

## Representation on the Finalised Draft Local Plan

### Helensburgh Green Belt Group (HGBG) representation on the 2005 ABC Finalised Draft Local Plan (Draft LP)

12.7.05

The Helensburgh Green Belt Group (HGBG) asks that the following observations be considered in regard to the Argyll and Bute Council (ABC) Finalised Draft Local Plan (Draft LP).

The present HGBG submission concerns countryside and the Green Belt only and covers the Helensburgh and Rhu Green Belt and countryside, not those parts to the east of Ardmore Point.

The HGBG will wish to appear or be represented at any Public Local Inquiry.

#### 1. General

##### SUPPORT

The Helensburgh Green Belt Group (HGBG) applauds the Finalised Draft Local Plan (Draft LP) as a substantial improvement on the 2003 Consultative Draft Local Plan. It is clearer and easier to read than 2003 Consultative Draft. It is consistent with the approved Structure Plan. HGBG also notes that there is a policy of ensuring minimum incursion into the Green Belt and we welcome that. We also appreciate the Council's responsiveness to earlier submissions. We consider that this is a responsible, forward-looking plan which leaves open the opportunity for long-term, vision-based thinking and, as a result, we mostly support the new Draft LP. The HGBG has a few objections and suggestions. These follow and we hope that they are seen as constructive.

#### 2. Structure Plan detailed policy relevant to the Local Plan

##### OBJECTION

STRAT DC 3 on page 23 of the adopted Structure Plan provides detailed, practical Green Belt policies to which those concerned with a planning application would want to refer. It makes clear the limitations on development in the Green Belt. Since the Local Plan will be the main working document upon which planning applications will be assessed, HGBG considers that the **Draft LP should include that section in full**. The HGBG therefore OBJECTS to its exclusion from the Draft LP.

#### 3. Definition of 'Green Belt'

##### OBJECTION and PROPOSAL

[Glossary]

HGBG objects to the wording of the term Green Belt (Greenbelt) given in the Glossary because it is a description, not a definition. We urge that the SGBA definition be adopted: "Green Belt is designated open land which is around, beside or in an urban area and for which there is a presumption against development, except for specified, mostly rural uses."

## 4. Boundaries

SUPPORT, OBJECTIONS and PROPOSALS [Maps]  
HGBG supports the boundaries of the Green Belt in the Draft LP with the following two exceptions which are therefore OBJECTIONS.

- a. The Draft LP maps should be adjusted to show the inner boundary of the Green Belt to follow the outer edge of settlements and not the seashore. To minimise confusion, we propose that the boundary be green, not a red similar to that used for roads.
- b. It is proposed that a line be drawn from the most northerly point of the Helensburgh reservoirs in a north-easterly direction (parallel to the B832 road) up to the boundary of the National Park and that the area between that line and the B832 be designated as Green Belt. This would ensure that both sides of the main tourist route from the National Park to Helensburgh are Green Belt.

## 5. New AFAs

OBJECTION and PROPOSAL

HGBG suggests that two new AFAs be introduced with a Priority 1 rating. These would be the areas of Green Belt on each side of the eastern and northern approaches to the town and the entry points to the town. They are currently in a deteriorated and worsening condition and give a very bad impression of the town for visitors and residents.

The eastern approach and entry should include both road and rail. The northern approach might start at the civic amenity site (which is unsightly on the main tourist route from the National Park), include the reservoirs area and end within the town boundary. There is a need to rehabilitate and to provide proper, regular maintenance for the Skating Pond.

## 6. AFA 3/5: Green Belt

SUPPORT, OBJECTION and PROPOSALS

- a. HGBG supports the creation of AFA 3/5 and the issues listed for action.
- b. HGBG hopes that this might be raised from Priority 4 rating to Priority 2 because:
  - I. The potential expense of carrying out actions 1 - 6 of Schedule AFA 3/5 would be relatively small.
  - II. Action 7 of Schedule AFA 3/5 is no longer relevant and should be deleted.
  - III. Green tourism advantages to the economy of the town would arise.

