



Argyll and Bute

Proposed Local Development Plan

Representation Form

We would like your views on any of the issues, policies, sites and proposals set out in the Argyll and Bute Proposed Local Development Plan and also on the Plan's supporting documents, including the Draft Supplementary Guidance.

This form should be used for **all** representations. The Planning Authority **will only accept** responses using this form. On line and electronic versions are available at www.argyll-bute.gov.uk/ldp as well as guidance notes.

Please use a separate form for each individual aspect of the Proposed Plan, Draft Supplementary Guidance or other related document you wish to comment on.

Your representation must be received by **29th April 2013 before 5 p.m.**

Please return the form to:-

On line: Submitted directly using submit button
 Electronic copy: e-mail to ldp@argyll-bute.gov.uk
 Hard copy: Post to Development Policy Team, Argyll and Bute Council, Manse
 Brae Offices, Lochgilphead, PA31 8RD or Fax to 01546 604643

1 Please give us your contact details.

Please note that representations cannot be treated confidentially and will be scanned and made available for public inspection, except any information which would be subject to the Data Protection Act 1998. They may also be passed to the Scottish Government's Directorate for Planning and Environmental Appeals in order that they can involve you in any Examination of the Plan.

Only representations that include a name and a method of contact will be validated.

Name: Jack Rudram, Convenor	Organisation Name (if applicable) Rhu & Shandon Community Council
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Address: 21 Queens Point, Shandon, Helensburgh, G84 8QZ

Telephone: 01436 820906, 07901 515208	E Mail: Jack.Rudram@btopenworld.com This helps us reduce costs and improve efficiency
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Agent : N/A	If you provide an Agent's name the Council will direct all subsequent correspondence to your Agent.
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Agent Address: N/A

Agent Telephone: N/A	Agent E Mail: N/A
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Office use only

Rec	Valid	Cusref	Code1	Code2	Code3
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Argyll and Bute Proposed Local Development Plan Representation Form

Please use a **separate** form for **each** issue/site/aspect

2 Please indicate which document you are making a representation on:
Tick **one** box **only**

Proposed Local Development Plan	X	Draft Supplementary Guidance	
Environmental Report		Other (please specify)	

3 Please tell us which part of the above document you wish to make a representation on.
Fill in **all** that apply

Page No(s)	67	Chapter No(s)	8	Paragraph No(s)	8.2
Policy Reference	Housing Allocations		Policy Title		
Site Reference e.g. H3001	H-AL 3/6 & H2006 (Map 6)		Site Name	Shandon - Blairvadach & Shandon - Blairvadach House	

4 Please indicate whether your representation is in support of the document or whether you would wish to see it changed (i.e. your representation is an objection)
Tick **one** box **only**

Support as written			Seek a change/ Objection	YES
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5a Please provide your reasons for supporting or objecting to the matter you have highlighted.

H-AL 3/6 is a housing allocation which has been carried over from the adopted 2009 Local Plan which stipulated 28 units with 25% affordability. The proposed Local Development Plan has increased the number of units to 64.

H2006 is a new housing allocation for 60 units with 25% affordability.

Rhu & Shandon Community Council (R&S CC) object to the increase in units allocated under H-AL3/6, and the new large scale allocation under H2006, on the following grounds:

1. We support and agree the conclusions of the analysis of housing needs, demand and allocations provided in response to this consultation by the Helensburgh Study Group (HSG). In particular R&S CC notes that:
 - a) The number of houses in the Helensburgh & Lomond area allocations is excessive. This is particularly the case when looking at the more localised requirements of Rhu & Shandon.
 - b) The Council's Housing Need and Demand Assessment has self-proclaimed approximations and assumptions and is subject to regular reassessments so that it cannot be used as the sole basis of 10-year allocations in the Development Plan.
 - c) The presumption in the HNDA that 1200 more houses are needed in Helensburgh & Lomond is not borne out by the population changes which appear to indicate a flat population with, if anything, a growing demand for single person households, often for older people, who more often require flats and small houses with easy access to the town centres.
 - d) The allocations to year 5 are the most that should be site-specific and the year 10 projections should be through more general indications. Doubling of the 5 year allocations to make a figure for 10 years in table 2.1 on page 21 of the LDP is an unacceptable oversimplification.

