

Objector: Clydebelt
Objection: 31M
Policy: GB1

STATEMENT OF CASE - Objection 31M for the November 2003 Public Local Inquiry on the Clydebank Local Plan

1. Background

Clydebelt is dedicated to retaining and enhancing our heritage and the Green Belt status of the Kilpatrick Hills and their surrounding environment in Clydebank, Dumbarton, Milngavie, Bearsden and Glasgow. Clydebelt is concerned with other undeveloped areas nearby, including the north bank of the River Clyde, and in the "villages" of Old Kilpatrick, Dalmuir, Duntocher, Hardgate, Faifley, Drumchapel, Craigton, Carbeth, Gartocharn, Jamestown, Bonhill, Milton and Bowling. Clydebelt tries to influence public policy, on planning, access etc.

2. Location

This objection relates to Green Belt within the Clydebank Local Plan area.

3. Policies in Local Plan

Modification 6 of Policy GB1 *Green Belt*, p19.

4. Maintained objections

Clydebelt supports the proposed Local Plan's provisions for protection of the Green Belt, and objects to only a few points concerning green spaces. Clydebelt is opposed to the other maintained objections on the preference for housing development on brownfield land, and on the use of the term wildlife corridors, and seeking to remove 4 sites from Green Belt and identify them for housing.

Clydebelt generally supports policy GB1 Green Belt, which is similar to that supported in the previous local plan. This policy complies with national policy, and with the adopted Glasgow & Clyde Valley Structure Plan, in particular Strategic Policy 1 which requires Local Plans to safeguard the Green Belt.

In recent years, the application of policy GB1 on Green Belt has been fairly successful, from our point of view, in diverting development away from the Green Belt, although there have been some economic and housing developments that we felt could have been refused. However policy GB1 has not been the only influence. We suspect that this is due to the availability of a large area of other land, particularly brown field sites, identified as sufficient for housing or suitable for commercial redevelopment. At the moment development pressure can be resisted.

As this land identified for development becomes used, and the identified land need for housing and economic development comes closer to that remaining available, then the pressure to apply policy GB1 more in favour of development will become intense. The argument that there is a specific locational need would be offered far more often by developers, and supported by councillors.

There will be an inclination to interpret in favour of development any part of the policy which is open to opinion. Decisions could go far more often against retaining a site on the Green Belt, especially with councillors taking decisions against the advice of officials.

Policy GB1 states that “Within the area of the Green Belt shown on the Proposals Map there will be a presumption against development - unless” followed by six bullet points.

The proposal in Modification 6 is to introduce a further bullet point to the exceptions to read “it does not have an adverse impact on the environmental character of the area” . We believe that this point is undesirable.

We consider that its intentions are covered adequately by the last sentence of Policy GB1 - “Proposals for new buildings, extensions or the change of use of existing buildings within the Green Belt will have to pay particular regard to design, siting, landscaping, nature conservation and protection of habitats.”

The proposed new bullet point does not seem to have been derived directly from any similar point in national or regional policy (eg SDD Circular No. 24/1985), and is therefore an unnecessary complication which may lead to poor decisions.

This point, as worded, would enable a proposal to be determined on opinions of the relative qualities of the design of the proposal and the condition of the area of Green Belt concerned.

It is well known that part of a Green Belt area can be allowed to become unattractive, eg by dumping, so that opinions swing against its retention. This is particularly the case for the edge of the Green Belt, on the very fringe of urban development. Many parts of this fringe have been identified by occupiers or developers as potentially profitable development land. The owners often deliberately let them become unattractive, and fly-tippers find little resistance to spoiling them further. In these situations officials and councillors are more inclined to regard the attractiveness of the design of proposals as outweighing the attractiveness of those areas of Green Belt.

This bullet point could be acceptable if it included some safeguard such that the earlier, restorable or potential environmental character of the area should be the quality considered. But we consider that it is safer to not use exclusions which would lead to the preservation of Green Belt depending on perceptions of its current relative quality.

Documents that may be cited

- SPP1 *The Planning System* 2002
- SPP3 *Planning for Housing*, 2003
- NPPG14 *Natural Heritage*, 1999
- NPPG11 *Sport, Physical Recreation And Open Space*, 1996
- PAN 60 *Planning for Natural Heritage*, 2000
- SDD Circular No 24/1985 *Development In The Countryside And Green Belts*, 1985
- *Glasgow and the Clyde Valley Joint Structure Plan* 2000 - 2003
- Clydebank Local Plan, adopted 1994
- Clydebank Local Plan, List of Proposed Modifications, 2003

Witnesses

Dr Gordon Doughty BA, PhD, CPhys, MInstP, a member of Clydebelt.