

<p>East Renfrewshire LDP3 Issue: Supporting Documents</p>	<p><u>SD 001 - Site Assessment Framework</u> <u>SD 002 - Strategic Environmental Assessment (SEA) Scoping Report</u></p>
<p>Information required by the Act regarding the issue addressed in this section</p>	<p><u>2019 Planning (Scotland) Act</u></p>
<p>Links to Evidence</p>	<ul style="list-style-type: none"> • Appendix 1 of Strategic Environmental Assessment (SEA) Scoping Report
<p>Summary of Evidence</p>	
<p><u>SD 001 - Site Assessment Framework</u> The document sets out the methodology and assessment process for the consideration of land/sites for development in LDP3. In doing so, it identifies the guiding principles for establishing potential new site allocations, consistent with national planning policy and sustainable development.</p> <p><u>SD 002 - Strategic Environmental Assessment (SEA) Scoping Report</u> The Strategic Environmental Assessment is an integral part of the Local Development Plan process and provides a systematic assessment, which ensures that environmental considerations are taken on board at an early stage in Plan process. The SEA Scoping Report is the first stage in this process and defines the scope/level of environmental detail to be covered in the Environmental Report for the Proposed Plan. The Scoping Report was submitted to the SEA Gateway for comment on the 19th of April allowing a period of 6 weeks for the Gateway to respond.</p>	
<p>Summary of Stakeholder Engagement</p>	
<p>Section 4 ‘Engagement Statement’ of the Evidence Report summarises the various engagement and consultation activities that have been undertaken to inform the Evidence Report. This includes collaborative working with Key Agencies and other stakeholders in the preparation of Topic Papers and the Play Sufficiency Assessment, and other place-based engagement and workshops.</p> <p>A series of Topic Papers were prepared structured around the sustainable, liveable and productive places themes of National Planning Framework 4.</p> <p>Wider external engagement with stakeholders commenced on 12th April and ended on 10th May 2024, inviting people interested in LDP3 to review the Topic Papers that cover their areas of interest and to share their comments. The aim of the engagement was to establish areas of agreement or disagreement and any additional evidence that should be taken into account.</p> <p>The Topic Papers were published on the Council’s Local Development Plan Hub on Commonplace, and through the Council’s LDP3 website, Facebook and Twitter account and email notifications were sent to individuals and organisations listed on the LDP contact database.</p>	

The SEA Scoping Report was submitted to the SEA Gateway consultation authorities on 19th April for a 6-week consultation period. The Gateway Authorities were generally supportive of the Scoping Report subject to a few points for consideration for the Environmental Report to be prepared alongside the Proposed Plan. Comments are summarised in Section 4 Table 1 of the Evidence Report.

Summary of Implications for the Proposed Plan

Both documents will be key in identifying the spatial growth options for the Proposed Plan.

Statements of Agreement / Dispute

SD 001 - Site Assessment Framework

Statements of Agreement

Historic Environment Scotland

We welcome comments about the need to fully integrate the historic environment in the site assessment methodology and explicitly demonstrate a clear understanding of the significance of heritage assets and their setting when considering new development proposals.

We encourage approaches that align site assessment with the Strategic Environmental Assessment process. Reference is made to the updated Local Development Plan Site Assessment Proforma developed by the SEA Consultation Authorities (HES, Nature Scot and SEPA).

SEPA

No specific concerns with the assessment framework and acknowledge this addresses our requirements from a flood risk perspective.

East Renfrewshire Council Response

The Council acknowledges and welcomes the supporting comments received and broad agreement with the general themes presented. The SEA Consultation Authorities proforma informs and is reflected in the Council's LDP3 site assessment framework.

Statements of Dispute

Homes for Scotland, Taylor Wimpey, ICENI On behalf of East Renfrewshire Home Builder Consortium (Mac Mic Group; Miller Homes; Robertson Homes; Taylor Wimpey), Miller Homes, ICENI on behalf of The Mac Mic Group, ICENI on behalf of the Baird Family

Responses agree that all current allocated sites must be re-assessed and we support the concept of the three-level assessment approach.

Further clarification required on the requirement for Whole Life Impact Assessment.

ICENI state that the Council's Local Living assessment is not currently available. They recommend the Scottish Government Local Living Guidance is used as a reference.

We support the three-stage approach in principle but would however request caution in eliminating sites at an early stage. For instance we disagree that sites should be 'sieved out' at stage one where 'education solutions cannot be addressed' or where there is a constraint identified without properly understanding if there is mitigation or suitable solutions to resolve. Education provision is a matter to be considered in the fullness of a more robust analysis of, not just the relevant site, but every site being considered.

The 1st stage 'exclusion criteria' could include: areas designated as Sites of Special Scientific Interest (SSSIs), Special Protection Areas (SPAs), Special Areas of Conservation (SACs), Ramsar Sites, National Nature Reserves (NNRs), Local Nature Reserves (LNRs), and areas in a 1:200 fluvial flood risk zone.

It is vital that every site that is allocated in the new-style LDP is deliverable and will contribute towards meeting the Local Housing Land Requirement (LHLR) across the plan period. The Council must be sufficiently satisfied that each site is genuine deliverable, with a clear path set out to mitigate any potential viability or deliverability matters. However, it is important to understand where the required level of information and supporting assessments will be set out. Will this be at the Call for Ideas stage? This needs to be clearly set out and ideally identified now so that there is sufficient time for these to be considered and instructed/carried out, etc. If the Call for Ideas is announced, there needs to be sufficient time for the studies to be done. Also, the required level of information needs to be proportionate to the site. The Council should set out indicative timelines for undertaking each stage of the assessment process and commit to informing developers if their site has advanced to the next stage. Adequate time for developers, particularly SME's, should be allowed for to prepare more detailed information (if required), especially when SME's may need to source funding for this.

Stage 2 prioritises establishing the deliverability of the site, and stage 3 assesses the site against the NPF4 policies. This approach is supported in principle.

No site will meet all the policy requirements outlined in NPF4. It will be for the Council to select the most preferred sites, based on a holistic approach, and regard should be had to where one or more sites could individually or collectively overcome constraints, such as education capacity.

Under the assessment criteria Topic – Material Assets – Deliverability/ sustainability constraints, proposals which include development that would enhance opportunity and access to amenities / services should score favourably. In addition, proposals that create new local living neighbourhoods and where these also improve the access i.e. reducing the need to travel for existing residents should score favourably.

There should be assessment criteria for energy generation / usage within the Topic – Climatic Factors assessment. Sites that propose facilities for renewable energy generation technologies should be assessed favourably.

The site assessment framework could consider a criterion which evaluate what potential a site has for new woodland creation and strengthening nature networks.

Site submissions at Call for Sites must include supporting information.

It must be noted that developers carry out due diligence, including technical assessments, before submitting a site for consideration. This is a clear indicator of where new homes can be successfully delivered.

East Renfrewshire Council Response

Responses requested that timescales be set out for each stage of the site assessment process. The document clearly states that all supporting information must be submitted during the call for sites engagement period. This position was supported via a number of the responses received. Without this information sites will not progress further. Without this comprehensive approach delays could result in delivery against the Plan timescales as set out in the Development Plan Scheme.

Although the process is split into 3 stages following the close of the engagement the Council will assess each proposal through the entire 3 stage process. The Call for Sites will inform the spatial distribution of sites alongside other assessments to inform the Proposed Plan. The Council will contact representees to gather further information or clarify issues only if required. The Council recognises that there is an onus on site promoters to provide sufficient supporting information but would reiterate that this should be proportionate to the site and that this information will help inform future master plans or development briefs and the LDP Delivery Programme.

The Council agrees that the 1st stage 'exclusion criteria' should include: areas designated as Sites of Special Scientific Interest and areas in a 1:200 fluvial flood risk zone.

The Council notes comments about Education constraints. The Evidence Report clearly states that Education infrastructure remains a significant constraint to new development. It also discusses the various options that the Council will seek to implement to allow new sites to be allocated and phased in LDP3. If the modelling identifies areas where no education solution can be found then it is appropriate for the Council to discount new sites from coming forward under this scenario.

The Council has amended the reference to a Whole Life Impact Assessment to a Climate and Carbon Impact Assessment. The aim of this being to estimate the amount of carbon emitted throughout the life cycle of a proposal, from the early stages of development though to the end of life and to reduce lifetime emissions and deliver a net-zero future. This accords with the climate emphasis of NPF4.

Reference to woodland creation and strengthening nature networks is covered under criteria 9 within the Biodiversity and Nature theme.

Reference to energy generation is covered under criteria 7 within the Climatic Factors theme.

Reference to Local Living is covered under criteria 28 within the Population and Place theme.

The document is clear that an assessment matrix will provide an illustrative assessment of each site. The outcome of the matrix will allow sites to be compared and those sites which score favourably to be considered further.

SD 002 - Strategic Environmental Assessment (SEA) Scoping Report

Statements of Agreement

Nature Scot

- Clear, well set-out and easy to follow.
- Content with the scope and level of detail proposed for the Environmental Report. We note that all SEA Topics have been scoped into the assessment and we agree with this approach.
- The use of an assessment matrix and SEA Objectives is a tried and tested approach and we support the use of this methodology.
- Welcome the three-stage process proposed for assessment of sites, and we are pleased that the process has been informed by the recently updated LDP Site Assessment/SEA Checklist that the Consultation Authorities jointly prepared. We support the inclusion of the mitigation hierarchy as part of the assessment methodology.
- Pleased with the draft Environmental Objectives set out in Table 2. Welcome the inclusion of biodiversity conservation, restoration and enhancement, and the consideration of habitat connectivity, wildlife corridors, and nature networks in the Biodiversity and Nature theme. We note that nature based solutions are considered under the Climatic Factors theme, and blue-green infrastructure and networks providing multiple benefits are included under the Landscape theme. We strongly support the inclusion of these objectives, and in general we are happy with the full set of objectives relevant to our remit.
- Note that a minimum of 12 weeks is proposed for consultation on the Environmental Report along with the Proposed Plan, and we are content with this proposed timeframe.

Historic Environment Scotland

- Note that the historic environment has been scoped into the assessment and we are content to agree with this. Content with this approach and are satisfied with the scope and level of detail proposed for the assessment.
- Advise that your council's Sites and Monument Record should also be included in the baseline for the assessment.
- Welcome that the SEA scoping report has been aligned with the publication of the Topic Papers comprising the Evidence Report and that the same baseline information will be used.
- Welcome the objective identified for the historic environment and the intended use of the proforma questions.
- Overall, the approach to the assessment is sound from our historic environment perspective.
- Agree with the staged approach to the Site assessment with Stage 1 screening out sites that are unsuitable for development due to major constraints and an environmental assessment being carried out at Stage 3 to assess each site as 'reasonable alternatives' against the SEA framework.
- Recommend adding an additional consideration to Table 2 to test the extent to which the policy or proposal could affect the historic environment designations.
- Note that a 12-week consultation period is proposed for the consultation on the Environmental Report and we are content to agree with this timescale.

SEPA

- Generally content with the proposed scope and methods to be employed for the assessment.

- Welcome that the SEA scoping report has been aligned with the publication of the Topic Papers comprising the Evidence Report.
- Agree all environmental topics should be scoped into the assessment.
- Support the use of SEA objectives.
- Recommend you consider including a headline objective for each topic help to make the assessment more focussed and therefore easier to assess whether the overarching aim for that SEA topic is achieved.
- The ER should identify any changes made to the plan as a result of the SEA.
- Content with the proposed assessment matrix and particularly welcome the commentary box to explain the rationale behind the assessment results.
- Welcome the link between effects and mitigation / enhancement measures in the assessment framework and the consideration of mitigation of impacts
- If the LDP includes local level policies that are different from the NPF4 policies, they should be assessed for significant effects.
- Any reasonable alternatives identified during the preparation of the plan should be assessed as part of the SEA process and the findings of the assessment should inform the choice of the preferred option. This should be documented in the ER.
- Satisfied with the proposal for a 12-week consultation period for the ER.
- Consideration should be given to a monitoring approach particularly in the choice of indicators. It would be helpful if the ER included a description of the measures envisaged to monitor the significant environmental effects of the plan.
- Helpful if the ER included a summary of the scoping outcomes and how comments from the Consultation Authorities were considered.

East Renfrewshire Council Response

The Council acknowledges and welcomes the supporting comments received. The Council notes comments about points for consideration for the Environmental Report. These will be addressed during preparation of the Environmental Report.

Gate Check

The Council is of the view that the Site Assessment Framework sets out a clear and transparent approach for assessing future proposals. It is clear from the responses that some areas of dispute remain and may require to be considered by the Reporter.

The Council is of the view that there are no areas of dispute to be considered at Gate Check regarding the SEA Scoping Report.

<p>East Renfrewshire LDP3 Issue Topic Paper 001 - Climate Mitigation and Adaptation</p>	<p>NPF4 – Sustainable Places Policy 1: Tackling the climate and nature crisis Policy 2: Climate Mitigation and Adaptation</p>
<p>Information required by the Act regarding the issue addressed in this section</p>	<p><u>2019 Planning (Scotland) Act</u></p> <p>Section 15(5):</p> <ul style="list-style-type: none"> • The principal physical and environmental characteristics of the district. <p>Section 3F:</p> <ul style="list-style-type: none"> • Policies regarding low and zero-carbon generating technologies in new buildings. <p>Other statutory requirements:</p> <ul style="list-style-type: none"> • SEA (Environmental Report) • HRA
<p>Links to Evidence</p>	<ul style="list-style-type: none"> • Adaptation Scotland Climate Change Projections for Scotland Summary (2021) (CD 003) • Adaptation Scotland (CD 002) • Glasgow City Region Climate Adaptation Strategy and Action Plan (CD 178) • Glasgow City Region Climate Risk and Opportunity Assessment (2018) (CD 179) • Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 (CD 011) • Climate Change Plan Update (2020) (CD 106) • Climate Ready Scotland: climate change adaptation programme 2019-2024 (CD 012) • National Planning Framework 4 (NPF4) 2023 (CD 102) • Historic Environment Scotland - A Guide to Climate Change Impacts on the Scotland’s Historic Environment (CD 029) • Historic Environment Scotland Climate Change Risk Assessment (CD 030) • Scottish Water Climate Change Adaptation Plan 2024 (CD 134)

	<ul style="list-style-type: none"> • East Renfrewshire Get to Zero Action Plan (GTZAP) CD 240 • East Renfrewshire Carbon Emissions Report (January 2024) (CD 212) • East Renfrewshire Local Heat and Energy Efficiency Strategy (LHEES) (2024) (CD 253) • East Renfrewshire adopted Local Development Plan 2 (LDP2) (2022) (CD 206) • Green Belt Landscape Character Assessment (CD 243) • the Local Living Toolkit, (CD 255) • Site Assessment Framework (SD 001) • Nature Scot - Sites of Special Scientific Interest (CD 055) • Dams to Darnley Country Park (CD193) • East Renfrewshire Local Biodiversity Sites (CD 251) • East Renfrewshire ancient woodland sites (CD 208) • East Renfrewshire Tree Preservation Orders (CD 273) • East Renfrewshire Whitelee Access Project (CD 275) • Scottish Native Woodland Survey (CD 129) • Scotland's Soils Database (CD 091) • East Renfrewshire Local Living GIS toolkit (CD 255) • Climate Ready Clyde Glasgow City Region Vulnerability Map (2022) (CD 168)
--	---

Summary of Evidence

The purpose of this topic paper is to provide background information on the subject of climate mitigation and adaptation in relation to the development of East Renfrewshire. This topic paper looks at the key drivers for change that will minimise emissions and adapt to the current and future impacts of climate change. As an overarching policy theme, the Climate Crisis topic is cross-cutting in nature, with connections identified across a broad range of topics which are addressed in separate Topic Papers.

