

# RHU & SHANDON COMMUNITY COUNCIL

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16 December 2015

Dear Mr Lee,

## **Planning Application Ref: 15/02729/PP**

### **Ardenconnel Field: Installation of 3G Synthetic Surface, 8 Floodlights & Wire Perimeter Fence**

I write on behalf of Rhu and Shandon Community Council (R&SCC), a statutory consultee, with regard to the above planning application for the replacement of the existing open grass playing field with a fenced, locked and floodlit synthetic surface 3G pitch.

We have had an opportunity to review the new design in meetings with the Applicant and his specialist pitch designer and have directly contacted the residents most likely to be impacted by the proposal and also consulted the wider local community. A sample survey indicated that of 36 responses 6 supported the proposals whilst 30 either objected or put conditions on any acceptance. We approached several local organisations of which one was enthusiastic for the changes, one definitely against, and the rest were neutral or did not express an opinion.

We would ask you to consider the following points:

1. Open Space Protection Area. Ardenconnel Field is designated as an Open Space Protection Area within A&BC's Adopted LDP 2015. There is a presumption against development of these Open Spaces. SPP states that account must be taken of community value and accessibility of all designated open spaces. It goes on to specify that open spaces should be accessible, safe, welcoming, appealing, distinctive and well connected and concludes by noting that open spaces within Settlements should ensure that they can be used by everyone regardless of age gender or disability. The proposed development clearly contravenes both the letter and the spirit of Scottish and A&B planning policy and guidance regarding Open Spaces.
2. Conservation Area. **LDP ENV 17 - Development in Conservation Areas, etc.** This policy states that "there is a presumption against development that does not preserve or enhance the

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character or appearance of an existing Conservation Area or its setting." Obviously the construction of this highly engineered structure, a synthetic pitch surrounded by rigid 6m high fencing and eight 15m high lighting pylons, does nothing to preserve or enhance the character of the existing semi-rural, open green space within our Conservation Area. In our opinion this contravention alone justifies the refusal of this application.

3. Loss of Amenity to the wider local community. The Applicant has confirmed that the new development will be locked. Consequently the current long-established free access to the open field will be denied and only registered organisations and sports teams would in future be allowed to hire the facility after paying both an annual registration charge and a per session booking fee. Our consultation with local groups found that, with the exception of Rhu Amateurs Football Club, there was little or no interest in meeting the Applicant's conditions and charges to access the proposed facility. (The accessibility of the facility to Rhu Amateurs is questionable as the Applicant has stated that block bookings will not be permitted by civilian teams.) Rhu Gala has been held on the current field site for 12 years but due to the Applicants stipulation that there can be no vehicular access, no penetration of the synthetic pitch surface and no animals would be permitted within the fenced area, this development will preclude any future community events from being held on this field. The proposed high fencing and single narrow gateway will present a serious safety hazard for any local community event involving large numbers of people.
4. Loss of Amenity to local residents. The proposal to introduce a 3G artificial surface and floodlighting will allow the new facility to be used outside normal daylight hours. The Applicant intends that there will be an increase in evening and winter use of the facility. However the likelihood of this use being by Rhu and Shandon Groups other than the Rhu Amateurs Football Club is slight so much of the usage will be from outside the village. Consequently this has the potential to increase nuisance to adjacent and surrounding properties with additional noise and light pollution of a previously dark area, whilst providing small benefit to the village.
5. Vehicular Access and Parking. The existing facility has very poor traffic access and few parking spaces. The speed limit increases from a traffic-calmed zone of 20 mph in Cumberland Road to 30 mph as it enters the small private access road. This runs immediately in front of the local Scout Hut. There is considerable concern at the increased traffic flow past a facility used several times a week by local children, especially given that a lot of this increased traffic will be at dusk or after sunset. There is very limited parking available next to the playing field with the provision of only 20 places deemed insufficient for two rugby teams numbering 30-40 players and others... There is no suitable overspill parking available on Cumberland Road or elsewhere within the village. Parking provision does not meet the normal requirements for a similar sports venue and any increase in usage will therefore exacerbate an already unacceptable situation. It is suggested that a minimum requirement should be a traffic impact assessment to confirm that access and parking are appropriate. We would refer you to Mr Andrew Nisbet's objection for further information.
6. Considering the above we feel that the following policies of Argyll and Bute Council have not been complied with:
  - a. Within the SPP, Open Space Audits and Strategies: "presumption against development, open spaces should be accessible, safe, welcoming, appealing, distinctive and well connected. Within settlements there should be spaces that can be used by everyone regardless of age, gender or disability."

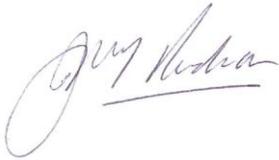
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- b. LDP ENV 17, Development in Conservation Areas and Special Built Environment Areas: "There is a presumption against development that does not preserve or enhance the character or appearance of an existing or proposed Conservation Area or its setting, or a Special Built Environment Area."
- c. LDP STRAT 1, (h), (i), require conservation and enhancement of the natural and built environment and respect to the landscape character of an area.
- d. LDP 9, A, B, C: design of developments and structures shall be compatible with the surroundings. Particular attention shall be given to form and design details, etc.

For the reasons listed above R&S CC concludes that, although the Applicant's proposal would produce an all-weather facility, this would be predominantly for the Applicant's benefit. The chosen location actually provides no significant benefit to the general community of Rhu and Shandon but will increase the level of nuisance to the adjacent residents. Finally it fails to "protect or enhance" the area and environment which is guaranteed by its status as an Open Space Protection Area within the Rhu Conservation Area.

In short R&S CC do not believe this proposal to build what will be a large, unsightly and highly engineered structure in place of an open green space within a Conservation Area is justifiable. The impact on the semi-rural landscape, setting, the extra traffic on an inadequate road and reduced accessibility plus potential bad neighbour consequences clearly do not comply with Argyll & Bute development policies. We recommend that the application be refused.

Yours sincerely,



Jack Rudram,  
Convenor, for Rhu & Shandon Community Council

*By email copy to:  
Cllr Maurice Corry, Cllr George Freeman, Cllr Robert McIntyre  
Members of R&S CC*