logs under cover (sheds)

Dispatch: Individual loads delivered to customers by trailer

The primary constraint on production of quality firewood is therefore storage space and this differentiates the process from other types of industrial wood processing where the timber is supplied to the facility on a just-in-time basis, processed and dispatched within a turn around time of 1 – 2 months. Wood in a firewood processing facility would be operating on a turn around time of 1 – 2 years.

## Storage

The site of the planning application is the two existing buildings and associated yard. The yard space extends to approximately 1,750m<sup>2</sup> in front of the sheds and 500m<sup>2</sup> behind the two sheds. This area has to store all the roundwood firewood being seasoned on the site prior to processing. Timber will typically be brought to the site in cut lengths of 2m – 3m in the round. Standard stacking guidelines are for the maximum recommended safe height of a timber stack to be no higher than the length of the stacked product; therefore 3m cut lengths can be stacked to 3m height. A single lorry delivery is 24 tonnes of round wood and requires a linear stacking space of 10m at 3m height, therefore to store 10 lorry loads a footprint of 100m length is required, with working areas either side, etc. The stacked footprint is 300m<sup>2</sup>, with the same area free for working around the stack. Based on the available yard space the total area is 2,250m<sup>2</sup>. Each 240 tonnes stored requires around 600m<sup>2</sup> space including working zones, therefore the maximum available yard space supports  $2,250/600 = 3.75 \times 240$  tonnes = 900 tonnes. This would represent saturation point in terms of roundwood storage on the site.

As the timber is processed it can be stored undercover as split logs. Split logs irregularly stacked (piled) have a loose density (volume) of approximately 45% of their solid density due to voids of air within the pile. This means that 1 tonne of roundwood will convert to 2.2m<sup>3</sup> of split logs after processing. Within the site it is envisaged that the entire small shed and approximately half of the large shed will be capable of storing processed logs awaiting dispatch to the customer. The small shed is 151m<sup>2</sup> and the large shed is 474m<sup>2</sup> in total, or 236m<sup>2</sup> if you take half (the other half is required for the firewood processor and machinery storage).

Assuming a safe stacked height of 2m the total loose volume of split logs in the small shed would be 300m<sup>3</sup> or 136 tonnes of roundwood before processing. Assuming a safe stacked height of 3m the total loose volume of split logs in half the large shed would be 700m<sup>3</sup> or 320 tonnes. Based on these calculations, the maximum expected capacity of the site if all areas were full would be 900 tonnes of round wood and 450 tonnes of split wood totalling 1,350 tonnes. If all this wood were delivered to the site by lorry it would represent 56 lorry movements. In the application the maximum intensity was rounded down to an average on one movement per week or 52 per annum. It is also highly unlikely that all areas would ever be full to capacity.

## Intensification

During the course of the application we consulted with the Roads Department about the intensity of lorry movements into the site. At the time discussions suggested that an average of one lorry per week was not problematic, this being no different than the current intensity of refuse collection. In the supporting documentation we also undertook to avoid weekend, out of hours or school run time deliveries to ensure minimum disruption to residents. The proposal as currently tabled is therefore not contentious on roads grounds.

An intensification of the use of the facility could of course generate considerable traffic. However, the process of seasoning and storing firewood is slow and requires a large area to support even a low throughout operation. At the Camis Eskan site, even if additional processing capacity is brought onto site, there is no potential for intensification as the key determinant is available storage space and therefore capacity on the site is effectively self regulated.

The calculation for roundwood stacking takes account of adequate working area between adjacent stacks. The site cannot accommodate one continuous stack, so space must be left for a tractor to turn around in between stacks. Therefore 3 metres between stacks would not be enough. Also, the stacks will necessarily be dismantled in the order they were erected i.e. first in = longest drying time = first out. This is why the free area is approximately the same as the stacked area.

Of course lorry loads won't necessarily all arrive at one week spacing. That is why we have said at an average of 1 per week, not at one per week. There may be 4 loads and then nothing for 2 months, etc. But this doesn't mean we can bring in or store any more wood on the site. Stocking up to 900t would be gradual. Hardwood availability is the limiting factor - it is not usually produced in large volumes as it is normally a by-product of conifer clear felling. Very unlikely we could go and source 900t at one time in the whole of the UK.

The existing farm sheds have the potential to generate a similar level of traffic movement under their current planning classification, by way of agricultural supplies being delivered and agricultural produce being dispatched. It is safe to say that the current proposal would generate no greater traffic movements than the existing use.

I can confirm that it is not the intention for the firewood to come from Camis Eskan, and indeed that is not physically possible as there is simply not enough hardwood woodland there. A small proportion **may** end up coming from Camis Eskan over a sustained period, but the purpose of the application is to allow the processing of wood into firewood sourced from wherever it can be economically and legitimately sourced. This may be from the prospective tenant's tree surgery business as aboricultural arisings, this may simply be purchased by the tenant, or some of this may be as a result of woodland management on Camis Eskan.