There is a need to enable low carbon living across the Council area and our communities through changes to infrastructure plus transport in all forms, policies and plans. The effects of a changing climate on future infrastructure needs and delivery will be far reaching, extending to impacts on health, resources and biodiversity.

Section 1 sets out an overview of climate change, trends, risks and challenges faced in Scotland. Climate change is one of the biggest challenges facing our society. The impacts of climate change have the potential to affect every part of our lives, including access to natural resources, essential

infrastructure, affordable housing, green spaces and health and wellbeing. Linked to climate change, the planet is facing a nature and biodiversity crisis too.

The planning system is fundamental in the transition to a zero-carbon place and economy and minimising the carbon emissions of development, in delivering new renewable energy systems, and of designing zero carbon places which support healthy and sustainable transport options.

The Topic Paper refers to a number of key documents including the Climate Change Projections for Scotland Summary (2021), Glasgow City Region Climate Adaptation Strategy and Action Plan and the Glasgow City Region Climate Risk and Opportunity Assessment as shown in the links above.

Section 2 outlines the policy context. A number of key documents are summarised including the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, Climate Change Plan Update, NPF4 and the Councils Get to Zero Action Plan, LHEES and the adopted LDP2. Considerable work has already been undertaken through the Get to Zero Action Plan and other Council initiatives to better understand climate mitigation and adaptation across the Council area. Further analysis will though be required once the spatial distribution of development is agreed through the Proposed Plan stage of LDP3.

Section 3 sets out climate mitigation and adaptation challenges for East Renfrewshire. In October 2021 East Renfrewshire Council declared a climate emergency and set a target for net zero carbon emissions by 2045. The paper outlines the joint approach with Climate Ready Clyde, local challenges including demographic pressures due to an ageing population, flood risk, sustainable design and construction, nature and biodiversity, transport and connectivity, low carbon energy, zero waste and local living.

Climate Ready Clyde Vulnerability Maps shows the postcode areas within the City Region that are most vulnerable to the impacts of climate change. The map (and Figure 1 of the paper) highlights concentrated areas of both Barrhead and Neilston are vulnerable to the impacts of climate change within East Renfrewshire. Mitigation projects that the Council have implemented are shown which includes a tree planting programme, heat network feasibility studies, updated Property Asset Management Plan and a new fleet purchasing policy amongst others.

Section 4 sets out the implications for LDP3, which have been informed by the analysis and outputs in the report.

The LDP3 Evidence Report SEA Scoping Report (April 2024) defines the scope/level of detail to be covered in the Environmental Report for the Proposed Plan. Section 4 provides an overview of the environmental characteristics of East Renfrewshire. Table 2 sets out the SEA objectives relating to each SEA theme which includes a section on Climatic Factors.

Summary of Stakeholder Engagement

Section 4 'Engagement Statement' of the Evidence Report summarises the various engagement and consultation activities that have been undertaken to inform the Evidence Report. This includes collaborative working with Key Agencies and other stakeholders in the preparation of Topic Papers and the Play Sufficiency Assessment, and other place-based engagement and workshops.

A series of Topic Papers were prepared structured around the sustainable, liveable and productive places themes of National Planning Framework 4.

Wider external engagement with stakeholders commenced on 12th April and ended on 10th May 2024, inviting people interested in LDP3 to review the Topic Papers that cover their areas of interest and to share their comments. The aim of the engagement was to establish areas of agreement or disagreement and any additional evidence that should be taken into account.

The Topic Papers were published on the Council's Local Development Plan Hub on Commonplace, and through the Council's LDP3 website, Facebook and Twitter account and email notifications were sent to individuals and organisations listed on the LDP contact database.

The SEA Scoping Report was submitted to the SEA Gateway consultation authorities on 19th April for a 6-week consultation period. The Gateway Authorities were generally supportive of the Scoping Report subject to a few points for consideration for the Environmental Report to be prepared alongside the Proposed Plan. Comments are summarised in Section 4 Table 1 of the Evidence Report.

Summary of Implications for the Proposed Plan

Although the current LDP2 provides a robust framework in developing place-based solutions to a zero-carbon future and contains strong policies on climate change adaptation and mitigation, it will be critical to build upon this in the preparation of LDP3. The LDP spatial strategy should be designed to reduce, minimise or avoid greenhouse gas emissions. The Climate Emergency declared by East Renfrewshire Council and the Get to Zero Action Plan requires the Council to take urgent action to address the risks of climate change to meet key targets for reduction in carbon emissions.

National policy, including NPF4 is supportive of renewable and low carbon energy development, in order to support a Just Transition to the low carbon economy.

LDP3 will need to assess, describe and plan for the transition to a net zero approach across the entire Council area and to ensure that new developments are planned in such a way as to fit within the decarbonisation strategy for the area as a whole. This is critical if the Council are to achieve a zero-carbon place. There is a need for stronger integration of key plans, policies and strategies to ensure that actions and investment in relation to housing, planning, economy, transport, natural resources and energy, are aligned towards promoting decarbonisation and reaching net zero.

The six spatial principles of NPF4 should form the basis of the spatial strategy, helping to guide development to, and create, sustainable locations. The Proposed Plan will set out a strategy to address the climate change issues identified through this and other topic papers. It will encourage, promote and facilitate development that minimises emissions and adapts to the current and future impacts of climate change; and will ensure this is delivered in a planned and phased way, whilst directing future development away from the most sensitive and environmentally important areas of the Green Belt.

LDP3 will need to consider how to realise the full potential of the area for opportunities for renewable, low carbon, and zero emission energy as described within the Energy Generation and Distribution Topic Paper.

In preparation for LDP3 the Council will continue to develop our infrastructure policy framework to ensure the delivery of ambitious levels of sustainable energy, green infrastructure, and active and public transport. One of the biggest barriers to low carbon development is the funding of new infrastructure. If homes are to be affordable as well as attractive, it will be vital for the development industry and infrastructure providers to find ways of cutting both the long-term running costs and the up-front infrastructure costs.

For addressing the climate crisis, a fundamental objective of site selection should be that allocations for development are in sustainable locations where they can contribute to local living and reducing distances travelled by car.

The Local Living toolkit will therefore be a key factor when developing master plans or development briefs for new sites brought forward through LDP3, to identify gaps in service provision and ensure new sites are well integrated and connected with existing communities.

New development that will be identified in LDP3 provides opportunities to factor in net zero objectives, sustainable design, green network and nature based solutions, active travel and other appropriate climate mitigations at the outset of the design process. New development can provide an opportunity to shape and improve places, for example by providing infrastructure needed by existing communities and creating environments that promote health and well-being.

Place and Design opportunities will be considered carefully as part of LDP3's development. The Council will:

- Explore opportunities to deliver zero carbon places through a whole inclusive place approach to zero carbon design, service provision and infrastructure.
- Use Design Codes - to explore and demonstrate development that meets net zero objectives.
- Promote of a 'place-led' approach to designing for a changing climate. Understanding and working with existing assets, the character of areas and the surrounding landscape is critical.
- Increase the density of our urban areas/places, where appropriate.
- Encourage adaptation of existing buildings - the buildings we already have represent a significant carbon store and investing in them and adapting them, will be part of the plan strategy.
- Support a place-focussed green recovery. Encouraging nature based solutions – 'Building with Nature' is a set of wellbeing standards built around the '3 Ws' – water, wildlife and wellbeing.
- Require high standards of design with the goal of maximising a building's use, constructing it to withstand environmental pressures over a long time-period and considering the variety of uses it may have in the future.
- Ensure linkages with the Food Growing Strategy and identify land for sustainable growing within new master plan areas.
- Promote electrical car charging, car club accessibility and public transport in favour of traditional car parking. Parking standards will be reviewed as part of the LDP3 process.

Statements of Agreement / Dispute

Statements of Agreement

Public - John Morrison

Response broadly agrees with the evidence.

NatureScot

Agree broadly with the evidence.

Understand that this topic paper is supported by others. Suggest that detail on carbon sinks such as carbon rich soils and trees is shown.

Figure 1 would benefit from addition of a legend.

Pleased that the paper recognises twin nature and biodiversity crises and how these are linked.

We welcome that the paper advocates nature-based solutions as important to addressing both issues.

Scottish Water

Scottish Water supports the content of the Climate Mitigation and Adaptation Topic Paper. Scottish Water believes that a holistic approach to water and wastewater management is required. This includes adaptation and mitigation measures that address not only water scarcity but managing surface water and flooding as well as reducing carbon as part of the Hydro Nation agenda. Scottish Waters Climate Change Adaptation Plan outlines the efforts to make services and infrastructure more resilient to extreme weather. Scottish Water's Strategic Plan also sets out how we will play our full part in achieving the Scottish Government's climate change commitments through an ambitious plan to secure net zero emissions by 2040.

Historic Environment Scotland

In terms of identifying pressure on the historic environment resource, we agree that climate change and a focus on energy efficiency can pose a challenge and perceived conflict with the aims of heritage protection. We therefore welcome the recognition that it will be critical to carefully manage change so that the historic environment and its heritage assets are sustained. The historic environment has a key role to play in tackling the climate emergency and realising a just transition to net zero. Traditional buildings (those which are pre-1919) make up 19% of our existing housing stock in Scotland, and a significant proportion of our infrastructure is historic. The maintenance, reuse and retrofit of existing heritage assets mitigates resource scarcity, prevents waste and can reduce carbon emissions, particularly if low carbon materials are used. It also makes best use of the embodied carbon in the built assets we already have.

A Guide to Climate Change Impacts on the Scotland's Historic Environment and The Climate Change Risk Assessment Report are referred to.

ICENI on behalf of East Renfrewshire Home Builder Consortium (Mac Mic Group; Miller Homes; Robertson Homes, Taylor Wimpey); ICENI on behalf of The Mac Mic Group, ICENI on behalf of the Baird Family, Homes for Scotland, Cala Management Ltd (CALA), Taylor Wimpey, Miller Homes

Agree broadly with the evidence.

It is positive that the Council acknowledge that they will need to identify land within the Green Belt if growth cannot be accommodated within the urban area. Future development within these areas must have consideration for the climate and nature crisis. Development on green belt land can bring positive biodiversity effects as supported in the Scottish Biodiversity Strategy to 2045. New developments that use sustainable development approaches should be supported through the upcoming LDP3.

Do not disagree with the general themes of the Topic Paper and many of these issues that are most relevant to the climate crisis are already addressed by HFS members through their developments and through Building Regulations. There is no need for LDPs to set an ambition for optimising build quality and performance to ensure new homes and buildings are energy efficient. The focus should be on enhancing the energy efficiency of existing homes and buildings. HFS members are fully committed to reducing the impacts of climate change and protecting biodiversity and already consider sustainability as an integral part of their business.

LDP3 should promote the transition to a net zero approach across the Council area. The decarbonisation strategy for the area as a whole should lead new development and this should be planned to fit with the strategy. LDP3 should ensure strong integration of plans and policies in relation to housing, economy, transport, energy and natural resource. LDP3 should promote areas of potential for renewable, low carbon and zero emission energy generation. LDP3 should embrace a place-led approach to design taking cognisance of climate change. ERC must be flexible and open to innovative solutions to mitigate the impacts of climate change.

In addition to sustainable locations, marketability and deliverability must also be considered for new developments. This will ensure that homes are being built in the areas where there is recognised demand. The socio-economic benefits of home building cannot be understated.

Any unnecessary certification requirements should also not be imposed on the homebuilding industry at the planning stage if it is already controlled by other means. This could also affect the viability of developments and their ability to be delivered

It is positive in the LDP3 site implications section states a fundamental objective of site selection should be that allocation for development are in sustainable locations where they can contribute to local living and reduce distances travelled by car. Request that a balanced and pragmatic view is taken with respect to local living, sustainability when identifying/ assessing sites for new homes.

Housing growth areas can promote new active travel routes connecting to existing and new area. The incorporation of sustainable technologies in new development can mitigate future impacts of climate change.

An extensive sustainability strategy will be adopted within all CALA proposals for LDP3

Residential-led development can address 'Demographic change - ageing population' through the creation of new facilities and adaptable homes. Development can also manage Flood Risk, promote Sustainable Design, create Low Carbon and net zero energy generation technologies and promote Local Living and active travel.

The Topic Paper highlights concerns regarding fuel poverty. HFS members already routinely provide energy efficiency measures in their developments.

Statements of Dispute

None Received

East Renfrewshire Council Response

The Council acknowledges and welcomes the supporting comments received and broad agreement with the general themes presented. It is positive that HFS and their members are fully committed to working with the Council to reduce the impacts of climate change and protect biodiversity. The Council recognises that the Climate Crisis topic is cross-cutting in nature, with connections identified across a broad range of topics which are addressed in separate Topic Papers.

A summary of the Scottish Water Climate Change Adaptation Plan has been added to the Topic Paper.

Historic Environment Scotland's A Guide to Climate Change Impacts on the Scotland's Historic Environment and The Climate Change Risk Assessment Report have been added to the Topic Paper.

The Council agrees that Green Belts should be identified or reviewed as part of the preparation of LDPs. The Landscape Character Assessment (LCA), Site Assessment Framework and SEA will be crucial in identifying potential spatial options for the Proposed Plan to meet the 10-year housing requirements. Separate Topic Papers clearly state that further revision to the Green Belt boundaries will be required, once the spatial distribution of sites is known.

The sustainability and marketability and deliverability of proposals will be considered through the Site Assessment Framework. Local living considerations and active travel are also key components of the assessment framework. The Council will take a pragmatic and proportionate approach to the submission of supporting statements and assessments at the 'Call for Sites' stage.

Addressing fuel poverty issues is noted.

Additional text has been added to Section 3 of the Topic Paper under the heading 'Biodiversity and Nature' to address issues raised by Nature Scot. Figure 1 has been deleted and a link provided to the [Glasgow City Region Vulnerability Map \(2022\)](#).

Gatecheck

The Council is of the view that there are no areas of dispute to be considered at Gate Check for this topic.

