

**Representations on the
Glasgow and the Clyde Valley Consultative Draft Alteration 2005
to the Joint Structure Plan 2000
(and Related Strategic Environmental Scoping and Draft Environmental Report)**

16-6-2005

Green Belt

2.25 (p18)

We are glad that you propose to retain the objectives of the Green Belt set out in the 2000 Plan. We also note that they may need to be adjusted in the light of the forthcoming Executive review of Green Belts. We shall be making submissions when it emerges (perhaps not until August). We may not agree with its proposals or outcomes, and may object to interpretation of how items will be incorporated into this 2005 Plan.

2.25 (p18)

It follows that we are glad that you propose to retain existing areas designated as Green Belt. We would object to any diminution of Green Belt in West and East Dunbartonshire and Glasgow to provide for urban expansion.

Housing requirements

4.18 (p33)

- (a) We object to the requirement for Dumbarton to contribute to the growth of housing for the wider G&CV area (even though more than enough is allocated in its local Housing Market Area), because that implies greater pressure on the Green Belt in West Dunbartonshire.
- (b) We object to housing needs being projected assuming that there will be significant economic growth to decrease net migration out. This was not assumed in the 2000 Plan, which simply used projections of trends. Argyll & Bute Council was not allowed by the Executive to include optimistic economic growth aspirations in its structure plan housing needs determinations, and G&CV should not do so.

Renewable Energy from Wind Sources

4.35 (p40) and TR11/05 Renewable Energy

G&CV should decide what size of windfarm is "*significant*" (below which, if outwith designated areas, it would not be seen as a departure from the plan). The policy suggested in the draft only relates to developments over 50MW (about 25 turbines) in size. But these are decided by the Executive, not by any local authority. Those smaller than 50MW are left to Local Plans, and this Draft 2005 Plan does not provide any guidance to local planners. A smaller size needs to be chosen as "*significant*" for local authorities to have influence in practice. We suggest 10MW (about 5 turbines).

TR11/05 Renewable Energy

We agree that there should be a 3km buffer round all settlements, and that "*development on this scale would not be appropriate in the Green Belt and would conflict with its aims. It would mean windfarms being developed too close to urban areas and would lead to conflict with the policies in the rest of the plan which aim to enhance the Green Belt as a recreational resource for the urban population.*"

4.36 (p40 and Diagram 11) and TR11/05 Renewable Energy

We object that part of the Kilpatrick Hills is now designated as a "*potential area of search for windfarms*", which was not the case in the 2000 Plan. We regard the selection as arbitrary - consultants studied the impact of windfarms in South Lanarkshire, and then this area was added to the plan without justification. The report amazingly has: "*the principle of accommodating windfarms in*" Regional Scenic Areas "*is not in direct conflict with the reasons for their designation. Unlike with National Parks etc who have a recreational status and well as a scenic one, RSAs have been identified based on purely scenic grounds. Therefore there is a possibility that windfarms could be accommodated in these areas but this will require further detailed assessment.*" RSAs may not have a statutory recreational status, but - especially the Kilpatrick Hills - it is necessary to use the hills recreationally in order to actually see and appreciate the Scenic Area. The part zoned for windfarms includes some of the most intensely used recreational part of these hills.