We do not need any new agricultural buildings to replace these two sheds, nor have we asked for any. Our intention is simply to make good use of the two existing sheds rather than having them lie redundant and unoccupied.

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**(H) PLANNING OBLIGATIONS**

(i) **Is a Section 75 agreement required:** No

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**(I) Has a Direction been issued by Scottish Ministers in terms of Regulation 30, 31 or 32:** No

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**(J) Section 25 of the Act; Development Plan and any other material considerations over and above those listed above which have been taken into account in the assessment of the application**

(i) **List of all Development Plan Policy considerations taken into account in assessment of the application.**

'Argyll and Bute Structure Plan' 2002

STAT SI 1 – Sustainable Development  
STRAT AC 1 – Development in Support of Farms, Crofts and Estates  
STRAT DC 3 – Development within the Greenbelt

Argyll and Bute Local Plan' 2009

LP ENV 1 – Impact on the General Environment  
LP ENV 19 – Development Setting, Layout and Design  
LP BUS 2 – Business and Industry Proposals in the Countryside Development Control Zones  
LP TRAN 4 – New and Existing Public Roads and Private Access Regimes  
LP TRAN 5 – Off-Site Highway Improvements



Appendix A – Sustainable Siting and Design Principles  
Appendix C – Access and Parking Standards

- (ii) **List of all other material planning considerations taken into account in the assessment of the application, having due regard to Annex A of Circular 4/2009.**

Argyll & Bute Sustainable Design Guidance (2006)  
Scottish Planning Policy 2010

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- (K) **Is the proposal a Schedule 2 Development not requiring an Environmental Impact Assessment:** No
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- (L) **Has the application been the subject of statutory pre-application consultation (PAC):** No
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- (M) **Has a sustainability check list been submitted:** No
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- (N) **Does the Council have an interest in the site:** No
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- (O) **Requirement for a hearing (PAN41 or other):** Although 17 representations have been received, given that these are objections which accord with the recommendation for refusal, it is not considered necessary to hold a discretionary hearing in that circumstance, as it would not add value to the decision-making process.
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- (P) **Assessment and summary of determining issues and material considerations**

Planning permission is sought for the change of use of 2 agricultural sheds to a firewood processing unit. The site is in open countryside north-east of Colgrain in the Greenbelt. A number of key issues need to be addressed, namely whether there is a locational need for this development in the Greenbelt, whether it is an appropriate use, and what impact it will have on adjoining properties and the surrounding area.

Structure Plan Policy STRAT SI Sustainable Development, *inter alia*, seeks to maximise the opportunity for local community benefit, make efficient use of brownfield land, conserve the natural environment and respect the landscape character of an area and the setting and character of settlements. PAN 73 – Rural Diversification advises that

*“... we should not lose sight of the intrinsic rural character that makes our countryside attractive to live and work in. Traditional sectors like farming and forestry are essential in retaining this rural character but these are changing too. Agricultural diversification has meant farmers concentrating on new areas of agriculture, growing alternative crops, rearing new breeds and turning to organic farming. Farm diversification has involved farming families adapting even further and turning their skills to new businesses secondary to the main farm business. These enterprises may be an extension of the existing farm business but equally the new activity can be unrelated to agriculture. Farm diversification is therefore an integral part of wider rural diversification that enables farmers and their families to continue the farming activity while providing jobs and income for others in the community.”*

The application site is within the Greenbelt which is a special and more restricted form of Countryside Around Settlement zone. Its main function is to maintain settlement separation and to prevent urban sprawl. An ancillary function is to provide an attractive setting for settlements. Policy STRAT DC3 of the of the 'Argyll and Bute Structure Plan' 2002 deals with development within the Greenbelt. It states that encouragement will only be given to very limited and specific categories of countryside based development. These comprise:

- 1 Agricultural related development
- 2 Farm diversification – tourism related development
- 3 Outdoor sport and recreational development
- 4 Development required to manage and sustain the natural heritage and access resources of the Greenbelt
- 5 Demolition and replacement of buildings and alterations or extensions to buildings, including dwellinghouses, subject to no change of use occurring
- 6 Change of use of buildings, including alterations and subordinate extensions of such buildings to residential institutional use (Use Class 8 B and C)

The Town and Country Planning (Scotland) Act 1997 contains a number of definitions. Under 'agriculture' it includes land for woodlands where the use is ancillary to the farming of the land for other agricultural purposes. In this case the proposal is for a new business separate from the farm operation and a new planning unit will be created. This application is not related to farm diversification and is not for outdoor sport or recreational development. The other categories pertain to natural heritage, access resources, alterations and extensions to buildings and a change of use of existing buildings to residential institutional use, none of which are relevant in this case.