Much advance work has already been done by the HGBG and the Helensburgh and District Access Forum which have raised substantial sums already from various grant sources. Based on that work, acquiring further external grants should be possible.

- c. We attach a copy of a paper which HGBG submitted on AFA 3/5 in August 2004.
- d. If it is considered that consultants have a part to play on specific issues, then we propose that their remit should be agreed with local groups which should also play a part in project management. The same should apply in seeking external funding and in contracting practical work such as paths construction for which the Access Forum has demonstrated competence.

## 7. Hermitage Academy

### NON-OBJECTION

HGBG does not object to the location of the new Hermitage Academy on a Green Belt site to the east of the town.

## 8. Environment

### SUPPORT, OBJECTIONS and PROPOSALS

[Ch. 5]

Generally we commend the Draft LP for doing what is required under existing legislation and guidance. We have the following objections:

- a. HGBG objects that the Key Environmental Features (KEFs) are only identified in the most general terms in the Supplementary Information and Guidance. We propose that discussions are held with local groups, using the HGBG's and the Community Council's lists of KEFs as a starting point.
- b. Paragraph 5.2. We consider that the Citizens Panel is no substitute for local community involvement.
- c. Paragraph 5.2. HGBG urges that a Countryside Ranger Service be introduced.
- d. Policy LP ENV 1, item (G): There should be mention of the Local Nature Reserve designation. (Also in the Glossary and the maps.)
- e. Policy LP ENV 2: It is essential to clarify which species and habitats are of local importance. While the Biodiversity Action Plan and the Environmental Report associated with the Draft LP might be expected to provide these, in reality they are very selective and do not provide an adequate coverage of the countryside around Helensburgh. More work, in partnership with local groups, is needed to identify those which are of local importance.
- f. Policy LP ENV 4: The omission of the Local Nature Reserve is surprising.
- g. Policy LP ENV 7: Prize features should include recreational value for residents / visitors and the amenity value of woodlands.
- h. Policy LP ENV 20: While supporting this policy, this paragraph might be expanded to indicate how it will be applied and how it affects the countryside.

## 9. Development and farm diversification in Green Belts

### SUPPORT and OBJECTION

HGBG supports the Green Belt statements in LP RET 4, and LP TOUR 1 which are consistent with STRAT DC 3, item 2 on page 23 of the Structure Plan, limiting farm diversification in the Green Belt to tourism-related development. We propose that LP BUS 2 makes clear the exclusion of Green Belt for business and industry and that LP REN 1 and 2 should have similar clauses.

## 10. Business / industry and the Green Belt to the east of Helensburgh

### NON-OBJECTION

HGBG does not object to the Draft LP's designation of 2ha. of land to the east of Helensburgh for business/industry, and we would not object to a further 1ha. as long as it is sited sensitively and away from main roads. We would contest anything in excess of that in the Green Belt for the reasons that follow.

- Helensburgh has a good employment rate and does not need large scale businesses
- Such additions would adversely affect the character of Helensburgh which is essentially a residential town and retail / service centre for the district

- Helensburgh's Green Belt/countryside is an asset to both residents and tourism and needs to be safeguarded.

We SUPPORT deletion from the Draft LP of:

- The site formerly numbered BI-AL 3/2 near Ardmore Point
- The site formerly numbered PDA 3/8 near the northern entry to the town

## 11. Housing and the Green Belt

SUPPORT and OBJECTIONS

[Ch. 7]

Rather than go into technical details about population and housing here, we refer to the Helensburgh Study Group's analyses which HGBG records as objections here.

The HGBG supports the deletion of 'areas of search' from the Draft LP.

The HGBG supports item (B) 4 of policy LP HOU 1, but it might be made clear that this presumption against development is against large and medium scale housing as well as small scale housing.

The Draft LP does NOT take up the permitted Green Belt land for 50 new affordable units referred to in the approved Structure Plan. We note that fact and record our previous position that we have accepted that allowance.

