



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)		Chapter No(s)		Paragraph No(s)	
Policy Reference	Development Management Zones		Policy Title	Green Belt	
Site Reference e.g. H3001	Local Development Plan Map		Site Name	Green Belt in Rhu & Shandon including Highlandman's Wood/Tom na h-Airidh	

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.

This objection refers to changes to the Green Belt within the Rhu and Shandon area.

There are two areas, which under the current adopted Local Plan 2009 are zoned as Green Belt, but which in this plan have been downgraded to Countryside, which are shown as such on the main Helensburgh & Lomond proposed Local Development Plan map. These changes are not referred to in the Written Statement, nor are they easily identified on the various maps. They are most clearly seen on the "Proposal Map Changes" submitted to the Helensburgh & Lomond Area Committee in Dec 2012. They are also shown clearly in the Argyll & Bute Council Green Belt Landscape Study by Ironside Farrar published in Feb 2010 (referred to here as the Ironside-Farrar Report).

In addition there is an area lying between the Rhu, Shandon and Helensburgh current Green Belt limits from Aldownick Glen in the north-west, out to the National Park Boundary in the north and east, and across to the A818 in the east, which includes the LNCS around Aldownick Glen, Highlandman's Wood and most of Tom na h'Airidh, which R&S CC feels should be zoned as Green Belt, for the reasons given below.

The areas are referred to here as:

Area "A"

The area to the north-west of Aldownick Glen in Rhu, lying to the east side of the West Highland Railway and stretching as far as Shandon Station Road in to the north. In the Ironside-Farrar Report it is made up of the NW part of RN01, SN01 and SN05.

Area "B"

Highlandman's Wood north of Highlandman's Way referred to in the Ironside-Farrar Report as HW01.

Area C

This is 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. It includes area B and Tom na h-Airidh.

The Rhu & Shandon Community Council (R&S CC) object to the re-designation of Area A and B from Greenbelt to Countryside, and request that Area C be zoned as Greenbelt, for the following reasons:

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 with respect to Area A and B 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, a view not shared by R&S CC.
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. In the case of areas A and B there is a clear case for their retention as Green Belt to protect the setting of Shandon in the case of area A, and Rhu and Helensburgh in the case of area B.
6. Extending the Green Belt zone across area C provides 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. R&S CC believe Green Belt provides a better level of protection against, for example, development such as wind farms.

8. In the case of area A, its removal 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 as an area where houses are screened by dense woodland (Ironsides Farrar page 18). In addition the inner boundary of that strip 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.
9. Ironsides-Farrar refers in the case of area A to the West Highland Railway forming a defensible boundary to the Greenbelt. However the outer boundary of area A is clearly marked by walls, fences and other landscape features (eg; streams) which do provide a clear and unequivocal boundary to the Greenbelt, as suggested by paragraph 162 of Scottish Planning Policy Feb 2010.
10. Highlandman's Wood, area B, and the wider area C, are both 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. The boundaries to this area are delineated by landscape features which could equally be used to bound the extended Green Belt zone.

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

The proposal to downgrade the two areas (A and B) from Green Belt to Countryside should be reversed and both the areas retained and zoned as Green Belt.

The area referred to as area C (which also includes area B) should be re-zoned in its entirety from Countryside to Green Belt.

Referred to here as Area "A"

The area to the north-west of Aldownick Glen in Rhu, lying to the east side of the West Highland Railway and stretching as far as Shandon Station Road in to the north. In the Ironsides-Farrar Report it is made up of the NW part of RN01, SN01 and SN05.

Referred to here as Area "B"

Highlandman's Wood north of Highlandman's Way referred to in the Ironsides-Farrar Report as HW01.

Referred to here as Area C

This is 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. It includes area B and Tom na h-Airidh.

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.