<p>East Renfrewshire LDP3 Issue Topic Paper 2 - Biodiversity and Natural Places</p>	<p>NPF4 – Sustainable Places Policy 3: Biodiversity Policy 4: Natural Places</p>
<p>Information required by the Act regarding the issue addressed in this section</p>	<p><u>2019 Planning (Scotland) Act</u></p> <p>Section 15(5):</p> <ul style="list-style-type: none"> • The principal physical and environmental characteristics of the district. <p>Other statutory requirements:</p> <ul style="list-style-type: none"> • SEA (Environmental Report) • Biodiversity Duty Report • HRA • Forest and Woodland Strategy <p><u>Nature Conservation (Scotland) Act 2004</u></p> <p><u>Wildlife and Natural Environment (Scotland) Act 2011</u></p>
<p>Links to Evidence</p>	<ul style="list-style-type: none"> • National Planning Framework 4 (NPF4) (CD 102) • Nature Conservation (Scotland) Act 2004 (CD 054) • Wildlife and Natural Environment (Scotland) Act (CD 157) • Scottish Biodiversity Strategy to 2045 (CD 094) • Scottish Water Biodiversity Report (2023) (CD 133) • East Renfrewshire Local Development Plan 2 (March 2022) (CD 206) • East Renfrewshire Green Network Supplementary Guidance (2023) (CD 204) • East Renfrewshire Development Contributions Supplementary Guidance (2023) (CD 203) • East Renfrewshire Biodiversity Duty Report (2021-2023) (CD 209) • East Renfrewshire Get to Zero Action Plan (CD 240) • East Renfrewshire - Open Space Audit (CD 197) • NatureScot Map Search (CD 057) • Nature Scot Local Nature Conservation Sites (CD 056)

- [East Renfrewshire Local Biodiversity Sites \(CD 251\)](#)
- East Renfrewshire Local Biodiversity Sites Review 2013 (CD 252)
- [Clyde Valley Green Network Green Network Strategy \(CD 186\)](#)
- [Dams to Darnley Country Park \(CD 193\)](#)
- [Whitelee Access Project \(CD 275\)](#)
- [East Renfrewshire Blue Network \(CD 210\)](#)
- [SEPA Water Classification Hub \(CD 152\)](#)
- Scotland's Environment - [River modification Index \(CD085\)](#)
- Scotland's Environment - [Riparian Vegetation Planting \(CD 084\)](#)
- [Scottish Wetland Inventory \(CD 139\)](#)
- [SEPA Water Classification Hub \(CD 152\)](#)
- Scotland's Environment - [Barriers to fish migration \(CD 083\)](#)
- [Scottish Water: Water Resilient Places \(CD 138\)](#)

Summary of Evidence

The purpose of this Topic Paper is to provide information on the condition of biodiversity and natural places in East Renfrewshire and identify local and regionally important biodiversity sites for nature networks. NPF4 puts the climate and nature crisis's at the heart of its vision. The new Scottish Biodiversity Strategy sets targets for halting biodiversity loss by 2030 and restoring and regenerating biodiversity by 2045.

The LDP has an important role to play in creating nature positive places that are designed to reduce emissions whilst protecting and restoring the environment.

Section 1 provides an overview of the policy context for biodiversity and natural places as detailed in NPF4, the Scottish Biodiversity Strategy and the adopted LDP2. The Councils Biodiversity Duty Report and the Council's Get to Zero Action Plan are summarised.

Section 2 provides information on the condition of biodiversity and natural places in East Renfrewshire noting there are no European Site designations within the authority area. Where biodiversity interest exists, it is of local importance, although nationally important species are regularly recorded and there are areas of nationally important peatland habitat and riparian woodland. Biodiversity highlights include the reservoirs at Dams to Darnley, which attract numbers of over wintering ducks and geese and the Eaglesham moors with breeding populations of rare black grouse, hen harriers and merlin.

Located on the edge of the Glasgow conurbation East Renfrewshire has an important role in facilitating the creation of nature networks and strengthening connections between neighbouring authorities to support improved ecological connectivity. Nature Networks connect nature-rich sites, restoration areas, and other environmental projects through a chain of areas of suitable habitat, habitat corridors and stepping-stones. The work to identify nature networks is ongoing

being undertaken in collaboration with other local authorities, Green Action Trust, Clyde Climate Forest, NatureScot and Glasgow Clyde Valley Green Network.

East Renfrewshire has:

- 6 Sites of Special Scientific Interest (SSSI - the river valley woodlands in Busby Glen are of particular importance but their condition is worsening due to over grazing by deer and invasive plant species;
- 1 Local Nature Reserve at the Dams to Darnley Country Park;
- 119 Local Biodiversity Sites (LBS) of which 24 are rated poor -with the exception of Rouken Glen Park all the LBS sites in the urban area are known to be both vulnerable and in poor condition;

Section 3 provides an overview of the potential for developing the nature networks which are an expectation of both NPF4 and the Scottish Biodiversity Strategy. The East Renfrewshire nature network will focus on connecting the 119 Local Biodiversity Sites and ensuring that local networks connect with the wider regional networks. Collaborative work is ongoing to identify the optimum network across the Glasgow city region by the Clyde Valley Green Network. Mapping at regional scale has identified the important woodlands, grasslands, moorland and wetlands which will form the backbone of the regional network. The regional mapping identifies some challenges for East Renfrewshire with large gaps between species rich grasslands and woodlands evident.

This section also provides a summary of the Dams to Darnley Country Park and Whitelee Access Project.

Section 4 sets out the implications for LDP3, which have been informed by the analysis and outputs in the report.

The LDP3 Evidence Report SEA Scoping Report (April 2024) defines the scope/level of detail to be covered in the Environmental Report for the Proposed Plan. Section 4 provides an overview of the environmental characteristics of East Renfrewshire. Table 2 sets out the SEA objectives relating to each SEA theme which includes a section on Biodiversity and Nature factors.

Summary of Stakeholder Engagement

Section 4 'Engagement Statement' of the Evidence Report summarises the various engagement and consultation activities that have been undertaken to inform the Evidence Report. This includes collaborative working with Key Agencies and other stakeholders in the preparation of Topic Papers and the Play Sufficiency Assessment, and other place-based engagement and workshops.

A series of Topic Papers were prepared structured around the sustainable, liveable and productive places themes of National Planning Framework 4.

Wider external engagement with stakeholders commenced on 12th April and ended on 10th May 2024, inviting people interested in LDP3 to review the Topic Papers that cover their areas of interest and to share their comments. The aim of the engagement was to establish areas of agreement or disagreement and any additional evidence that should be taken into account.

The Topic Papers were published on the Council's Local Development Plan Hub on Commonplace, and through the Council's LDP3 website, Facebook and Twitter account and email notifications were sent to individuals and organisations listed on the LDP contact database.

The SEA Scoping Report was submitted to the SEA Gateway consultation authorities on 19th April for a 6-week consultation period. The Gateway Authorities were generally supportive of the Scoping Report subject to a few points for consideration for the Environmental Report to be prepared alongside the Proposed Plan. Comments are summarised in Section 4 Table 1 of the Evidence Report.

Summary of Implications for the Proposed Plan

NPF4 introduces a robust suite of policies for biodiversity. The new concept of nature networks becomes a core component of NPF4 Policies 3 and 4. The Council is not expected to have a major role driving action on the ground to deliver nature networks because most of the land is privately owned but LDP3 will however be expected to achieve the following:

- Spatially define the Nature Networks by connecting locally important biodiversity sites - this work has commenced in partnership with stakeholders. LDP3 will have to consider how to successfully integrate new areas for development where they converge with nature networks. The two are not mutually exclusive but will require careful planning.
- Ensure that new development delivers "positive effects" for biodiversity.
- NPF4 has set the policy bar higher than is the case for LDP2, which only requires that "adverse effects be avoided" as new development must now deliver "positive effects." This will require greater attention to the biodiversity aspects of new development when undertaking site assessment for LDP3.
- New development and biodiversity gains are not mutually exclusive, recent housing development at Barrhead South masterplan area demonstrates successful positive effects. With the new style LDP to incorporate masterplans and design briefs there is an opportunity to provide clear guidance to ensure that biodiversity is not just fully considered in new proposals, but that proposals will go on to deliver the desired enhancements.
- Ensure that the policy overlaps with Policy 1 and 2 Climate Change, Policy 5 Woodlands and Policy 20 Blue and Green Infrastructure are explicit, and synergies are maximised.
- Identify projects on Council owned land that contribute to nature networks, the creation of new habitats and the restoration of degraded habitats. This is work which could be combined with a revised open space strategy, new woodland strategy and production of an updated local biodiversity action plan.

Statements of Agreement / Dispute

Statements of Agreement

Public - Billy Clark

A single response was received from a member of the public who broadly agrees with the evidence.

Nature Scot

Agree broadly with the evidence, suggest providing more information on the definition of local biodiversity sites.

Homes for Scotland, ICENI on behalf of East Renfrewshire Home Builder Consortium (Mac Mic Group; Miller Homes; Robertson Homes; Taylor Wimpey), Taylor Wimpey, ICENI on behalf of The Baird Family

Agree broadly with the evidence. HFS and others do not disagree with the general themes of the Biodiversity and Natural Places Topic Paper and our members are fully committed to protecting biodiversity and already consider sustainability as an integral part of their business.

Agree that where applicable, new development should be supported where it can be demonstrated that the proposal will enhance or improve access to existing or neighbouring designations.

It is acknowledged that sites should take account of existing biodiversity and habitats, ensuring that areas of high biodiversity are protected during development, with opportunities explored to increase biodiversity on site where possible through the creation of nature networks and strengthening connections between them to support improved ecological connectivity.

Taylor Wimpey fully supports Biodiversity Net Gain (BNG) on-site mitigation can help build sustainable communities, create a better place to live and add value to developments. It is the right thing to do to help nature recover. We recognise that on-site mitigation can help build sustainable communities, create a better place to live and add value to developments.

Baird Family state that there is no minimum requirement for biodiversity net gain but it is noted that new development must deliver 'positive effects.'

Scottish Water

Scottish Water's Strategic Plan supports action to address the Nature Crisis.

Nature based solutions and blue-green infrastructure will increase water resilient places as outlined in the [Water-resilient places – surface water management and blue-green infrastructure policy framework](#).

Scotland's towns and cities have strengthened resilience to climate change by maximising their use of blue-green infrastructure to soak up and manage rainwater and keep it from overloading public sewer networks.

Further information on Scottish Waters Biodiversity Policy can be found in their [Biodiversity Report](#)

East Renfrewshire Council Response

The Council acknowledges and welcomes the supporting comments received and broad agreement with the general themes presented.

Scottish Water's commitment to addressing the nature crisis is welcomed. The link to the Water Resilient Places and the Biodiversity Report is noted and this evidence has been added to the Topic Paper.

In response to Nature Scot's comment, an improved definition of "local biodiversity sites" has been added to the evidence paper.

Statements of Dispute

SEPA

Disagree with parts of the evidence. There is insufficient evidence on the water environment in Topic Paper 2. SEPA recommends inclusion of evidence on the water environment:

- The riparian corridor layer.
- The Geomorphic risk layer – identifies sections along the river network at risk of channel adjustment.
- Riparian vegetation planting opportunities (25m raster) layer – identifies at a strategic scale the location of riverbanks which could be protected from erosion by improved riparian vegetation
- Flood Hazard Maps – identifies areas affected by flooding which may provide opportunities for nature networks
- Scottish Wetland Inventory layer – identifies known wetlands but is not comprehensive.
- Obstacles to fish migration (included in WFD classification) – identifies natural and artificial obstacles to migratory fish, therefore potential opportunities to remove artificial barriers and restore habitats.
- Water Environment Fund Projects: current, completed and future opportunities
- Water environment classification layers – provides current baseline information and could be used to identify opportunities to address issues and enhance nature networks.
- Natural Flood Management maps – identifies areas to be protected for their role in reducing flood risk and for opportunity mapping for nature-based solutions.

Homes for Scotland, ICENI on behalf of The Mac Mic Group, Miller Homes, Cala Management Ltd (CALA), ICENI on behalf of The Baird Family

Consider there are significant gaps in the evidence.

The observation that HFS members already deliver biodiversity enhancements in line with NPF4 Policies 3 and 4 is noted.

The Topic Paper states "Scotland is one of the most nature depleted countries in the world and East Ren is very much part of this tendency (p6)" – We disagree with this. We understand 2-3% of Scotland is built on.

LDP3 should actively identify areas of biodiversity loss to reverse and enhance nature networks within new development. LDP3 should give significant weight to nature networks and nature-based solutions. ERC should aim to work towards protecting and enhancing as many nature designations as possible. Where applicable, new development should be supported where it can be demonstrated that the proposal will enhance or improve access to existing or neighbouring designations.

Low scoring Local Biodiversity Sites could be enhanced through new development and the strengthening of green networks to achieve positive effects.

ERC should revise their open space strategy, woodland strategy and local biodiversity action plan to actively promote and facilitate the provision of nature-based enhancements within new areas of development.

The Topic Paper refers to surveys from 2015. The data should be the most up to date possible to accurately reflect local conditions.

The site selection process should consider other factors alongside matters relating to biodiversity so that a balanced and pragmatic planning judgement can be formed. It is vital that the presence of trees/woodland on sites that are promoted for development do not preclude the site from being considered as suitable of being developed. Trees & woodland can be protected and will improve the amenity and biodiversity value of a development. The presence of trees and woodland can be incorporated into the design of any site layout, thus contributing to the creation of quality places and providing an asset for the local community. When selecting sites for allocation within the LDP it is paramount that all factors are considered in the round in order that a balanced decision can be made.

HFS quote from NPF4 that development of LBS's will be supported where "development will not have significant adverse effects on the integrity of the area or the qualities for which it has been identified"; or "Any significant adverse effects on the integrity of the area are clearly outweighed by social, environmental or economic". The substantial contribution of housebuilding to the Scottish economy is given as a reason where the economic argument might outweigh the environmental one.

Construction Environment Management Plans are one tool to protect the environment during the construction phase.

It is important for the Topic Paper to recognise the need for evidence to be kept up to date.

Cala suggests low scoring LBS should on case by case basis have their status reviewed but new housing development provides opportunities to enhance LBS designations in line with NPF4 Policy 2 requirement for enhancement and restoration of habitats. Cala agree with the topic paper that that new development and biodiversity gains are not mutually exclusive, that development masterplans and design briefs should provide clear guidance to maximise biodiversity enhancements.

Cala stress the important socio-economic benefits of home building and that the site selection process must also consider the full range of factors other than biodiversity, including marketability and deliverability. This is particularly important for settlements within an area designated for its landscape quality and where this may affect the location. Considering both marketability and

deliverability will ensure development happens in the areas where there is a significant demand for housing.

Brindley Associates on behalf of The Mac Mic Group

Brindley request that the locations and boundaries of the Local Biodiversity Sites are easily available for developers to identify and download in vector format. Information pertaining to the reason for designation of an LBS, including special characteristics / features should also be identified, and made clear and accessible to developers. This will enable developers to identify where there is potential for development to have positive effects on an LBSs and appropriately mitigate any potential negative effects.

Brindley note there is no current biodiversity action plan and suggest an up-to-date Local Biodiversity Action Plan which identifies species and habitats of particular importance is critical. This would enable developers to strive to protect, enhance and create these key habitats and provide habitats for the identified species within their proposals. An LBAP will be valuable when the Scottish Biodiversity Metric is introduced.

Potential development sites where there is an opportunity to deliver high biodiversity gain and / or create and enhance desired Nature Networks within and beyond the sites should be targeted.

Brindley make comments on Topic paper 6 Greenbelt and Landscape Character which are relevant to the biodiversity topic paper. Comments include suggestions for the creation of new riparian nature networks that incorporate the Earn Water, Eaglesham Burn and the wetlands in the Flenders area. There are suggestions that new structural woodland corridors connect existing fragmented woodlands in the Newton Mearns South, Clarkston and Eaglesham areas.

East Renfrewshire Council Response.

The council has responded to the gaps identified by SEPA by amending the topic paper to include the missing information. The new SEPA information has also been added to update the Flood Hazard information covered in Topic Paper 019: Flood Risk and Water Management and the Natural Flood Management and the Geomorphic risk layer which is covered in Topic Paper 017: Blue Green infrastructure.