## 12. Recreation and the Green Belt

OBJECTIONS and PROPOSALS

[Ch. 9]

- Distinction between indoor and outdoor recreation.* Recreation is not defined in the Draft LP Glossary. We propose that wherever recreation is mentioned it should be made clear whether indoor or outdoor recreation is intended since there are important development implications in the distinction.
- Recreation in the Green Belt.* Development in the Green Belt should specifically be limited to outdoor recreation, except where farm buildings have been converted for tourism reasons.
- Recreation at the reservoirs area.* The HGBG contends that the reservoirs area is a crucial site for tranquil outdoor recreational purposes, both for residents and for visitors. It is located at a point of fine scenic attraction, at the natural meeting point for the town's evolving paths network and the developing path links (foot and cycle) between Helensburgh and the National Park.

We propose:

- I. that the reservoirs area be designated as a Key Environmental Feature;
- II. that the land between the reservoirs and the National Park boundary be designated as a Key Environmental Feature;
- III. that the reservoirs area be designated for tranquil outdoor recreation;
- IV. that the reservoirs area and land between it and the National Park be debarred from built recreation, travelling shows, fun fairs, use by motorised vehicles and any housing, business or other development with the possible exception of a discreetly-located hotel.

The HGBG could support the proposal for a discreetly-located hotel at the reservoirs site as long as it gets set well away from the main road and is of a design which is sympathetic to the surroundings. Bearing in mind the increasing emphasis on local involvement in planning, this is a clear example of a case for the involvement of the HGBG prior to a planning application being framed or submitted.

### **13. Good design applied to the countryside**

#### **OBJECTION**

Good design applies to the countryside and landscaping as well as to urban areas. We suggest that this is made clear.

### **14. Open Space Protection Areas**

#### **SUPPORT, OBJECTIONS and PROPOSAL**

The HGBG supports those Open Space Protection Areas (OSPAs) which have been designated on the map. It welcomes the inclusion of the Blackhill Plantation on either side of Sinclair Street. However, it objects to the omission of the reservoirs area and those areas which are already part of the paths network being created by the Access Forum. There are two areas of woodland on Helensburgh Golf Course which straddle the Old Luss Road. They should be designated OSPAs. It is proposed that discussions be initiated with local groups to finalise the OSPAs along with KEFs.

### **15. Sustainable development in a countryside context**

The HGBG agrees with the Helensburgh Study Group's comments and draws particular attention to their application in the countryside.

### **16. Community involvement in planning**

The HGBG agrees with the comments by the Helensburgh Community Council and the Helensburgh Study Group on this issue. The HGBG considers that local groups such as the HGBG should be especially involved when countryside matters are at issue.

### **17. Planning gain, enforcement, departures, monitoring, retrospective permissions**

The HGBG agrees with the Helensburgh Study Group's comments on these.

### **18. Radio telecommunications masts / base stations**

#### **SUPPORT and OBJECTIONS**

HGBG broadly supports the spirit of LP TEL 1, section (iv), but too much depends on interpretation of the word 'unacceptable'. Unacceptable to whom? As the ABC planning arrangements are operated at present that could mean unacceptable to the Planning Control Officer or, if referred to the Area Committee, then unacceptable to that Committee. However, NPPG 19 (paras. 10, 40, 59 and 70) and item 1 of the Operators' code add the extra factors of public concern and consultation with the local community. The HGBG does not have an automatic resistance to telecommunications in the Green Belt if well concealed and/or well away from public places, paths and roads, not on the skyline, etc. Indeed, on two occasions it has recommended appropriate Green Belt sites to operators. However, we object to the omission from LP TEL 1 of advance consultation with local community groups and the public before a planning application is submitted.

We also object to omission of avoiding locally-determined Key Environmental Features. (See joint Helensburgh organisations paper *Radio Telecommunications Masts in and around Helensburgh and Rhu, 2005.*)

## 19. None

## 20. Area Capacity Evaluations (ACEs) for Sensitive Countryside

### OBJECTION

Appendix E: the HGBG objects to the facility seemingly given to developers to sidestep the controls relating to Sensitive Countryside and to be able to introduce medium and large scale developments there by the device of an ACE. We agree with the Study Group's submission on this issue.