- e) In-town vacant sites and sites due to become vacant are not “windfall” because they are known and should provide housing allocations. These sites are also more suited to the single person and older person accommodation which dominate the needs over the coming years.
 - f) Since population changes by local authorities show increases in the east of Scotland, but decreases of about 3% in the west, including Argyll and Bute, the “generous” allowance of 20% is considered unjustifiable and can be ignored.
2. On the above arguments the allocations of housing to Shandon under H-AL3/6 and H2006 are considered excessive and not supported by the HNDA.
 3. Cumulatively, in the proposed LDP, Shandon housing allocations have increased relative to the 2009 Local Plan by 96 units which is excessive for what is designated a Village (Supplementary Guidance 162) with no facilities such as a school. Combining Rhu and Shandon, and comparing with the 2009 Local Plan the allocation for Rhu and Shandon has increased from 58 to 124. There is in addition planning permission extant for a further 13 out of 16 units approved but still to be built at Kings Point, making a total availability of potentially 137 units, not including windfall sites such as the marina. For the last few years there has been no demand for the existing 13 sites approved at Kings Point, nor for the 28 in H-AL3/6, and the allocation of 30 affordable houses at Aros Road (H-AL3/8 in the 2009 Local Plan) has even been dropped due to lack of interest. Thus the argument that there is a demand for this scale of allocation in Rhu and Shandon is not substantiated by the data available.
 4. When considering the combined impact on facilities such as the local school (Rhu Primary) which is already full with an extensive waiting list, this means a potential overall upwards pressure of some 137 new units on a small village community, and represents an approximately 14% increase in the total number of houses making demands on the facilities of Rhu and Shandon. With no clear provision in the proposed LDP for new school facilities, and no obvious space to expand existing facilities, this increase is excessive and impracticable.
 5. Blairvadach House is a “B” listed building and as such any development in its environs must comply with SG LDP ENV 16(a). From the arguments given below these proposed allocations are potentially contrary to this policy.
 6. The local Blairvadach Outdoor Centre, and we believe the Blairvadach Children’s Home, both make use of the grounds of Blairvadach House as recreational space, and the area around the house also provides important amenity open space away from the main A814 road for local residents. Policy LDP STAT1 paragraph (g) requires A&BC to “Avoid the loss of important recreational and amenity open space”, whilst paragraph (h) requires that built heritage resources are conserved, and paragraph (i) requires that the landscape character of an area and the setting and character of settlements should be maintained. Giving up much of the grounds to housing will remove the access to recreational and open space.
 7. H-AL3/6 has been estimated as an area of approx. 4.4 ha. The 2009 Local Plan allocation of 28 houses would thus, assuming that the whole site was usable, have a housing density of approximately 6.4 units, ie; low density which is compatible with the area round about (eg Broomfield, Queens Point etc). An allocation of 64 units as proposed would give a density of approx. 14.5 units/ha which is medium density. However, looking at Map 6 about one quarter of the area lies to the front of the main Blairvadach House, and developing this would impact the setting of a B-listed building contrary to SG LDP ENV 16(a). Indeed A&BC is reported as having declined planning permission for a single house site in Broomfield Gardens even less intrusive to the setting of Blairvadach House. Also, there is a deep gully running along and down through the west side of the area, and another on the east side, on which building would be unlikely to be viable. Thus the likely “buildable” area could be as little as two-thirds of the total which would increase the proposed 64 units to a density of some 22 units/ha, or high density. Both the medium and high density outcomes would be incompatible and out of keeping with the surroundings, and hence contrary to A&BC’s own policies LDP 3(B), LDP 3(D), LDP 9(A), and LDP 9(B). Note also that SG LDP HOU 1(B) is also contravened in terms of the proposed scale (large scale) of this development in a Village.