The evidence paper statement on East Renfrewshire's nature depletion does not refer to the area of land developed/undeveloped but to the poor condition of the environment caused by intensive agriculture, land management and invasive species. The context for the statement is taken from Nature Scot's National Biodiversity Strategy.

The Council agrees with statements that LDP3 should actively identify areas of biodiversity loss to reverse and enhance nature networks within new development and that low scoring biodiversity sites so that new development can take measures to reverse losses and make enhancements. LDP3 will identify and give significant weight to nature networks and nature-based solutions in line with NPF4. The Council agrees that new development can be sensitively planned to successfully integrate with existing woodland and enhance existing biodiversity.

There is already data available on the status of LBS sites. The comments on the potential of new development to integrate with and create new woodland are welcomed. The introduction by Nature Scot of a Scottish biodiversity net gain metric will support these ambitions.

Miller Homes and HfS reference to NPF4 policy on the balance between economic interest and biodiversity in planning decisions where the substantial contribution of housebuilding to the Scottish economy might be an instance where economic interest might outweigh the environmental one is noted, this matter would not be considered at this stage in the LDP3 process.

The statement regarding identification of the low scoring biodiversity sites will be a consideration at subsequent plan stages.

The Council notes the comments on the need to review the Open Spaces Strategy (OSS) and complete a Woodland Strategy and Biodiversity Action Plan. Forestry Scotland have indicated that they are content with the evidence outlined in Topic Paper 4 Woodland and Forestry which combines the Regional Woodland and Forestry Strategy with the East Renfrewshire Woodland Opportunities Report.

Work to review the OSS has commenced with a recent revision of the Open Space Audit, the finished document will be available to inform the proposed plan preparation stage of the LDP3. There are no immediate plans to produce an up-to-date Local Biodiversity Action Plan with the focus on identifying nature networks the primary focus for LDP3.

The concerns regarding the role of biodiversity in the site selection process are noted. The Site Assessment Framework is fully comprehensive and robust and takes a fully rounded view with the framework including 46 different criteria - biodiversity and nature are covered in criteria 9 to 15. The comment suggesting selection of development sites where there is opportunity to deliver high biodiversity gain is noted. The selection framework includes criteria 9 *"To what extent will the policy or proposal conserve, restore and enhance biodiversity?"* and criteria 10 *"To what extent will the policy or proposal facilitate the creation of nature networks and improve ecological connectivity?"* Biodiversity enhancement will therefore be a consideration of site selection within the wider context of the 46 criteria.

Regarding multiple comments on sites being deliverable and marketable the Site Section Framework stresses the importance of deliverability as a criterion for selection.

Comments on the use of construction Environment Management Plans to protect biodiversity during construction are noted, this evidence will be considered in more detail at later stages in the LDP process.

Brindley Associates detailed comments identifying locations where new development could enable the creation of new nature networks and woodland are noted and this approach would align with NPF4 policies 3, 4 and 6. At this stage the locations for new housing development are not yet known and will be determined at the Proposed Plan stage of the LDP3 process.

Brindley associates' comments on availability of information on Local biodiversity sites is noted. The location of [Local Biodiversity Sites](#) are viewable as a web map within the Topic Paper.

Gatecheck

The Council is of the view that there are no areas of dispute to be considered at Gate Check for this topic.

<p>East Renfrewshire LDP3 Issue Topic Paper 003 – Soils</p>	<p>NPF4 – Sustainable Places Policy 5: Soils</p>
<p>Information required by the Act regarding the issue addressed in this section</p>	<p><u>2019 Planning (Scotland) Act</u></p> <p>Section 15(5):</p> <ul style="list-style-type: none"> • The principal physical and environmental characteristics of the district. <p>Other statutory requirements:</p> <ul style="list-style-type: none"> • SEA (Environmental Report)
<p>Links to Evidence</p>	<ul style="list-style-type: none"> • National Planning Framework 4 (NPF4) (CD 102) • Scottish Biodiversity Strategy to 2045 (CD 094) • Scotland's Soils Database (CD 091) • Office for National Statistics - UK natural capital: peatlands (2019) (CD 065) • Scotland's Soils Capability for Agriculture (CD 090) • The Wildlife and Countryside Act 1981 (CD 157) • Clyde Peatlands (CD 172) • Clyde Valley Green Network (CD 185) • Clydeplan (2017) (CD 176) • East Renfrewshire Wind Energy Study 2012 (CD 274)
<p>Summary of Evidence</p>	
<p>This Topic Paper provides an overview of the soil resource in East Renfrewshire and the implications for LDP3. It gives an overview of the role of soils in our ecosystem, the location of sensitive carbon rich soils and when soils should be considered as a constraint or consideration when planning for development.</p> <p>Section 1 provides an overview of the policy context as provided by NPF4, Scottish Biodiversity Strategy and the adopted LDP2. With regards to soils this requires identifying the locations of locally, regionally, nationally and internationally valued soils including land of lesser quality that is culturally or locally important for primary use.</p> <p>Section 2 provides an overview of the soils resource. East Renfrewshire's soils are an important natural resource, each soil type has been formed by the underlying geology, local climate and altitude and how the soil is managed. The most sensitive soils are the carbon rich soils found primarily in the higher moorland which borders East Ayrshire. These have formed slowly in cold</p>	

and wet conditions leading to the formation of peat. There are smaller pockets of carbon rich soil found on the plateau of the Fereneze Hills above Neilston as shown in Figure 1 of the report.

These carbon rich soils contain varying quantities of peat, from deep peat with associated peatland habitats to peaty soils which are carbon rich but may not support peatland habitats. There are no class 2 or class 4 peat soils in East Renfrewshire as shown by Figure 2 of the report.

There is no land classified as prime agricultural land classes 1 to 3.1 in East Renfrewshire.

East Renfrewshire's peatlands are home to several rare species of plants and animals. These include short eared owl, merlin, hen harrier and black grouse; all are Red listed species from Schedule 1 of listed species of The Wildlife and Countryside Act. Almost 2500 ha, 78% of the total area of peat soils, are designated in the LDP2 as Local Biodiversity sites.

Section 3 sets out the implications for LDP3, which have been informed by the analysis and outputs in the report.

The LDP3 Evidence Report SEA Scoping Report (April 2024) defines the scope/level of detail to be covered in the Environmental Report for the Proposed Plan. Section 4 provides an overview of the environmental characteristics of East Renfrewshire. Table 2 sets out the SEA objectives relating to each SEA theme which includes a section on Soil and Geology Factors.

Summary of Stakeholder Engagement

Section 4 'Engagement Statement' of the Evidence Report summarises the various engagement and consultation activities that have been undertaken to inform the Evidence Report. This includes collaborative working with Key Agencies and other stakeholders in the preparation of Topic Papers and the Play Sufficiency Assessment, and other place-based engagement and workshops.

A series of Topic Papers were prepared structured around the sustainable, liveable and productive places themes of National Planning Framework 4.

Wider external engagement with stakeholders commenced on 12th April and ended on 10th May 2024, inviting people interested in LDP3 to review the Topic Papers that cover their areas of interest and to share their comments. The aim of the engagement was to establish areas of agreement or disagreement and any additional evidence that should be taken into account.

The Topic Papers were published on the Council's Local Development Plan Hub on Commonplace, and through the Council's LDP3 website, Facebook and Twitter account and email notifications were sent to individuals and organisations listed on the LDP contact database.

The SEA Scoping Report was submitted to the SEA Gateway consultation authorities on 19th April for a 6-week consultation period. The Gateway Authorities were generally supportive of the Scoping Report subject to a few points for consideration for the Environmental Report to be prepared alongside the Proposed Plan. Comments are summarised in Section 4 Table 1 of the Evidence Report.

Summary of Implications for the Proposed Plan

The location of peatlands and carbon rich soils in upland and plateau areas means the most likely development pressure will come from proposals for renewable energy, primarily wind. NPF4 policy 5 Soils c) states that *Development proposals on peatland, carbon-rich soils and priority peatland habitat will only be supported for:*

- i) *Essential infrastructure and there is a specific locational need and no other suitable site.*
- ii) *The generation of energy from renewable sources that optimises the contribution of the area to greenhouse gas emissions reductions targets*
- iii) *Small-scale development directly linked to a rural business, farm or croft;NP*
- iv), *Supporting a fragile community in a rural or island area; or*
- v) *Restoration of peatland habitats.*

The Whitelee area which contains East Renfrewshire's largest and best quality area of peatlands also hosts the UK's largest onshore wind farm. The two land uses co-exist and the windfarm farm operator has restored over 1000 ha of degraded peatland in the heart of the windfarm area.

LDP2 includes a Spatial Framework for Wind energy which identifies land where wind energy development is likely to be acceptable. The spatial framework was prepared within the context of policy 10 in the former [Clydeplan \(2017\)](#) and informed by the Council's Wind Energy Study 2012 (CD03).

The LDP2 Spatial Framework for Wind Energy gives "significant protection" to areas of Class 1 nationally important peatland habitat from wind energy development. There is therefore a divergence between the LDP2 and NPF4 Policy 5c which supports the generation of renewable energy on peatland, carbon-rich soils and peatland habitat, subject to a site specific assessment to identify the quality and condition of carbon rich soils, the likely effects of the proposal on peatlands and the likely net effects of the development on climate emissions and loss of carbon.

There will be a need to amend LDP3 to align with NPF4 and review the Spatial Framework to include Class 1 areas of peatland. To ensure that peatland and carbon rich soils are protected, the LDP3 should link to guidance detailing the information required when a development proposal is proposed on carbon rich soil. This guidance should include Nature Scot's Developing with Nature Guidance with a focus on the *mitigation hierarchy*, peat management plans, and the production of assessments calculating the net carbon emissions from any development on a peat soil.

Where development is on mineral soils Construction Environment Management Plans (CEMP) are an important tool in safeguarding onsite natural resources during construction works.

There are strong cross overs with Policy 3 *biodiversity* and Policy 2 *climate*. LDP3 should ensure these connections are clear and not contradictory. Peatlands which are currently local biodiversity sites should be considered for inclusion as part of the wider nature networks which are in the process of being identified across the Glasgow City Region.

Statements of Agreement / Dispute

Statements of Agreement.

Nature Scot

Broadly Agree with the evidence.

ICENI on behalf of the Baird Family

Agree broadly with the evidence. It is agreed that valued soils are protected and restored where possible.

The following is acknowledged:

There is no land classified as prime agricultural land classes 1 to 3.1 in East Renfrewshire, therefore NPF4 Policy 5 b) development proposals on prime agricultural land will not be relevant to East Renfrewshire.

There are no class 2 or class 4 peat soils in East Renfrewshire.

The location of peatlands and carbon rich soils in upland and plateau areas means the most likely development pressure will come from proposals for renewable energy, primarily wind.

Scottish Water

Efforts to protect carbon-rich soils, restore peatlands and minimise disturbance to soils from development are strongly supported. Managing restoration of peatlands carefully is vital as damaged, poor condition or eroded peatland can have a significant impact on drinking water quality supplies of upland sources from increases in dissolved organic carbon (DOC). Scottish Water welcome early engagement with our Sustainable Land Management Team to determine if development proposals impact on drinking water catchments.

East Renfrewshire Council Response

The Council acknowledges and welcomes the supporting comments received and broad agreement with the general themes presented.

The Council notes Scottish Water's comments on damaged peatlands impacting on drinking water quality and has added additional text on this to the topic paper. This subject is also addressed in Topic Paper 19 SFRA and Water Management.

Statement of disagreement

Homes for Scotland, ICENI on behalf of the Baird Family, Miller Homes

Considers there are significant gaps in the evidence

LDP3 should recognise there are tools to minimise the impact of development on soil and the disturbance of peat. The Topic Paper could acknowledge that risks can be controlled a Construction Environment Management Plan (CEMP).

To help ensure that peatland and carbon rich soils are protected, HFS supports the inclusion of guidance in LDP3, with reference to Nature Scot's Developing with Nature Guidance, detailing the information required when a development proposal is proposed on carbon rich soil.

To meet the default Minimum All-Tenure Housing Land Requirement (MATHLR) Topic Paper 13: Housing recognises housing is likely be delivered in greenfield locations. The Council cannot on one hand advocate greenfield development but then use soils as a barrier or development. There must be a balance.

It is important for the Topic Paper to recognise the need for evidence to be kept up to date and any plan and decisions must be able to be made in this context.

HFS notes the divergence between NPF4 Policy 5c and LDP2 which gives significant protection to areas of Class 1 nationally important peatland habitat from wind energy development. It is positive that the Topic Paper recognises the need to amend LDP3 to ensure it aligns with NPF4, which is vital in ensuring that there are no unnecessary restrictions to development put in place.

NPF4 Policy 5c sets out scenarios in which development proposals on peatland, carbon rich soils and priority peatland habitat will be supported, including for "essential infrastructure and there is a specific locational need and no other suitable site". The socio-economic benefits of home building cannot be understated. They contribute millions of pounds annually to infrastructure investment across the district. As outlined in the report commissioned by HFS, and published in March 2022,

<https://homesforscotland.com/download/the-social-and-economic-benefits-of-home-building-in-scotland/>).

East Renfrewshire Council Response

The Council agrees that Construction Environment Management Plans (CEMP) can be an important tool in safeguarding onsite natural resources during construction. The use of CEMPs during construction will be added to the evidence in the Topic Paper.

The Site Appraisal Framework provides a comprehensive assessment criteria for selection of sites. Soils will not be used as a "barrier" but will be considered using criteria 32 to 36 of the 46 criteria in the Framework. The Landscape Character Assessment (LCA), Site Assessment Framework and SEA will be crucial in identifying spatial options during the Proposed Plan stage of the process.

It is worth noting that the carbon rich soils that NPF4 policy 5 seeks to protect are found in remote moorland locations and unlikely to be found in locations of interest to the house building industry.

The statement of economic benefits of house building by HFS and Miller Homes is noted. The site assessment process requires the submission of an Economic Benefits statement allowing presentation of the economic case.

