



**APRS**  
The Association for the  
Protection of Rural Scotland

Head of Planning and Regeneration  
North Lanarkshire Council  
Fleming House  
2 Tryst Road  
Cumbernauld  
GLASGOW  
G67 1JW

24 November 2021

Dear Sir/Madam

PLANNING APPLICATION 18/00890/PPP  
PROPOSED RESIDENTIAL-LED MIXED USE DEVELOPMENT  
LAND TO NORTH OF A8 & SOUTH OF SYKESIDE ROAD & CALDERBANK ROAD AIRDRIE  
OBJECTION

APRS objects to the above planning application for the following reasons:

Development Plan

Planning legislation requires that the determination of a planning application is to be made in accordance with the development plan unless material considerations indicate otherwise. This site is not allocated for development either in the North Lanarkshire Local Plan 2012 or in the emerging North Lanarkshire Local Development Plan (LDP) Modified Proposed Plan. It is therefore not in accordance with the development plan and so should be refused.

Green Belt

The entire site is located in designated Green Belt, as clearly shown by Figure 6.1 in Part 3 of the Environmental Statement Non-Technical Summary.

The Clydeplan Strategic Development Plan (SDP) 2017 states at paragraph 8.15 that the Green Belt is an important strategic tool with a significant role to play in supporting the delivery of the spatial development strategy and in achieving strategic objectives. These objectives include directing planned growth to the most appropriate locations, supporting regeneration, safeguarding identity and protecting landscape setting. SDP Policy 14, Green Belt, requires Local Authorities to designate Green Belt boundaries within Local Development Plans to ensure that the objectives set out in paragraph 8.15 are achieved.

During the Examination of the North Lanarkshire LDP Modified Proposed Plan in 2020-21, the applicants made representations to remove this site from the Green Belt and to allocate it for development. However, these representations were unsuccessful: in the Report of Examination submitted in May 2021 the Reporters stated that the site was not included in the Main Issues Report, had not been the subject of public consultation in relation to the proposed LDP and had not been subject to strategic environmental assessment in relation to the proposed LDP, so it would not be appropriate to recommend altering the proposed LDP in response to the representation.

The proposed development does not comprise any of the 'types of acceptable development' in the Green Belt listed under Local Plan Policy NBE3, so it should be refused. The LDP Modified Proposed Plan identifies several brownfield sites which should all be developed before any sites in the Green Belt are even considered. Also, as recently reaffirmed in the DPEA Report of Examination, a shortfall in the land supply would not justify the allocation or release of land that would otherwise be deemed to be unsuitable.

North Lanarkshire Council's Economic Regeneration Delivery Plan has a key focus of reshaping and regenerating eight town centres, which would be significantly undermined by this proposed large-scale development in the Green Belt.

#### Draft National Planning Framework 4

National Green Belts policy guides development to the most appropriate locations, whilst protecting the rural character of the landscape settings of towns and preventing their coalescence. However, the Scottish Government's Draft National Planning Framework 4, issued earlier this month, significantly expands upon the role of Green Belts and the benefits which they bring to Scotland:

"Green Belts can be used as a settlement management tool around Scotland's towns and cities to help to direct growth to the most appropriate, sustainable locations. Green Belts can have a role in protecting and enhancing the character, landscape and natural setting and identity of settlements, providing outdoor access to green networks which link urban and rural areas and supporting nature networks."

"Green Belts can ... benefit quality of life and environment in our cities and towns, increase urban density and minimise the need to travel using unsustainable modes."

The applicants proposed this development for National Development status in NPF4. However, the Scottish Government's assessment<sup>1</sup> found it to be unsuitable for that status, because of its potentially negative impacts on climate change and because it is potentially inconsistent with the spatial strategy.

#### Benefits of Scotland's Green Belts

Scotland's Green Belts, including the Greater Glasgow Green Belt of which the Woodhall and Faskine areas form part, are a precious resource of national importance. Green Belts contribute to tackling the climate emergency through directing development to more appropriate and sustainable brownfield sites, including vacant and derelict land and re-use of existing buildings. They provide many important benefits to quality of life and well-being in addition to their original planning purposes. They contain significant areas of prime agricultural land, important for home-grown food production, and semi-natural woodland. They can provide havens for wildlife so can help to tackle the nature crisis, especially as part of wider nature networks.

Green Belts have great potential, through appropriate management, to do even more to tackle the climate emergency and nature crisis and to promote home-grown food, outdoor education and recreational opportunities for local communities. In a poll of Scottish residents carried out for APRS by Survation in June 2017, 74.6% of those who expressed an opinion agreed that "All Green Belt land in Scotland should have stronger protection from building development".

#### Woodhall and Faskine

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<sup>1</sup> Scottish Government (2021) Scotland 2045 - fourth National Planning Framework - draft - national developments: assessment report: Annex D: Suggestions Not Thought to be Suitable for National Development Status

The Woodhall and Faskine area possesses great beauty, historical interest and a variety of remarkably unspoilt landscapes. The area provides valuable space for exercise, fresh air and tranquillity for local people from the surrounding towns and villages. It should definitely be protected from development for the long term. There is great merit in the idea that this whole area should be considered for designation as a Country Park. This would bring in additional resources and expertise to enable more people to experience and enjoy both its natural and historic features. It would also however promote the protection of its valued landscapes, partly through supporting the traditional agricultural and woodland management land uses on which some of its special qualities depends.

Yours faithfully

A handwritten signature in black ink that reads "John Mayhew". The signature is written in a cursive style and is underlined with a single horizontal stroke.

John Mayhew MA MSc DipTP MRTPI  
**Director**