8. H2006 has been estimated as an area of approx. 4.7 ha. An allocation of 60 units as proposed would give a density of approx. 13 units/ha which is medium density. However, when looking at the actual site much of it is on steeply wooded ground which is unlikely to be buildable, and there are also areas of extremely boggy ground probably unsuitable for housing. Thus the likely “buildable” area could be as little as half of the total which would increase the proposed 60 units to a density of some 26 units/ha, or high density. Both the medium and high density outcomes would be incompatible and out of keeping with the surroundings, and hence contrary to A&BC’s own policies LDP 3(B), LDP 3(D), LDP 9(A), LDP 9(B). Note also that SG LDP HOU 1(B) is also contravened in terms of the proposed scale (large scale) of this development in a Village.
9. Both H-AL3/6 and particularly H2006 have a lot of mature tree specimens. Their removal for building would reduce the quality and overall appearance and character of the landscape setting and thus be contrary to policies LDP 3(B), LDP 3(C), LDP 3(D) LDP 9(A) and LDP 9(B). Attention is drawn to page 18 of the Argyll & Bute Council Green Belt Landscape Study in which there is a reference to “...dense tree cover defining the character of Shandon which appears..... more like a strip of woodland running along the shores of the Gare Loch, with few houses rather than a village. The mature woodland significantly ameliorates the visual and landscape impact of the large houses”. Thus housing developments of the scale and density of those proposed for Blairvadach will clearly damage the overall landscape setting and sylvan appearance of the village.
10. With respect to H2006, which is heavily wooded and very steep where it abuts on to Broomfield Gardens, there is already a history of excessive water run-off during heavy rain. There are fears that removal of trees and introduction of hard landscaping will exacerbate this effect leading to significant soil erosion and impacting properties lower down the slope. This appears contrary to policy LDP 10 (bullet 5) and possibly SG LDP ENV6.
11. The Main Issues Report (MIR), produced as a precursor to the proposed Local Development Plan, did not include H2006. Given that A&BC were already marketing the site for potential housing, and the sensitivity of a large scale development of this nature, it should have been highlighted in the MIR in accordance with paragraph 55 of Scottish Planning Circular 1 2009: “new or controversial elements of plan content should already have been aired at the main issues report stage”. In the absence of earlier consultation the inclusion of H2006 is questioned.
12. Building 124 housing units at Blarvadach will lead to an excessive increase of traffic on the access road, and also on the main A814 through the villages, for which there is no provision in the LDP.

Thus, in summary, these proposed allocations are unacceptable because there is no demonstrated need for the number of units, the scale and density of the proposals are not in keeping with the character of the area and setting of the village, and no provision has been made for the impact on facilities such as the local school or roads.

5b Please indicate the changes that would be required for you to remove your objection

The allocation for H-AL3/6 should be maintained at the 2009 Local Plan number of 28 units with 25% affordable.

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.

Argyll & Bute Council must demonstrate that due process has been followed with respect to including H2006 in the proposed LDP when it was not addressed in the MIR report. Note that both H-AL3/6 and H2006 are sites owned by Argyll & Bute Council.

Part 5 Notes : Your response in part 5 should be no more than 2,000 words. Please use continuation page(s) as necessary and attach securely to this form. If you intend to attach any supporting documentation, please provide a summary of your representation using this form, which should not exceed 2,000 words. There is no automatic opportunity for parties to expand on a **proposed Local Development Plan** representation later in the process.

Argyll and Bute Proposed Local Development Plan Representation Form - Guidance Notes

1 What is this form?

- i) This form is to be used for representations on the Argyll and Bute Proposed Local Development Plan and associated documents including the Draft Supplementary Guidance.
- ii) The Planning Authority **will only validate** responses submitted on this form.

2 Where can I get additional copies of the form?

On line, electronic and hard copy versions of the form are available:-

- i) On line and electronic versions at - www.argyll-bute.gov.uk/ldp
- ii) Hard copy versions at
 - a. The following Council Offices/Service Centres:- Council Headquarters Offices, Kilmory, Lochgilphead; Manse Brae, Lochgilphead; Chalmers St, Ardrishaig; Municipal Buildings, Oban; Milton House, Dunoon; Blairvadach, Helensburgh; Bowmore, Islay; Tobermory, Mull; Crossapol, Tiree; Craighouse, Jura; Scalasaig, Colonsay.
 - b. public libraries at Tarbert, Rosneath, Cardross, Oban, Helensburgh, Dunoon, Rothesay, Campbeltown, Lochgilphead; or by
 - c. telephone 01546 60 4158 or e mail ldp@argyll-bute.gov.uk.

3 How do I fill in the form?

- i) You should use the form to tell us about your issues with the Proposed Local Development Plan, Draft Supplementary Guidance and any other associated documents.
- ii) 1 - Please fill in your contact details Anonymous representations will **not** be accepted. Only representations with your name and contact details will be validated.
- iii) Please use a **separate** form for **each** issue or aspect of the plan you wish to make a comment on
- iv) 2 - Please tell us **which document** you wish to make a representation on as the responses to each require to be handled in different ways.
- v) 3 – We need to know which part of the document you are telling us about. Please fill in **all** boxes that apply. E.g. page number, chapter or paragraph you are referring to or which particular site or policy.
- vi) 4 - Please tick **one** box **only** to indicate whether your representation is in support of the issue you are telling us about or if you would like to see a change and therefore have an objection.
- vii) 5 – Please provide **all** details in support of your representation in this section. You should fully explain the issues that you wish to be considered, in particular if your response is on the proposed Local Development Plan as for this there is no automatic opportunity for parties to expand on their representation later in the process. Additional sheets may be used. The Scottish Government advises that representations by stakeholders and the general public on the proposed Local Development Plan should be concise (no more than **2,000 words** plus any limited supporting productions e.g. reports (these must be summarised on the form), maps or photographs). If there are unresolved representations on the proposed Local Development Plan the Scottish Ministers will appoint a person to examine the plan at which time the planning authority is required to provide a summary of unresolved issues. The Council will consider the issues raised on the other documents.
5a –tell us about the issue (either support or objection). 5b – if you have made an objection we would like to know how you think this could be resolved.