<p>East Renfrewshire LDP3 Issue Topic Paper 004 - Woodland and Forestry</p>	<p>NPF4 – Sustainable Places Policy 6: Forestry, Woodlands and Trees</p>
<p>Information required by the Act regarding the issue addressed in this section</p>	<p>2019 Planning (Scotland) Act</p> <p>Section 15(5):</p> <ul style="list-style-type: none"> • The principal physical and environmental characteristics of the district. <p>Other statutory requirements:</p> <ul style="list-style-type: none"> • SEA (Environmental Report) • Forestry and Woodland Strategy
<p>Links to Evidence</p>	<ul style="list-style-type: none"> • Glasgow City Region Forestry and Woodland Strategy 2020 (CD 182) • Opportunities for Increasing Canopy Cover on Local Authority Land Holdings, East Renfrewshire Council (March 2024) (Summary Report) (CD 198) • National Planning Framework 4 (NPF4) (CD 102) • SEPA Handbook of Natural Flood Management (CD 146) • East Renfrewshire Local Development Plan 2 (2022) (CD 206) • Scottish Native Woodland Survey (CD 129) • East Renfrewshire ancient woodland sites (CD 208) • East Renfrewshire Native Woodlands (CD 283) • Local biodiversity sites with some woodland component (CD 284) • Historic Environment Scotland Inventory of Gardens and Designed Landscapes (CD 032) • East Renfrewshire Tree Preservation Orders (CD 273) • Clyde Climate Forest (CD 171) • Potential Woodland Connectivity (CD 285) • Scotland’s Forestry Strategy (2019-2029) (CD 077) • Scottish Water Forestry Activities Near Water Assets (CD 135)

Summary of Evidence	
<p>This Topic Paper provides an overview of the location, area and number of woodlands, including ancient woodlands, and protected trees in East Renfrewshire. In recent years woodlands and forestry have become an area of increased interest for local development plans. The 2019 Planning (Scotland) Act requires local authorities to prepare a forestry and woodland strategy, placing woodlands at a juncture where environmental policy, forestry policy and planning policy converge.</p> <p>Woodlands take centuries to mature, a mature woodland is an irreplaceable resource. Woods and trees of any age trees provide us with environmental and social health and well-being benefits; storing carbon emissions, supporting the nature recovery, managing rainfall, cleaning air pollution, providing shade and shelter and providing timber, jobs and places for outdoor recreation.</p> <p>Section 1 provides an overview of the policy context for woodland and forestry as provided by the 2019 Planning (Scotland) Act, NPF4, SEPA’s Handbook of Natural Flood Management and the adopted LDP2.</p> <p>Section 2 provides information on location, area and number of woodlands and protected trees in East Renfrewshire. As part of the Glasgow City Region area East Renfrewshire uses the ‘Forestry and Woodland Strategy’ 2020 for the Glasgow City Region to guide decision making. Used in conjunction with the detailed Opportunities for Increasing Canopy Cover on Local Authority Land Holdings in East Renfrewshire (March 2024) (Summary Report) (CD04), Tree Protection Areas and nature designations these documents fulfil the role of a local Forestry and Woodland Strategy.</p> <p>East Renfrewshire has one of the lowest levels of native woodland cover in Scotland, with less than 1% of the district supporting native woodland cover, this compares unfavourably with other authorities in the Glasgow city Region which average 3.5% native woodland cover. The Scottish Native Woodland Survey identifies 146 native woodland sites in East Renfrewshire covering 369 ha. There are 63 ancient woodland sites in East Renfrewshire covering 249 ha and 0.3% of the Council area.</p> <p>East Renfrewshire has extensive commercial forestry concentrated on the moorland plateaux and hills to the south of Eaglesham and Neilston. These forests make an important contribution to the rural area, as well as contributing to a sustainable timber supply to meet the needs of Scotland’s growing timber processing sector. There are 1100 ha of commercial forestry in East Renfrewshire covering 2.5% of the Council area.</p> <p>Sixty two of the 119 designated local biodiversity sites contain some woodland interest within their boundary.</p> <p>There are 73 Tree Protection Orders in place to protect individual trees or groups of trees which make a significant contribution to the landscape and character of the area</p> <p>The Council has planted or facilitated the planting of 33 “Wee Woods”. Over 10,000 trees have been planted by 500 school pupils and community volunteers. Since 2015 there have been 14 Forest Scotland approved schemes for new woodlands. These new schemes have created 442 ha of new woodland, including 211 ha of broadleaved trees.</p>	

Section 3 sets out the implications for LDP3, which have been informed by the analysis and outputs in the report.

The LDP3 Evidence Report SEA Scoping Report (April 2024) defines the scope/level of detail to be covered in the Environmental Report for the Proposed Plan. Section 4 provides an overview of the environmental characteristics of East Renfrewshire. Table 2 sets out the SEA objectives relating to each SEA theme which includes a section on Trees and Woodland factors within the Biodiversity and Nature Topic.

Summary of Stakeholder Engagement

Section 4 'Engagement Statement' of the Evidence Report summarises the various engagement and consultation activities that have been undertaken to inform the Evidence Report. This includes collaborative working with Key Agencies and other stakeholders in the preparation of Topic Papers and the Play Sufficiency Assessment, and other place-based engagement and workshops.

A series of Topic Papers were prepared structured around the sustainable, liveable and productive places themes of National Planning Framework 4.

Wider external engagement with stakeholders commenced on 12th April and ended on 10th May 2024, inviting people interested in LDP3 to review the Topic Papers that cover their areas of interest and to share their comments. The aim of the engagement was to establish areas of agreement or disagreement and any additional evidence that should be taken into account.

The Topic Papers were published on the Council's Local Development Plan Hub on Commonplace, and through the Council's LDP3 website, Facebook and Twitter account and email notifications were sent to individuals and organisations listed on the LDP contact database.

The SEA Scoping Report was submitted to the SEA Gateway consultation authorities on 19th April for a 6-week consultation period. The Gateway Authorities were generally supportive of the Scoping Report subject to a few points for consideration for the Environmental Report to be prepared alongside the Proposed Plan. Comments are summarised in Section 4 Table 1 of the Evidence Report.

Summary of Implications for the Proposed Plan

NPF4 provides a robust suite of policies to enhance, expand and protect woodlands. These policies are largely compatible with the equivalent policies in LDP2. NPF4 does introduce some new policy dimensions.

NPF4 introduces a requirement that development on land identified in the Forestry and Woodland Strategy as being suitable for woodland creation will only be supported when there is an enhancement and improvement of woodlands and planting of new trees on the site. This requirement could have implications for any development on greenbelt release as much of the green belt falls within the area identified as the Strategy's preferred area for new woodland. New development and new woodland are not mutually exclusive, new development is an opportunity for woodland creation, and where it is designed and delivered well it produces the "positive effects" for biodiversity required by NPF4 Policy 3.

LDP3 should identify where new woodland associated with development can create and strengthen nature networks. NPF4 proposes nature networks as a key tool to reverse biodiversity loss. The site assessment process could consider using a criterion which evaluate what potential a site has for new woodland creation and strengthening nature networks.

The intention that new style LDP's move to content displaying masterplans and design briefs creates an opportunity to provide design guidance that ensures woodlands are fully integrated into new development areas and contribute to nature networks where possible.

LDP3 should ensure that the policy overlaps with Policy 1 and 2 Climate change and Policy 3 and 4 biodiversity and natural places are explicit and synergies are maximised.

LDP3 should identify woodland projects on Council owned land that contribute to nature networks, the creation of new habitats and the restoration of degraded habitats. This work could be combined with a revised open space strategy and production of an updated local biodiversity action plan.

Statements of Agreement / Dispute

Statements of Agreement

Forest Scotland Central Conservancy

Broadly agree with the evidence presented regarding the protection of existing woodland and trees, and the evidence regarding opportunities for new woodland creation and tree planting. The topic paper statement that, "new development is an opportunity for woodland creation" is particularly welcomed.

Nature Scot

Agree broadly with the evidence.

Taylor Wimpey, ICENI On behalf of East Renfrewshire Home Builder Consortium (Mac Mic Group; Miller Homes; Robertson Homes; Taylor Wimpey), ICENI on behalf of The Mac Mic Group, Miller Homes,

Agree broadly with the evidence. Agree that development can create new and enhance existing woodlands and strengthen nature networks and encourage biodiversity on site. Agree that LDP3 should identify where new woodland associated with development can create and strengthen nature networks. NPF4 proposes nature networks as a key tool to reverse biodiversity loss.

ICENI on behalf of The Mac Mic Group also agree that the extent of the proposed priority areas for Clyde Climate Forest planting as this is a logical defensible natural boundary to the greenbelt.

Scottish Water

Broadly agree with evidence but advise that a small area of ancient woodland creation is within the Dusk Water catchment boundary which supplies Muirdykes Water Treatment works, if tree guards are used they should be biodegradable or if not biodegradable they should be removed and disposed of in line with the Waste Management Regulations. It is requested that the "[Guidance on Forestry Activities Near SW Assets](#)" is taken into account. A link to this document will be added to the evidence paper.

East Renfrewshire Council Response

The multiple positive comments on the potential for integrating new development with woodland creation/enhancement and strengthening of nature networks are welcomed.

The Mac and Mic Group suggestion of the proposed Clyde Climate Forest forming a logical defensible boundary are noted, although the Clyde Climate Forest is indicative.

The comments on integrating new development with woodland creation/enhancement are welcomed and align with NPF4 policy.

Scottish Water's suggestion to include their guidance on forestry operations in drinking water catchments has been added to the Topic Paper under the section titled 'Scotland's Forestry Strategy 2019-2029'.

Statements of Dispute

Taylor Wimpey, ICENI On behalf of East Renfrewshire Home Builder Consortium (Mac Mic Group; Miller Homes; Robertson Homes; Taylor Wimpey), ICENI on behalf of The Mac Mic Group, Miller Homes, Taylor Wimpey

The site assessment process should consider a criterion which evaluates what potential a site has for new woodland creation and strengthening existing nature networks. New development provides an opportunity for the delivery of new woodlands which contributes to a 'positive effect' for biodiversity enhancements.

Historic Environment Scotland

Consider there is a gap in the evidence in this topic paper which does not specifically refer to the two sites; Rouken Glen Park and Greenbank Gardens listed on the Inventory of Gardens and Designed Landscape.

East Renfrewshire Council Response

The suggested gap in the evidence regarding woodland creation and nature networks in the Site Assessment Framework is a positive suggestion. Reference has been added to criteria 9 within the Biodiversity and Nature theme.

The gap evidence identified by Historic Environment Scotland is accepted and the Inventory of Gardens and Designed Landscape has been added to the evidence report with a cross reference to Topic Paper 005: Historic Assets which outlines further information.

Gate Check

The Council is of the view that there are no areas of dispute to be considered at Gate Check for this topic.

<p>East Renfrewshire LDP3 Issue Topic Paper 005 - Historic Assets and Places</p>	<p>NPF4 – Sustainable Places Policy 7: Historic assets and places</p>
<p>Information required by the Act regarding the issue addressed in this section</p>	<p><u>2019 Planning (Scotland) Act</u></p> <p>Section 15(5):</p> <ul style="list-style-type: none"> • The principal-built heritage characteristics of the district. <p>Other statutory requirements:</p> <ul style="list-style-type: none"> • SEA (Environmental Report)
<p>Links to Evidence</p>	<ul style="list-style-type: none"> • National Planning Framework 4 (NPF4) 2023 (CD 102) • Historic Environment Policy for Scotland (HEPS) (CD 028) • Historic Environment Scotland Our Past, Our Future (CD 035) • Historic Environment Scotland Pointing the Way to the Future (CD 036) • Historic Environment Scotland Your Historic Place Lens (CD 037) • Historic Environment Scotland Managing Change in the Historic Environment (CD 034) • Historic Environment Scotland Managing Change Guidance Note on Asset Management (CD 033) • Built Environment Forum for Scotland (BEFS) and Historic Environment Scotland Sustainable Investment Tool (SIT) (CD 007) • East Renfrewshire adopted Local Development Plan 2 (March 2022) (CD 206) • HES Portal (CD 027) • Buildings at Risk Register for Scotland (CD 005) • Designed Landscapes of the Recent Past (CD 031) • Site Assessment Framework (SD 001)
<p>Summary of Evidence</p>	
<p>This Topic Paper provides an overview of the Built environment context and sets out the key conservation designations in East Renfrewshire. The built heritage brings many social, cultural, educational and economic benefits to our communities; contributing to our history and</p>	

education, local distinctiveness, placemaking and quality of life and helps to support the growth of tourism and leisure. LDP3 has a key role to play in the overall protection of the historic environment and ensuring that its other policies and proposals do not lead to direct or indirect impacts on such designations.

Section 1 provides an overview of the Historic Environment policy context as provided by Historic Environment Scotland strategies, NPF4 and the Council's adopted LDP2.

Section 2 provides an overview of East Renfrewshire's historic environment and sets out the key conservation designations. This comprises ancient monuments, archaeological sites and landscapes, historic buildings, townscapes, parks, gardens and designed landscapes and other features, and comprises both statutory and non-statutory designations.

East Renfrewshire contains:

- 138 listed buildings, including 5 Category A listed buildings which are of national importance;
- 5 conservation areas;
- 2 gardens and designed landscapes; and
- 11 scheduled monuments.

Section 3 sets out the implications for LDP3, which have been informed by the analysis and outputs in the report.

The LDP3 Evidence Report SEA Scoping Report (April 2024) defines the scope/level of detail to be covered in the Environmental Report for the Proposed Plan. Section 4 provides an overview of the environmental characteristics of East Renfrewshire. Table 2 sets out the SEA objectives relating to each SEA theme which includes a section on Cultural Heritage considerations.

Summary of Stakeholder Engagement

Section 4 'Engagement Statement' of the Evidence Report summarises the various engagement and consultation activities that have been undertaken to inform the Evidence Report. This includes collaborative working with Key Agencies and other stakeholders in the preparation of Topic Papers and the Play Sufficiency Assessment, and other place-based engagement and workshops.

A series of Topic Papers were prepared structured around the sustainable, liveable and productive places themes of National Planning Framework 4.

Wider external engagement with stakeholders commenced on 12th April and ended on 10th May 2024, inviting people interested in LDP3 to review the Topic Papers that cover their areas of interest and to share their comments. The aim of the engagement was to establish areas of agreement or disagreement and any additional evidence that should be taken into account.

The Topic Papers were published on the Council's Local Development Plan Hub on Commonplace, and through the Council's LDP3 website, Facebook and Twitter account and email notifications were sent to individuals and organisations listed on the LDP contact database.

The SEA Scoping Report was submitted to the SEA Gateway consultation authorities on 19th April for a 6-week consultation period. The Gateway Authorities were generally supportive of the Scoping Report subject to a few points for consideration for the Environmental Report to be

prepared alongside the Proposed Plan. Comments are summarised in Section 4 Table 1 of the Evidence Report.

Summary of Implications for the Proposed Plan

LDP3 has a key role to play in the overall protection of the historic environment and ensuring that its other policies and proposals do not lead to negative direct or indirect impacts on such designations. It is vital that the area's heritage assets continue to be protected from inappropriate development and improved through policies.

LDP3 should continue to seek to ensure development proposals address how the historic environment adds to the sense of place for new development. Development should respond to and support valued local historic character. The LDP should continue to promote and reinforce local distinctiveness through high quality design.

It is critical that the historic environment is fully integrated in the site assessment framework (SD 001) and that proposals demonstrate explicitly, a clear understanding of the significance of heritage assets and their setting.

Climate change and a focus on energy efficiency is inevitably leading to changes to the historic environment. It is also widely recognised and accepted that the historic environment should play its part in meeting these current and future challenges. However, it is vital that changes are consistent with the aims of heritage protection and reflect the global climate and nature crises of Policies 1 and 2 of NPF4. In accepting that some change will be necessary it is critical that this is carefully managed so that the historic environment and its heritage assets are sustained.

Statements of Agreement / Dispute

Statements of Agreement

Public - Billy Clark

A single response was received from a member of the public who broadly agrees with the evidence.

Historic Environment Scotland

Welcome the preparation of this topic paper on historic assets and places in the East Renfrewshire Council area and setting out the topic's implications for the emerging Local Development Plan 3. The data provided within the topic paper will serve to provide an important summation of the evidence base for the historic environment.

Welcome the Council's aspiration to reduce the number of category A-listed buildings that have fallen into a state of disrepair.

We welcome the proposed production of conservation area appraisals, preferably in conjunction with a management plan, because they play an important role in managing change in the historic environment.

Welcome comments about the need to fully integrate the historic environment in the site assessment methodology.