## 21. Paths

### OBJECTIONS and PROPOSALS [AFA 3/5 and item 3(e) on pages 74-75]

Although access networks within the Green Belt are discussed in Schedule AFA 3/5, the low priority (wrongly) given to it means that action is unlikely, despite the relatively low costs and the considerable work already carried out by the HGBG and the Helensburgh and District Access Forum. The HGBG considers that more specific encouragement should be given to the topic related to health and tourism and, specifically, the long distance walking projects should be included on pages 74-5, item 3(e). Also in 3(e) there should be mention of local access groups, as distinct from, but liaising with, the proposed single 'local' access forum – which, of course, will not be local at all.

Support for the concept of an Access Forum, but there needs to be much greater clarity about its terms of reference, responsibilities and membership. Also, one forum for the whole of A&B is unlikely to meet local situations satisfactorily unless supported by a network of 'local access groups' which know the terrain and local needs. Such groups could be genuinely local, e.g. more local than the Administrative Areas.

## 22. The maps

### OBJECTIONS and PROPOSALS

The HGBG makes the following objections and proposals. It should be noted that some of the following repeat points made earlier in this submission, but they are brought together with regard to the maps.

- Sites of Importance for Nature Conservation should be delineated on the maps.
- Local Nature Reserves should be marked on the maps.
- The Green Belt boundary should follow the outer edge of the town and should be coloured in such a way (e.g. green) as to distinguish it from roads.
- The reservoirs area should be designated as an Open Space Protection Area.
- It is proposed that a line be drawn from the most northerly point of the Helensburgh reservoirs in a north-easterly direction (parallel to the B832 road) and the area between that land and the B832 designated as Green Belt. This would ensure that both sides of the main tourist route from the National Park to Helensburgh are Green Belt.
- There should be two new AFAs relating to the eastern and the northern Green Belt approaches to the town and entry points.

- Infill and rounding off are not necessarily desirable. By contrast, a jagged edge to the town (with green fingers or green corridors) is preferable to maximise access to the Green Belt and for wildlife mobility.

## 23. Tree Preservation Orders (TPO's)

### OBJECTIONS and PROPOSALS

Object to the exclusion of the following established TPOs:

- Throughout the Blackhill Plantation. This was designated by Dumbarton District Council in 1986.
- On the Golf Course at the plantation part way up the Old Luss Road.

The following appear not to have TPO's at present but the possibility of introducing them might be discussed with us. We are aware that woodland management has to be taken into consideration, but since TPO's are a recognition of the importance of certain woodlands, an investigation into the most appropriate designations would seem to be desirable.

- The Duchess Wood (a Local Nature Reserve)
- Garraway Glen (a SINC)

## 24. Sites of Importance for Nature Conservation

### OBJECTION and PROPOSAL

Sites of Importance for Nature Conservation (SINCs) should be included territorially on the statutory maps (as the current, 1999, Local Plan provides-) and not presented as dots on maps in a document which is not easily available to the public (the SIG). All SINCs in existence at present should be continued. We suggest that discussions be held with interested local groups to determine if other SINCs might be included.

Some local SINCs have either been excluded or have been wrongly named. Number 17 on the list is missing from the map. Number 20 should be entitled 'Red Glen' (not 'Camis Eskin Glen'). The Ardencaple Wood and Plantation appear to have been omitted. Also, although the Blackhill Mire is there, the two arms of the Blackhill Plantation have been left out.

## 25. Waste Management Sites

### OBJECTION and PROPOSAL

On a map in the Supplementary Information and Guidance, the whole of the depot area at top of Sinclair Street and the whole of the civic amenity site extended to opposite the Skating Pond have both been designated in their entirety as Projected Waste Management Sites. We are informed that this was a mistake. ***We agree with the Helensburgh Study Group's request that a correction be given in writing and that a clear statement be made to us about the intentions of ABC in that area.*** We also suggest that corrected waste management sites be marked on the statutory maps. We further object to the designation of the depot area as 'Settlement Zone' on the statutory maps without indicating its current or future use.

The HGBG also ***requests discussions with Council officials responsible for these waste management sites.***