4 Where do I return the form to?

Please return the form to:-

- On line: Submitted directly using submit button
- Electronic copy: e-mail to ldp@argyll-bute.gov.uk
- Hard copy: Post to Development Policy Team, Argyll and Bute Council, Manse Brae Offices, Lochgilphead, PA31 8RD
or Fax to 01546 604643

5 Is my response confidential?

Representations cannot be treated confidentially and will be scanned and made available for public inspection, except any information which would be subject to the Data Protection Act 1998. They may also be passed to the Scottish Government's Directorate for Planning and Environmental Appeals in order that they can involve you in any Examination of the Plan.

6 When must I return my form?

Your representation must be received by 29th April 2013 before 5 p.m.

7 If you have any other queries?

Please contact Sheila McKenzie on 01546 604158 or e mail at ldp@argyll-bute.gov.uk



EQUAL OPPORTUNITIES MONITORING FORM
Argyll and Bute Council – Development and Infrastructure

By filling in this form you can help Argyll and Bute Council treat everyone fairly in the consultation process on the Argyll and Bute Local Development Plan (LDP). Accurate data on our customers will help us make sure the LDP meets the needs of the area. The information you provide will not be passed on to any third party and will be treated completely separately from any response to the consultation you make. It is **not** a requirement of the consultation that you return this form.

How to complete this form:

Please send **one** copy of this form along with your response on the Proposed Local Development Plan to ldp@argyll-bute.gov.uk or by post to Development Policy Team, Argyll and Bute Council, Manse Brae Offices, Lochgilphead PA31 8RD.

To check a box with an 'x' please 'double click' the box and select 'checked' under the option of 'default value', then click 'ok' to return to the form.

1 I am answering as :-

- an individual (go to question 2)
- on behalf of a group (go to question 6)

2 GENDER IDENTITY

- Male Female

3 AGE

How old are you? Please tick a box to select an age group.

- 0 – 15 45 – 64
- 16 – 24 65 – 74
- 25 – 44 75+

4 ETHNIC GROUP

What is your ethnic group? Choose **one** section from A to E, then tick **one** box which **best describes** your ethnic group or background.

A White

- Scottish
- English
- Welsh
- Northern Irish
- British
- Irish
- Gypsy/Traveller
- Polish
- Any other white ethnic group, please write

B Mixed or multiple ethnic groups

Any mixed or multiple ethnic groups, please write

Continued overleaf

- C Asian, Asian Scottish or Asian British**
- Pakistani, Pakistani Scottish or Pakistani British
 - Indian Scottish or Indian British
 - Bangladeshi, Bangladeshi Scottish or Bangladeshi British
 - Chinese, Chinese Scottish or Chinese British
 - Other, please write

- D African, Caribbean or Black**
- African, African Scottish or African British
 - Caribbean, Caribbean Scottish or Caribbean British
 - Black, Black Scottish, Black British
 - Other, please write

- E Other ethnic group**
- Arab
 - Other, please write

5 DISABILITY

Under the terms of the Disability Discrimination Act 1995, a disability is defined as a physical or mental impairment, which has a substantial and long-term adverse effect on a person's ability to carry out normal day-to-day tasks. If you consider yourself to be disabled, please tick ✓

- Yes No

Individuals please return the form now.

Groups only please fill in question 6.

This helps us find out about the **target audience** of groups (not necessarily the same as those running the group). Examples - If a group is open to **all** those interested in building preservation you should tick "Anyone" only, regardless of the age, gender etc. of the actual people in the group. If the group targets any category group as noted please select the categories e.g. Girl Guides tick "Children" and "Female".

6 Which group(s) of people does your organisation aim to work with most?

*Please read through whole list, then **tick up to 3 only***

- | | |
|--|---|
| <input checked="" type="checkbox"/> Anyone – no specific group | <input type="checkbox"/> Older people |
| <input type="checkbox"/> Male gender based group | <input type="checkbox"/> Young people (age 13-25) |
| <input type="checkbox"/> Female gender based group | <input type="checkbox"/> Children (under age 13) |
| <input type="checkbox"/> People from minority groupings
Please specify minority group below | <input type="checkbox"/> People with disabilities |

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Thank you for your help.