Welcome the recognition that it will be critical to carefully manage change so that the historic environment and its heritage assets are sustained. Reference is made to the Guide to Climate Change Impacts on the Scotland's Historic Environment and Historic Environment Scotland Climate Change Risk Assessment.

Scottish Water

Support the need to preserve historic characteristics of places. We welcome an approach which focuses on incorporating climate change and energy efficiency when considering the historic environment to enable resilience for future climates.

ICENI on behalf of East Renfrewshire Home Builder Consortium (Mac Mic Group; Miller Homes; Robertson Homes; Taylor Wimpey), ICENI on behalf of The Mac Mic Group , Miller Homes

Agree broadly with the evidence. LDP3 should ensure development proposals promote the sense of place. Development should respond to, and support valued local historic character. The LDP should continue to promote and reinforce local distinctiveness through high quality design of new development.

As part of the spatial strategy evidence base, ERC should undertake an assessment of historic assets and places to understand their cultural significance. This would then inform how new proposals, within the vicinity of historic assets can be sensitively designed to mitigate any impacts.

Development proposals should be accompanied by further assessments to identify the likely visual or physical impact of any proposals for change, including cumulative effects and provide a sound basis for managing the impacts of change.

Proposals should be supported where it can be demonstrated there is negligible/positive impact on the historic asset.

Future guidance / policy should support development design that reflects the locality and any heritage assets. This will help promote and create distinctive places.

Development should be supported where historic assets are enhanced as places in terms of access to and creating a destination. New development should celebrate local heritage with reference to design, materials, local art and increasing access to assets.

East Renfrewshire Council Response

The Council acknowledges and welcomes the supporting comments received.

The Council agrees that LDP3 should continue to promote and reinforce local distinctiveness through high quality design of new development. The Council notes comments about the assessment of future proposals which will help inform the Proposed Plan approach. The Topic Paper provides a comprehensive overview of the historic environment. The Council will continue to work closely with Historic Environment Scotland to ensure proposals reflect the historic nature of places, spaces and buildings.

Statements of Dispute

Historic Environment Scotland

Historic Environment Scotland agreed the topic paper was acceptable subject to:

1. Recommend replacing references to 'built heritage designations' and 'built environment' with 'historic environment'.
2. Recommend adding a qualifying adjective (such as negative/ detrimental) in front of direct and indirect impacts, where it is set out in the document that 'its other policies and proposals do not lead to direct or indirect impacts on such designations'.
3. Useful links to the historic environment policy and guidance could be added in this section.
4. Listed Buildings - Small discrepancy between our figures for the number of listed buildings in East Renfrewshire. The topic paper cites a total of 93 category B listed buildings while our records show that there are 92 such designations within the area.
5. Buildings at Risk - discrepancy between the figures provided in the topic paper and our number. The topic paper identifies 8 buildings recorded as being at risk in the East Renfrewshire Council area whereas our figures are that there are 9 At-Risk buildings on the register. Information on Buildings at Risk and forthcoming vacant church buildings is provided.
6. Information is provided on Notable development pressure trends. .
7. Information on current grants and projects is provided.
8. Reference is made to the Designed Landscapes of the Recent Past study.
9. A glossary of terms and definitions is provided in the response.
10. The SEA Consultation Authorities proforma could be used to inform environmental assessments.

ICENI on behalf of East Renfrewshire Home Builder Consortium (Mac Mic Group; Miller Homes; Robertson Homes; Taylor Wimpey), ICENI on behalf of The Mac Mic Group

Development proposals should be accompanied by an assessment which is based on an understanding of the cultural significance of the historic asset and/or place and how the proposal is sensitively designed to mitigate any impact on historic assets.

East Renfrewshire Council Response

In response to the additional points made Historic Environment Scotland the Council responds as follows:

1. The topic paper has been revised to refer to the 'historic environment' rather than built heritage designations' and 'built environment'.
2. 'Negative' has been added in front of direct and indirect impacts.
3. Current HES Strategies, Guidance and Tools have been added to the topic paper to reflect HES comments. The Guide to Climate Change Impacts on the Scotland's Historic Environment and Historic Environment Scotland Climate Change Risk Assessment have been added to Topic Paper 1 - Climate Mitigation and Adaptation.
4. Historic Environment Designations data on Listed Buildings has been updated to reflect HES recommendations.
5. Historic Environment Designations data on Buildings at Risk and on forthcoming vacant church buildings has been added to the Topic Paper.
6. Notable development pressures have been reflected in the Topic Paper.

7. References to the Designed Landscapes of the Recent Past study have been added to the Topic Paper.
8. Information on current grants and projects has been added to the Topic Paper.
9. Definitions have been updated to reflect HES response.
10. The SEA Consultation Authorities proforma informs and is reflected in the Council's LDP3 site assessment framework.

The requirement for proposals to prepare a historic impact assessment will be added to the Site Assessment Framework.

Gate Check

The Council is of the view that there are no areas of dispute to be considered at Gate Check for this topic.

<p>East Renfrewshire LDP3 Issue Topic Paper 006 - Green Belts and Landscape Character</p>	<p>NPF4 – Sustainable Places Policy 8: Green Belts Policy 17: Rural Homes</p>
<p>Information required by the Act regarding the issue addressed in this section</p>	<p><u>2019 Planning (Scotland) Act</u></p> <p>Section 15(5):</p> <ul style="list-style-type: none"> • The principal physical and environmental characteristics of the district. <p>Section 15(5):</p> <ul style="list-style-type: none"> • The housing needs of the population of the area, including in particular, the needs of persons undertaking further and higher education, older people and disabled people; • The availability of land in the district for housing, including for older people and disabled people; • The desirability of allocating land for the purposes of resettlement; and • The extent to which there are rural areas within the district in relation to which there has been a substantial decline in population. <p>Section 16(2)(ab):</p> <ul style="list-style-type: none"> • In preparing the LDP the planning authority are to have regard to the list published under section 16E of persons seeking to acquire land in the authority's area for selfbuild housing. <p>Regulation 9 - Have regard to:</p> <ul style="list-style-type: none"> • any LHS <p>Other statutory requirements:</p> <ul style="list-style-type: none"> • LHS which is required by the Housing (Scotland) Act 2001, as amended, to be informed by an assessment of housing provision that is carried out by a HNDA.
<p>Links to Evidence</p>	<ul style="list-style-type: none"> • National Planning Framework 4 (NPF4) 2023 (CD 102) • East Renfrewshire Adopted Local Development Plan 2 (LDP2) (CD 206) • East Renfrewshire Green Belt and Landscape Character GIS interactive map (CD 242)

- [East Renfrewshire adopted Local Development Plan 2 \(LDP2\) \(2022\)](#)
- [East Renfrewshire LDP2 Examination Report \(2021\)](#) (CD 248)
- [NatureScot National Landscape Character Assessment](#) (CD 058)
- Green Belt Landscape Character Assessment (2016) (CD 243)
- Green Belt Landscape Character Assessment Annex of Figures (2016) (CD 243a)
- [Scottish Government Urban Rural Classification 2020 \(CD 118\)](#)
- [Scotland's Census 2011](#) (CD 078)
- [Scotland's census 2022](#) (CD 081)
- Site Assessment Framework (SD 001)
- Rural Settlement Profiles (SD 005)

Summary of Evidence

This Topic Paper provides an overview of current and previous Green Belt studies, outlines how the landscape was analysed and evaluated and what this revealed in terms of constraints and opportunities. An overview of key issues identified for rural homes is also discussed. The East Renfrewshire green belt has been a successful strategic management tool in guiding new development and ensuring that the landscape setting and identity of settlements has been protected.

Section 1 provides an overview of the East Renfrewshire Green Belt. This section identifies that most of the landscape within East Renfrewshire is designated as Green Belt or countryside. This is in recognition of the importance and inherent sensitivity of this landscape as a setting for the urban area. Opposing this there is the requirement for developable land to meet housing and economic needs.

Section 2 outlines the policy context as provided by NPF4.

Section 3 provides an overview of Green Belt Reviews. The East Renfrewshire Local Development Plan (LDP1) was adopted in June 2015 and was informed by the 2005 Green Belt Landscape Character Assessment prepared for the Council by Land Use Consultants. A review of the boundary was undertaken which provided opportunities for significant new development through Strategic Development Opportunities but also put in place a robust and defensible green belt boundary, providing a defence to unplanned growth and reflecting a long-term settlement strategy.

An updated Green Belt and Landscape Character Assessment (LCA) was undertaken in 2016 and informed the Strategy and green belt boundary for LDP2.

LDP2 promoted a compact strategy of consolidation and regeneration of existing places and communities, with a focus on brownfield and vacant sites. The Plan carried forward development opportunities identified in LDP1 but did not propose any new housing sites or amendments to the green belt boundary.

Section 4 summarises Landscape Character Assessments (LCA). The landscape character of East Renfrewshire has been assessed through three landscape character assessments, the Glasgow and Clyde Valley Landscape Assessment (1999) which was further augmented by the East Renfrewshire Landscape Character Assessment (2005) and in turn by the review of this assessment in 2016. The key aspects of the 2016 LCA are summarised in tables (1-3) and figures (1-3) of the Topic Paper and the GIS interactive map. The LCA also sets out a summary for each settlement identifying the key features and characteristics of its landscape context as shown in Table 4 of the Topic Paper.

Section 5 provides an overview of the Scottish Government Urban Rural Classification 2020. This shows that the majority of East Renfrewshire falls within the accessible rural areas category. However, the majority of the population is located within the large urban areas category. This pattern reflects the split in urban and rural land in the area.

Section 6 outlines the LDPs approach to rural homes. The rural hinterland to the south of East Renfrewshire comprises the villages of Uplawmoor, Neilston, Waterfoot and Eaglesham which perform a valuable role providing services and facilities for their local communities. Table 7 of the Topic Paper shows that there has been a general increase in the population for the rural settlements and none of have experienced a significant reduction in their population. The Rural Settlement Profiles and Topic Paper 12: Local Living also highlights that the challenges of providing additional services and facilities in rural areas and that locating services strategically to serve a group or cluster of settlements needs to be considered through LDP3.

Section 7 provides an overview of Green Belt monitoring for applications determined in the green belt. The majority of applications have been approved in accordance with the Plans strategy. However, since 2011 there has been an increase in the urban area and loss of Green Belt due to the urban expansion around Newton Mearns, Barrhead South and Neilston where land was released from the Green Belt for development, resulting in a reduction of the Green Belt approximately 176ha.

Section 8 sets out the implications for LDP3, which have been informed by the analysis and outputs in the report.

Other issues:

A summary of the key issues identified for Specialised housing provision; self-build housing; and links with the Council's Local Housing Strategy are outlined in detail in the Topic Paper 13: Housing.

The LDP3 Evidence Report SEA Scoping Report (April 2024) defines the scope/level of detail to be covered in the Environmental Report for the Proposed Plan. Section 4 provides an overview of the environmental characteristics of East Renfrewshire. Table 2 sets out the SEA objectives relating to each SEA theme which includes a section on Landscape considerations.

Summary of Stakeholder Engagement

Section 4 'Engagement Statement' of the Evidence Report summarises the various engagement and consultation activities that have been undertaken to inform the Evidence Report. This includes collaborative working with Key Agencies and other stakeholders in the preparation of

Topic Papers and the Play Sufficiency Assessment, and other place-based engagement and workshops.

A series of Topic Papers were prepared structured around the sustainable, liveable and productive places themes of National Planning Framework 4.

Wider external engagement with stakeholders commenced on 12th April and ended on 10th May 2024, inviting people interested in LDP3 to review the Topic Papers that cover their areas of interest and to share their comments. The aim of the engagement was to establish areas of agreement or disagreement and any additional evidence that should be taken into account.

The Topic Papers were published on the Council's Local Development Plan Hub on Commonplace, and through the Council's LDP3 website, Facebook and Twitter account and email notifications were sent to individuals and organisations listed on the LDP contact database.

The SEA Scoping Report was submitted to the SEA Gateway consultation authorities on 19th April for a 6-week consultation period. The Gateway Authorities were generally supportive of the Scoping Report subject to a few points for consideration for the Environmental Report to be prepared alongside the Proposed Plan. Comments are summarised in Section 4 Table 1 of the Evidence Report.

Summary of Implications for the Proposed Plan

The East Renfrewshire Green Belt has been a successful strategic management tool in guiding new development and ensuring that the landscape setting and identity of settlements has been protected. Its integrity has been assessed and tested through successive LDP examinations, with adjustments made when required to meet housing requirements. As LDP2 did not make any additional allocations into the green belt and as there have been no major proposals granted that would impact upon the green belt or landscape character it is viewed that the 2016 Landscape Character Assessment (LCA) remains the most up to date evidence base to inform LDP3 and potential spatial growth options.

The housing topic paper sets out the Housing Land Requirement for the East Renfrewshire area over a 10-year period. The Green Belt continues to be subject to development pressure at the urban fringe. The Landscape Character Assessment (LCA) and other supporting landscape studies, Site Assessment Framework and SEA will be crucial in identifying potential spatial options for the Proposed Plan to meet these housing requirements and will be used, if growth cannot be fully accommodated in the urban area, to identify opportunities on the land most suitable and capable of accommodating development on land out-with the urban area. Assessment will be undertaken alongside the availability of infrastructure and meeting Local Living requirements.

The LCA forms form a critical component of the Site Assessment Framework (SD 001) and will be used to assess proposals submitted as part of the 'call for sites' process that will be undertaken after the evidence report has been through Gate Check stage. This includes landscape and visual sensitivity, coalescence and long-term integrity of the Green Belt.

NPF4 identifies Green Belt areas under Policy 8 and the wider rural area under Policy 17. Through LDP3 we will amend the references used to reflect NPF4 and the policy approach to be taken within each to align with NPF4.

The Local Living Topic Paper highlights that rural areas generally have poorer access to public transport and more limited access to services and facilities. Application of the concept of Local Living is also more challenging in the rural areas and that locating services strategically to serve a group or cluster of settlements needs to be considered through LDP3. The paper notes that provision of additional housing in rural settlements to support the viability of existing services and the delivery of new services also needs to be considered. The sustainability of the rural economy is also important, and the LDP3 should seek to support appropriate development in the Green Belt and rural areas. Further information on each rural settlement is set out in the Rural Settlement Profiles (SD 005).

Statements of Agreement / Dispute

Statements of Agreement

Public - Billy Clark

A single response was received from a member of the public who broadly agrees with the evidence.

NatureScot

NatureScot stated that they were generally happy with the topic paper, which provides details of the current green belt boundaries of East Renfrewshire. The response states that they understand that Green Belt boundaries have been continually updated since 2002, reflecting changes in settlement boundaries and taking into account future housing growth. They noted that the Council have undertaken landscape character assessments, and in 2016, a Green Belt Landscape Character Assessment Review, which provides comprehensive data which will be useful to informing the next LDP.

Scottish Water

Scottish Water acknowledges the strategic summary of the topic paper.

East Renfrewshire Council Response

The Council acknowledges and welcomes the supporting comments received and that the Landscape Character Assessment provides comprehensive data which will be useful to informing the next LDP.