STRAT DC 3 goes on to list "(B) Exceptional cases of development outwith categories (A) 1 – 6. According to the strategy, these cases need to successfully demonstrate that the proposal will retain a significant building at risk, directly support the provision of vital infrastructure or involve building development directly supporting recreational use of land. The current planning application does not relate to the "exceptional cases" listed.

STRAT DC 3 concludes at (C) "Developments which do not accord with this policy are those outwith the categories (A) and (B) above."

In the applicant's supporting statement it is indicated that he has an existing tree surgery business. Timber would be brought back to the site in small trailers behind 4x4 vehicles. In future a further proportion of timber may be sourced from Camis Eskin Woods of which there are 100 acres requiring active management. The timber would be brought down to the yard using the internal tracks on the premises. As the business expands it is envisaged that future demand for logs could exceed volumes capable of being sourced from tree surgery arisings and management of the existing woodlands. It is therefore envisaged that that a proportion of timber would be sourced on the open market and brought back to the site.

Where new build is proposed in the Greenbelt, an assessment has to be made in terms of whether it will be visually intrusive. Where no justification exists then the development is taken to have a detrimental visual impact. In this case it is complicated by the fact that that the business proposes to utilise two existing sheds. Therefore, any visual impact will be limited as it utilises an existing built form.

In terms of site specific criteria, the proposal is a potential 'bad neighbour' in that the operations do involve noisy activity. However, the site is some 150 metres from the nearest third party dwelling. Environmental Health has been consulted and at the time of writing a reply is awaited.

The Area Roads Manager raised concerns regarding the ability of the local road network to handle the proposed operation, particularly if it becomes successful and the use intensifies. The principle of the wood processing unit and the area available space within the site was not a concern. The key question was the potential traffic movements through the residential area. The applicant's in-depth explanation of their intended use confirms that there would not be any more traffic movements than that of the potential for the already approved use of the site. As a result of the information, the Area Roads Manager is now prepared to support this application. However, as the proposed use has the potential for other operators to change the strategy and increase traffic movements, he has asked if that if the application were to be approved it should be a personal permission limited to the current applicant.

In conclusion, there are arguments both for and against the proposal. In terms of the former, use of land for woodland is included within the definition of 'agriculture' which is itself recognised as a legitimate Greenbelt land use. Secondly, the proposal is to utilise existing buildings thus not adding to the built form. With regard to the arguments against, the use of land for woodland has to be ancillary to the farming of land. This is a new planning unit being created which will operate separately from the existing farming unit. Secondly, while the proposed use will utilise wood from the immediate area, it will also process wood from elsewhere. As such, it is not considered that it necessarily requires this specific location to operate successfully, as timber will be transported to the premises, wherever it is located.

Taking into account all of the above points, it is considered that no special circumstances are apparent in this case that would justify a departure from Greenbelt policy. A site specific justification has not been established requiring a location within the Greenbelt. As such the proposal is contrary to Structure Plan Policy STRAT DC3, which states that encouragement will only be given to very limited and specific categories of countryside based development. It is recommended therefore that planning permission be refused.

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**(Q) Is the proposal consistent with the Development Plan: No**

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**(R) Reasons why planning permission or a Planning Permission in Principle should be refused**

It is considered that a site specific justification has not been established and that the development does not require to be located within the Greenbelt. As such the proposal is contrary to Structure Plan Policy STRAT DC3, which states that encouragement will only be given to very limited and specific categories of countryside based development.

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**(S) Reasoned justification for a departure to the provisions of the Development Plan**

N/A

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**(T) Need for notification to Scottish Ministers or Historic Scotland: No**

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**Author of Report: Howard Young**

**Date: 01.09.2011**

**Reviewing Officer: Richard Kerr**

**Date: 02.09.2011**

**Angus Gilmour  
Head of Planning & Regulatory Services**

## **REASONS FOR REFUSAL RELATIVE TO APPLICATION REF. NO. 11/00213/PP**

1. The application site lies within the Helensburgh and Cardross Greenbelt as defined in the 'Argyll and Bute Structure Plan' 2002. Within this area, permission will not be given except in very special circumstances for development for purposes other than those related to agriculture, farm diversification, tourism, outdoor sport and recreation, development required to manage and sustain the natural heritage and access resources of the Greenbelt, demolition and replacement of buildings and alterations or extensions to buildings, including dwellinghouses, subject to no change of use occurring and change of use of buildings, including alterations and subordinate extensions of such buildings to residential institutional use. No such special circumstances are apparent in this case. It is considered that a site specific justification has not been established and that the proposed development does not require to be located within the Greenbelt at this location. As such, the proposal is contrary to Structure Plan Policy STRAT DC3, which only gives encouragement to very limited and specific categories of countryside based development.