I sit on Helensburgh Community Council (HCC) and wish to submit comments on the Bill which have arisen as a result of a recent planning application by Persimmon Homes for 76 homes which was passed on 19 December. These are:

1. **SCHEME OF DELEGATION**

The Argyll & Bute Council (A&BC) area, after Highland, the most dispersed in Scotland. It has a longer coastline than that of France and the largest number of Islands in Scotland. However its boundaries are not consistent with its history, culture, environment or business/industrial/employment legacy. Argyll & Bute is what it is for political reasons and for none other.

WHY - under local government reform in 1997 Helensburgh & Lomond (H&L) was removed from West Dunbartonshire and placed within Argyll & Bute. H&L contains circa 30% of the population of Argyll & Bute while occupying under 5% of its landmass. In reality however H&L is part of Greater Glasgow in almost every way you care to think of. HMSB at Faslane is possibly the largest in Europe and the Babcock site with its 2.5K+ employees is in manpower terms possibly the largest single industrial site in the UK. H&L is a commuter area for the Glasgow area. Its hospitals/universities/major retail outlets are there as well. Need I go on.

In short H&L is NOT a natural fit with the rest of Argyll & Bute but this is not recognised in its planning regime. To an outsider H&L is simply one of 4 administrative areas within the boundaries of Argyll & Bute. This causing major problems. With its 15,000- population Helensburgh is the biggest town by far in Argyll & Bute and is seeing its largest housing developments in over 30 years. Also : it will soon enjoy a well needed £20M replacement Leisure Centre.

This reality has important implications in the determination of planning applications. While small and contentious applications are determined within H&L major applications or those attracting more than 10 objections are considered by A&BC’s Planning, Protective Services and Licensing (PPSL) Committee which may decide on a public hearing. A&BC has 37 Local Councillors of whom 15 are PPSL Committee members. Of these only 4 represent Helensburgh itself with one representing a constituency elsewhere in H&L. Thus all important planning decisions are made by a Community the vast majority of whom are from outwith H&L and (almost by definition) know little or nothing about it. As has recently occurred with the Persimmon application. They are much more attuned with highland and island
communities which have their own largely different, but no less worthy, imperatives and priorities.

The present arrangements also run counter to the spirit of the Planning (Scotland) Bill as stated on the Scottish Government website:

“The Scottish Government explains that the Bill will improve the system of development planning, giving people a greater say in the future of their places and support the delivery of planned development”.

Not in my book it won’t. And similarly with H&L Councillors helping determine applications from rural Argyll & Bute and the Islands.

In addition they are the very antithesis of the spirit of the Community Empowerment (Scotland) Act 2015 which is designed to:

“help ..... empower community bodies by strengthening their voices the decisions which matter to them.”

RECOMMENDATION : Planning applications because of their scale, sensitivity, level of public opposition or are deemed significantly contrary to the LDP go to full Council (PPSL) Committee. Where there is a public hearing 50% of the Local Councillors come from the Area in question.

2. LOCAL DEVELOPMENT HOUSING ALLOCATIONS – INDICATIVE

Planning allocations in the LDP should not be set in stone – situations change as do housing policies. The allocation for the Persimmon site is (now was) 60 presumably for a number of good reasons – Council housing policy and the capacity of local services to cope – transport, health, education. The Company originally asked for 85 but the agreement reached is for 76 – a 27% increase. In my view too high. What had changed so significantly since 2015 to warrant such a large variation? No plausible reason has been given.

RECOMMENDATION: where the number of houses applied for is more than 10% above the LDP allocation, and is deemed to be warranted, the Planners reasoning should be made public.

3. COMMUNITY COUNCILS AS STATUTORY CONSULTEEES

Statutory Consultees, such as Community Councils, are notified automatically on planning applications. Where one makes (or is likely to make) an objection discussions take place with the planning authority and, where relevant, the applicant. However this last bit does not seem to apply to Community Councils. Rarely, if ever, in my experience are they asked by Council planners to explain the reasons for their opposition (thus avoiding NIMBYism) and to put forward a competent alternative.
RECOMMENDATION: As a statutory consultee Community Councils are entitled to be given the opportunity to explain to Council planners their opposition to particular planning applications and to propose competent LDP led alternatives.

CONCLUSION

Planning applications must be decided in a way that are fair, technically correct and reflect Council policies as spelled out in their Local Development Plan. But just as important they should also seen to be fair and seen to be correct. That is most certainly not the case with the Persimmon application:

“what is the point of objecting when it’s all a done deal anyway”.
“nobody listens to the objectors”.
“at PPSL hearings resident views are not listened to”.

Community involvement in planning decisions is not seen to be happening in the way it is laid down.

Yours sincerely

Nigel Millar
Helensburgh Community Councillor