Statements of Dispute

Homes for Scotland, Barratt Homes West Scotland & David Wilson Homes West Scotland (Barratt), ICENI on behalf of the Baird Family, Cala Management Ltd (CALA), Rowallandale Ltd, Taylor Wimpey, ICENI On behalf of East Renfrewshire Home Builder Consortium (Mac Mic Group; Miller Homes; Robertson Homes; Taylor Wimpey), ICENI on behalf of The Mac Mic Group, Miller Homes, Brindley Associates on behalf of The Mac Mic Group, Robertson Residential Group

The responses provide support for the recognition in the topic paper, that not all new development will be located within the urban area, and that green belt land will need to be

utilised for the delivery of housing. They refer to the evidence presented in the Brownfield, Vacant, Derelict and Contaminated Land Topic Paper and the reducing supply of brownfield sites.

There is agreement that the Green Belt is a key planning tool that is instrumental in guiding planned growth to the most appropriate locations however, we disagree that the existing Green Belt boundary remains appropriate and fit for purpose. The responses dispute the approach to consideration of the green belt outlined in the topic paper which in their view does not allow for the local authority to robustly evidence which land is best placed to support the numerous new housing allocations that will be required across East Renfrewshire. They state that the national policy context regarding green belts has changed. The context surrounding their designation has shifted, and current boundaries are to be reviewed as a necessity. They state a pragmatic and strategic approach to Green Belt review and land release, is needed in order to meet housing pressures, whilst protecting parts of the Green Belt that still serve their purpose. Reference is made to the Diffley Report which estimates housing needs for East Renfrewshire.

The responses state that it is imperative that the Council carry out a review of the green belt as part of preparing the emerging LDP3, particularly as NPF4 (Policy 8) states that Green belts will not be necessary for most settlements but may be zoned around settlements where there is a significant danger of unsustainable growth in car based commuting or suburbanisation of the countryside. Green belts should be identified or comprehensively reviewed as part of the preparation of LDPs. Boundary changes may be made to accommodate planned growth or to extend or alter the area covered as green belt. In addition, Rowallandale Ltd stated that the Council must also recognise the need for land for religious groups and be able to plan for the space required to accommodate these types of uses.

The responses dispute the use of coalescence and state that this should be a matter to be weighed against other planning considerations at the detailed site assessment stage. This must be weighed against other defined policy objectives such as Local Living and Infrastructure First. The Scottish Government's recent planning guidance document on "Local Living and 20 Minute Neighbourhoods" (Scottish Government, 2024) should be taken into consideration when identifying suitable and sustainable locations for housing development. This will help support appropriate village expansion in addition to growth around urban settlement edges.

It is agreed that a joined-up approach in deciding Green Belt release should be taken alongside considerations of housing need, local infrastructure requirements and supporting local living requirements.

It is stated that a green belt review is not discretionary but is a clear requirement of NPF4 and the Guidance. It is therefore a significant risk that the Gate Check process may deem the Evidence Report to be deficient on this basis.

It is stated that a new Landscape Character Assessment is required to be completed, given the previous version is now almost a decade old, and it is merely a review of a 2005 assessment.

Rowallandale Ltd stated that it is important, prior to the Gate Check, to reflect any development which has proceeded to in an updated landscape character assessment to reflect the most up to date position on the character and quality of the Green Belt to aid decision making in release of new Green Belt sites to meet community needs to local people.

Brindley Associates stated that The Landscape Character of East Renfrewshire is said to be broadly covered by Glasgow and Clyde Valley Assessment (1999), which is represented accordingly within

NatureScot's Landscape Character Assessment (2019). Key characteristics and issues of the Landscape Character Types (LCTs) located within East Renfrewshire may not all be applicable to the area. It may, therefore, be helpful for the Council to identify which characteristics and issues are applicable to each LCT within the council area, including areas outwith settlements, and key characteristics that the council would like to promote where future development falls within its boundaries.

ICENI on behalf of The Mac Mic Group state that within the paper there is zero reference to renewable energy developments within the Greenbelt. The topic paper must consider the Greenbelt as multifunctional that can assist in addressing the climate emergency and recently declared housing emergency. Subject to design, renewable energy development proposals should be supported within the greenbelt. Additionally, we consider future development would facilitate and enhance a usable green network within ERC. The usable green network aligns with the multifunctional greenbelt incorporating active travel, biodiversity enhancement and sustainable drainage systems.

This topic paper is intrinsically linked with the draft topic papers on Housing, Brownfield, Vacant and Derelict Land, Local Living, Education, Transport, and the Placemaking. Findings and key issues for LDP3 must reflect and address the findings of the related papers.

Settlement specific responses on Clarkston, Waterfoot, Eaglesham, Busby and Newton Mearns are referred to.

East Renfrewshire Council Response

Policy 8: Green Belts of NPF4 states that 'LDPs should consider using green belts, to support their spatial strategy as a settlement management tool to restrict development around towns and cities. Green belts will not be necessary for most settlements but may be zoned around settlements where there is a significant danger of unsustainable growth in car-based commuting or suburbanisation of the countryside. Green belts should be identified or reviewed as part of the preparation of LDPs. Boundary changes may be made to accommodate planned growth, or to extend, or alter the area covered as green belt. Detailed green belt boundaries should be based on evidence and should be clearly identified in plans'.

The Council agrees that Green Belts should be identified or reviewed as part of the preparation of LDPs. The Topic Paper and Topic Paper 13: Housing acknowledge that the Landscape Character Assessment (LCA) and other supporting landscape studies, Site Assessment Framework and SEA will be crucial in identifying potential spatial options for the Proposed Plan to meet the 10-year housing requirements. The topic papers clearly state that further revision to the Green Belt boundaries will be required, once the spatial distribution of sites is known, in accordance with NPF4 and the LDP guidance.

The 2016 LCA factored in land use changes resulting from the identification of masterplan sites promoted through LDP1 and carried forward to LDP2. Settlement boundaries therefore remain unaltered from those shown in LDP2. The Council retains the view that as LDP2 did not make any additional allocations into the Green Belt and as there have been no major proposals granted that would impact upon the Green Belt boundaries or landscape character the 2016 LCA remains relevant and the most up to date evidence base to inform LDP3 and potential spatial growth options. Section 7 of the Topic Paper provides an overview of planning application decisions in the Green Belt. As shown in this section and the Plan Outcomes section of this Evidence Report whilst

there continues to be considerable pressure for development in the Green Belt the current strategy of LDP2 has shown to be effective in resisting such proposals. No major development sites that constitute departures from the Development Plan have been approved by the Council or on appeal out with the urban areas or at the urban fringe. In addition, there have been no major infrastructure projects that would alter the current boundaries.

The review of green belt boundaries is only one factor in the identification of sites for the Proposed Plan. Other key assessments include the SEA, Transport Appraisal, Local Living analysis and Education modelling. Until the Call for Sites stage and other supporting assessments have been concluded it is premature to indicate potential growth options or removal of land from the Green Belt at this Evidence Report stage. As clearly stated in the Topic Paper the spatial distribution of growth and any resultant land to be removed from the Green Belt will be achieved through the Proposed Plan.

The Council acknowledges that coalescence is not specifically mentioned under Policy 8 of NPF4. However, this remains a key consideration when identifying potential growth options and will be considered through the Call for Sites stage. The Council disagrees that such references should be removed from the Topic paper.

Analysis of the Diffley Report is addressed separately under the Councils response to Topic Paper 13: Housing.

The Council acknowledges that the needs of faith groups will be considered through the preparation of development briefs or master plans for LDP3.

Commentary on settlement locational information will be addressed through the Call for Sites and Proposed Plan stage when identifying the spatial distribution of development.

The Council notes the comments on Renewable Energy. As highlighted in the Topic Paper 8: Energy Generation and Distribution LDP3 will need to continue to consider how to realise the full potential of the area for opportunities for renewable, low carbon, and zero emission energy in accordance with NPF4. Renewable energy issues are also addressed under Topic Paper1: Climate Mitigation and Adaptation. NPF4 identifies Green Belt areas under Policy 8 and the wider rural area under Policy 17. Through LDP3 we will amend the references used to reflect NPF4 and the policy approach to be taken within each to align with NPF4. This matter will be address further through the Proposed Plan stage.

Gate Check

The Council is of the view that agreement has not been reached on all areas of dispute. This topic may require to be considered further by the Reporter.

<p>East Renfrewshire LDP3 Issue Topic Paper 007 - Brownfield, Vacant, Derelict and Contaminated Land</p>	<p>NPF4 – Sustainable Places Policy 9: Brownfield, vacant and derelict land and empty buildings Policy 23: Health and safety</p>
<p>Information required by the Act regarding the issue addressed in this section</p>	<p><u>2019 Planning (Scotland) Act</u></p> <p>Section 15(5):</p> <ul style="list-style-type: none"> • the principal physical and environmental characteristics of the district <p>Regulation 9 to have regard to:</p> <ul style="list-style-type: none"> • the location of Control of Major Accident Hazard establishments and / or pipelines.
<p>Links to Evidence</p>	<ul style="list-style-type: none"> • National Planning Framework 4 (NPF4) 2023 (CD 102) • East Renfrewshire adopted Local Development Plan 2 (LDP2) (2022) (CD 206) • East Renfrewshire Economic Development Delivery Plan 2023-2025 (CD 230) • East Renfrewshire Economic Baseline Report (Feb 2024) (CD 232) • Glasgow City Region Vacant Industrial and Commercial Land and Property Study 2024- Vacant and Derelict Land Assessment (in progress) (CD 184). • Transforming Vacant and Derelict Land - Housing & Development - Our work - Scottish Land Commission (CD 128) • Buildings at Risk Register for Scotland (CD 005) • Buildings at Risk Register Busby Lower Mill (CD 006) • Site Assessment Framework (SD 001) • East Renfrewshire Housing Land Monitoring Report 2023 (SD 004)
<p>Summary of Evidence</p>	
<p>The purpose of this topic paper is to provide background information about Vacant and Derelict Land (VDL) in relation to the development of East Renfrewshire. This topic paper provides the location of vacant and derelict sites, data on the make-up of VDL, identifies trends in the re-use of VDL and places this information within the framework of policies and guidance regarding</p>	

brownfield sites. An overview of contaminated land and major accident Hazard establishments and / or pipelines is also shown.

Section 1 outlines the Policy Context as provided by NPF4 and the adopted LDP2. NPF4 states a renewed focus on reusing vacant and derelict land to limit build on greenfield. Reference is also made to the Council's Economic Development Delivery Plan, Economic Baseline Report and the regionally VDL assessment.

Section 2 provides data on vacant and derelict land in East Renfrewshire. There are 33 sites on the Council's Vacant and Derelict Land Register covering 43HA. The area and number of vacant and derelict sites in East Renfrewshire has been gradually reducing over the past ten years. In East Renfrewshire 19 % of homes are within 400m of a derelict site, the homes affected are concentrated in Barrhead, Thornliebank and Busby.

Section 3 provides overview of contaminated land. There are no formally identified contaminated land sites in East Renfrewshire. There are pockets of radon gas across the Council area.

Section 4 provides an overview of Major Accident Hazard establishments and / or pipelines. There are no premises which meet the HSE threshold for the Major Control of Accident Hazard Regulations. There is a network of major Transco gas pipelines which traverse the southern half of the authority area.

Section 5 sets out the implications for LDP3, which have been informed by the analysis and outputs in the report.

The LDP3 Evidence Report SEA Scoping Report (April 2024) defines the scope/level of detail to be covered in the Environmental Report for the Proposed Plan. Section 4 provides an overview of the environmental characteristics of East Renfrewshire. Table 2 sets out the SEA objectives relating to each SEA theme with brownfield, vacant, derelict and contaminated land addressed under the 'Landscape', 'Human Health, Air and Hazards', and 'Soil and Geology' themes.

Summary of Stakeholder Engagement

Section 4 'Engagement Statement' of the Evidence Report summarises the various engagement and consultation activities that have been undertaken to inform the Evidence Report. This includes collaborative working with Key Agencies and other stakeholders in the preparation of Topic Papers and the Play Sufficiency Assessment, and other place-based engagement and workshops.

A series of Topic Papers were prepared structured around the sustainable, liveable and productive places themes of National Planning Framework 4.

Wider external engagement with stakeholders commenced on 12th April and ended on 10th May 2024, inviting people interested in LDP3 to review the Topic Papers that cover their areas of interest and to share their comments. The aim of the engagement was to establish areas of agreement or disagreement and any additional evidence that should be taken into account.

The Topic Papers were published on the Council's Local Development Plan Hub on Commonplace, and through the Council's LDP3 website, Facebook and Twitter account and email notifications were sent to individuals and organisations listed on the LDP contact database.

The SEA Scoping Report was submitted to the SEA Gateway consultation authorities on 19th April for a 6-week consultation period. The Gateway Authorities were generally supportive of the Scoping Report subject to a few points for consideration for the Environmental Report to be prepared alongside the Proposed Plan. Comments are summarised in Section 4 Table 1 of the Evidence Report.

Summary of Implications for the Proposed Plan

There is a positive trend that the area of VDL is declining with a good probability that some of the seven sites (6 vacant, 1 derelict) with planning consent or in the process of getting planning consent will be developed before adoption of LDP3. If these developments are realised the number of vacant sites will drop to six and three of these six are currently be marketed as development ready platforms in Crossmill Business Park. Redevelopment of brownfield land should also remain a priority through the Site Assessment Framework (SD 001).

The development of flats on the derelict site in Newton Mearns will remove one derelict site, however the remaining derelict land is a challenge for LDP3. The NPF4 emphasis on Local Living also increases the pressure to achieve housing on derelict land allocated for housing. The derelict sites which remain on the register are those sites with the greatest obstacles for development. It is becoming apparent that allocating a site for housing is not in itself a sufficient catalyst for development. Three derelict sites are designated in LDP2 for housing and are major contributors to the housing Land supply in LDP2. These are Shanks (notional capacity of 400 units) Robslee (notional capacity of 126 units) and Chapellfield (notional capacity of 120 units). LDP2 recognises the challenges of developing these sites and this is reflected in the longer timeframes for development.

The Council will continue to explore the effectiveness of all housing sites currently included within the 2023 Housing Land Audit (SD 004). This includes exploring alternative approaches to unlock sites that have been designated in several plans, including the use of compulsory purchase powers or the potential use of masterplan consent areas (MCAs). This will be informed by a Call for Sites and Ideas exercise. We will prepare a housing pipeline setting out programming of sites over the short-, medium- and longer-term periods to meet the 10-year indicative Housing Land Requirement. Only sites that are deliverable will be identified in LDP3. Sites will not automatically be rolled forward from LDP2.

The application of MCAs could front-load consideration of design, infrastructure and environmental matters at an earlier stage in the planning process. This would allow the Council to take a leadership role rather than waiting for application to be submitted. An MCA could incentivise the developer by providing a streamlined consent process.

Shanks presents the largest challenge given its size, previous use and fragmented ownership. An application for planning permission in principle for housing was submitted in 2017 but the applicant has not been able to take forward plans to construction. LDP3 will consider how obstacles can be overcome and the preferred end use whether that be mixed, residential or economic. A partnership approach is one option, offering the potential to realise the additional funding and resources that will be necessary to make Shanks a viable proposition.

Robslee is another large derelict site in a prime location on the edge of Giffnock. The site has been included in the Housing Land Supply total since 2012. It is known that there is developer interest

in the site, but no proposals have been forthcoming with flooding and potential contamination constraints to be addressed.

The Hurlet site is the largest (1.8ha) derelict site owned by the Council and is allocated in the current LDP2 as greenbelt land. The site is located beyond the current urban edge of Barrhead on the shared boundary with Glasgow City Council and Renfrewshire which might explain why it has attracted less attention than the more central sites. LDP3 could be more pro-active in envisaging a future for a valuable Council asset.

Derelict land at Glen Street in Barrhead Town Centre is in a key location and capable of meeting multiple NPF4 objectives around Local Living neighbourhoods, town centre vitality and sustainability.

The Chapellfield site is programmed in the 2023 HLA post 2030. The southern area of the site has substantially naturalised as woodland and there could be justification for removing it from the VDL completely using the naturalisation criteria. The site is also identified in the current Strategic Housing Investment Plan (SHIP) (2023-2028) for social rented housing together with market homes.

The Water Works derelict site has been reduced in size by a community growing project which has transformed derelict sewages tanks into usable community space. This is a productive use of land which lies on the flood plain and cannot be developed. LDP3 should continue to support the community use of the site and designate the site as part of a green network.

The priority sites for LDP3 to consider:

- Shanks
- Glen Street
- Robslee
- Hurlet
- Chapellfield

LDP3 should take cognisance of potential land contamination and possible risks from radon gas when identifying areas for development. While both issues can be remediated during construction, the early identification of potential hazards can help inform later design phases. There are no premises which present a major accident hazard.

Statements of Agreement / Dispute

Statements of Agreement

Public - Billy Clark

Agree broadly with the evidence.

Scottish Water

Strongly encourage approaches to bring vacant and derelict land to uses that support the management of increasing flood risk from climate change. Using VDL to establish nature-based solutions and blue-green infrastructure networks, as an alternative to traditional development, is something Scottish Water will work with partner agencies to explore.

Developers must consider Scottish Water's Surface Water Policy when designing for Brownfield sites and appropriate above ground sustainable surface water drainage must be incorporated into early design of new developments as connection to combined networks is not promoted.

Nature Scot

Agree broadly with the evidence

Dundas Estates and Development Company Ltd

Agree broadly with the evidence

The Leith Group Representing EPC-UK Ltd

Do not disagree with the evidence but request that the Council collaborate with EPC-UK because of the sensitive operations undertaken at their sites so that specialist advice can be given on the operation and protection of hazard sites in relation to local communities.

East Renfrewshire Council Response

The Council acknowledges and welcomes Scottish Water's positive promotion of VDL being used to create new blue/green infrastructure.

The Leith Group's comment regarding sensitive operations and the request for collaboration over potential hazards site is noted and discussed in more detail in Topic Paper 25 Minerals and Quarrying.

Statements of Dipute

Miller Homes, Icenl On behalf of East Renfrewshire Home Builder Consortium (Mac Mic Group; Miller Homes, Robertson Homes; Taylor Wimpey), Icenl on behalf of the The Mac Mic Group, Homes for Scotland (HFS), Cala Management Ltd, Taylor Wimpey

Consider there are significant gaps in the evidence.

Support for the sustainable reuse of brownfield land including vacant and derelict land and empty buildings, where this land is available and where it can reasonably and viably be developed. Allocating brownfield/derelict sites for housing is not in itself a sufficient catalyst for development. This matter must be considered when determining which sites contribute towards meeting the indicative Local Housing Land Requirement.

The brownfield sites designated for housing in LDP2 must be re-assessed and must not be rolled forward from LDP2. The draft Topic Paper states (in reference to vacant and derelict sites) that allocating a site for housing is not in itself a sufficient catalyst for development. Viability requires to be more fully understood here. Miller Homes, and HFS are willing to share knowledge of constraints associated with the housing sites which have not been brought forward for development. It is important for the Topic Paper to recognise the need for evidence to be kept up to date and any plan and decisions must be able to be made in this context.

The area and number of vacant and derelict sites in East Renfrewshire has been gradually reducing over the past ten years. The topic paper identifies the area of VDL reduction therefore, this reduction combined with forecasted population growth and the need to allocate sufficient land to exceed the Minimum All-Tenure Housing Land Requirement (MATHLR).

The topic paper must align with the Greenbelt topic paper; Housing topic paper and the HfS Rettie / Diffley Existing Housing Need Report. To meet housing needs allocating sites on green belt in sustainable locations will provide houses with faster delivery timescales than on VADL.

Green belt sites will be required where there is proven deliverability and marketability and reduced constraints like contamination. Green belt sites often have lower biodiversity levels and housing development can offer biodiversity enhancement opportunities. Allocating sites on green belt in sustainable locations will provide much needed houses whilst contributing to a settlement infrastructure.

With biodiversity enhancements an NPF4 requirement, brown field sites are less capable of promoting biodiversity in comparison with greenbelt sites due to site constraints, naturalisation and viability. The spatial strategy must take into account the deliverability and viability of brownfield site development.

Miller Homes note that the Council has indicated that there is no formally identified contaminated land in East Renfrewshire.

Dundas Estates and Development Company Ltd

We don't agree entirely that the Council has been proactive in promoting vacant and derelict sites. Whilst Policy E10 of LDP2 is clearly supportive, the reality in many parts of the Council area is that housing development on vacant sites is severely constrained due to capacity issues with associated infrastructure e.g. schools. This has served to block several development proposals for the re-use of vacant and derelict sites.

The derelict land maps shown on figures 1 – 3 are drawn at a large scale, and it is not clear that the vacant site at the former Mearnskirk Care Home on Mearnskirk Road, Newton Mearns is included. If not included it should be added to the Council's Vacant and Derelict Land annual survey returns.

Historic Environment Scotland (HES)

HES consider there is a gap in the evidence because it does not contain specific information about vacant and derelict buildings that are on the Buildings at Risk Register (BARR).

We note that reference is made to Buildings at Risk within Topic Paper 7 and that consideration is given to this evidence in the Historic Assets and Place Topic Paper. However, we would note that while the entries on the Buildings at Risk Register are focused on heritage assets it is also an evidence source for data on empty buildings. It would therefore be beneficial for this evidence source to be more fully covered in this topic paper.

East Renfrewshire Council Response

In response to comments on the viability of VADL sites, all housing sites allocated in LDP2 will be re-assessed before inclusion in LDP3. Section 7 of Topic Paper 13 Housing states that the Council

will explore the effectiveness and deliverability of all housing sites currently included within the 2023 Housing Land Audit. The Site assessment framework reaffirms the LDP guidance requirement that no site will automatically roll forward from the current adopted LDP2.

Analysis of the Diffley Report is addressed separately under the Councils response to Topic Paper 13: Housing.

Comments that VADL land is insufficient to meet housing need, and this will require release of greenbelt land are noted. The revision of Green Belt boundaries is covered in Topic Paper 6 Green Belt and Landscape Character and Topic Paper 13 Housing. The Landscape Character Assessment (LCA), Site Assessment Framework and SEA will be crucial in identifying spatial options for the Proposed Plan that meet the 10-year housing requirements.

The suggestion that HFS and HFS members are willing to share knowledge of constraints associated with housing sites that have not been brought forward for development is welcomed.

Historic Environment Scotland's suggestion of referencing the Buildings at Risk Register (BARR) is noted. Section 2 of the Topic Paper has been amended to include Busby Mill, which is on both the BARR and VADL registers, this evidence improves cross referencing to Topic Paper 5 Historic Assets.

The deliverability of biodiversity enhancements on brownfield land would be considered on a site-by-site basis. The Council agrees with the comment regarding the low biodiversity value of agricultural greenfield land compared to brownfield and agrees with the comment that new development can enhance biodiversity where existing levels are low.

Site specific comments will be considered at the Proposed Plan Stage.

Scottish Water's comments on the re-use of vacant and derelict land in ways which create new blue infrastructure to manage flood risk are noted.

The suggestion that a site at the former Mearnskirk Nursing home is included on the VDL register and added to the figures in topic paper is noted, this site will be surveyed as part of the 2024 annual review of VADL. The evidence regarding Infrastructure constraints, in particular education, are covered in Topic Paper 14 Infrastructure First.

Gate Check

The Council is of the view that there are no areas of dispute to be considered at Gate Check for this topic.

<p>East Renfrewshire LDP3 Issue Topic Paper 008 - Energy Generation and Distribution</p>	<p>NPF4 – Sustainable Places Policy 11: Energy</p>
<p>Information required by the Act regarding the issue addressed in this section</p>	<p><u>2019 Planning (Scotland) Act</u></p> <p>Section 15(5):</p> <ul style="list-style-type: none"> • the infrastructure of the district; and • how that infrastructure is used. <p>Regulation 9 - have regard to:</p> <ul style="list-style-type: none"> • the national marine plan; and • any regional marine plan.
<p>Links to Evidence</p>	<ul style="list-style-type: none"> • Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 (CD 011) • National Planning Framework 4 (NPF4) 2023 (CD 102) • Heat Networks Act 2021 (CD 026) • Draft Scottish Energy Strategy and Just Transition Plan 2023 (CD 013) • Onshore wind policy statement 2022 (CD 103) • UK Hydrogen strategy (CD 163) • Hydrogen Policy Statement 2020 (CD 109) • Hydrogen action plan 2022 (CD 108) • East Renfrewshire Get to Zero Action Plan (GTZAP) (CD 240) • East Renfrewshire Local Heat and Energy Efficiency Strategy (LHEES) (2024) (CD 253) • East Renfrewshire adopted Local Development Plan 2 (March 2022) (CD 206) • East Renfrewshire Wind Energy Spatial Framework Map (CD 297) • East Renfrewshire Renewable Energy Supplementary Guidance (2017) (CD 264) • East Renfrewshire Wind Energy Study (2012) (CD 274) • RenewableUK Wind Energy Database (CD 074) • Electric vehicle charging devices by local authority (CD 017) • Scottish Power Energy Network Development Plan (2022) (CD 130) • SPEN Open Data Portal (CD 131)

Summary of Evidence

The purpose of this Topic Paper is to provide background information on the subject of energy generation and distribution. This Topic Paper looks at the issues which influence the energy sector and also discusses current policies and guidance relating to energy that will form the framework for the development of the LDP.

The planning system is fundamental in the transition to a zero-carbon place and economy and minimising the carbon emissions of development, in delivering new renewable energy systems, and of designing zero carbon places which support healthy and sustainable transport options. It will make a significant contribution to meeting the Scottish Governments overall aim of reducing Scotland's emissions of all greenhouse gases to net-zero by 2045.

Section 1 provides an overview of the context for energy generation and distribution and the key challenges. East Renfrewshire Council has joined many local authorities in Scotland in declaring a climate emergency in October 2021. Energy use is changing because of the decarbonisation of energy networks and due to climate change.

The main existing sources of renewable energy across East Renfrewshire include onshore wind turbines, concentrated to the south of the Council area. The electricity grid serving the East Renfrewshire area has seen a significant growth in renewable and low carbon energy generation as part of the strategic approaches set out in previous LDPs. Substantial additional renewable generation will be required to support the transition to net zero. The Council has published a Local Heat and Energy Efficiency Strategy (LHEES) (CD01), as a long-term plan to decarbonise heat and improve energy efficiency.

The transition to net zero carbon is also placing new pressures on electricity infrastructure, with the electrification of heat and transport all leading to a need for reinforcement and additional capacity on the grid.

Section 2 outlines the Policy Context including NPF4 and the Heat Networks Act.

Section 3 provides an overview of national and local strategies, including at a national level the Draft Scottish Energy Strategy and Just Transition Plan, Onshore wind: policy statement, Hydrogen Policy Statement and at a local level the East Renfrewshire Get to Zero Action Plan and the Council's LHEES.

Section 4 provides an overview of opportunities for renewable, low carbon and zero emission energy within East Renfrewshire. The Paper states that the Council will seek to ensure that the area's potential to accommodate renewable energy technologies is realised and optimised, giving careful consideration to relevant environmental, community and cumulative impacts of proposals. Whilst wind energy is likely to make the most substantial contribution to renewable energy targets, the drive towards a low carbon future cannot be secured by wind energy alone and it is recognised that a diverse mix of renewable energy sources is required.

LDP3 should continue to explore opportunities for the development of electricity generation from a range of renewable energy technologies such as solar, geothermal, biomass, anaerobic digestion, district heating or hydroelectric if targets are to be met. An element that must be taken into account when considering new renewable energy installations is the ability to connect into the electrical grid.

An overview of potential sources of renewable energy is provided.

Section 5 provides an overview of the Existing Grid Capacity within East Renfrewshire. The Council liaised with Scottish Power Energy Networks (SPEN) in preparing the Topic Paper. Discussions with SPEN identified that the loadings in East Renfrewshire were quite healthy and at this point there isn't a significant need for reinforcement. However, ongoing dialogue with SPEN will help to ensure that the programmed delivery of sites aligns with the investment plans of SPEN, ensuring sites are feasible for delivery.

Section 6 sets out the implications for LDP3, which have been informed by the analysis and outputs in the report.

The LDP3 Evidence Report SEA Scoping Report (April 2024) defines the scope/level of detail to be covered in the Environmental Report for the Proposed Plan. Section 4 provides an overview of the environmental characteristics of East Renfrewshire. Table 2 sets out the SEA objectives relating to each SEA theme which includes a section on energy considerations within the 'Climatic Factors' and 'Population and Place' themes.

Other matters:

There are no national or regional marine plans applicable to East Renfrewshire.

Summary of Stakeholder Engagement

Section 4 'Engagement Statement' of the Evidence Report summarises the various engagement and consultation activities that have been undertaken to inform the Evidence Report. This includes collaborative working with Key Agencies and other stakeholders in the preparation of Topic Papers and the Play Sufficiency Assessment, and other place-based engagement and workshops.

A series of Topic Papers were prepared structured around the sustainable, liveable and productive places themes of National Planning Framework 4.

Wider external engagement with stakeholders commenced on 12th April and ended on 10th May 2024, inviting people interested in LDP3 to review the Topic Papers that cover their areas of interest and to share their comments. The aim of the engagement was to establish areas of agreement or disagreement and any additional evidence that should be taken into account.

The Topic Papers were published on the Council's Local Development Plan Hub on Commonplace, and through the Council's LDP3 website, Facebook and Twitter account and email notifications were sent to individuals and organisations listed on the LDP contact database.

The SEA Scoping Report was submitted to the SEA Gateway consultation authorities on 19th April for a 6-week consultation period. The Gateway Authorities were generally supportive of the Scoping Report subject to a few points for consideration for the Environmental Report to be prepared alongside the Proposed Plan. Comments are summarised in Section 4 Table 1 of the Evidence Report.

Summary of Implications for the Proposed Plan

Although the current LDP2 provides a strong framework in developing place-based solutions to a zero-carbon future and contains strong policies on climate change adaptation and mitigation, it will be critical to build upon this in the preparation of LDP3. The LDP spatial strategy should be designed to reduce, minimise or avoid greenhouse gas emissions. The Climate Emergency declared by East Renfrewshire Council and the Get to Zero Action Plan requires the Council to take urgent action to address the risks of climate, change to meet key targets for reduction in carbon emissions.

National policy, including the National Planning Framework (NPF4) is supportive of renewable and low carbon energy development, in order to support a Just Transition to the low carbon economy.

The Plan will need to assess, describe and plan for the transition to a zero-carbon energy system that will be needed across the entire Council area and to ensure that new developments are planned in such a way as to fit within the decarbonisation strategy for the area. This is critical if the Council are to do full justice to achieving a zero-carbon place. Policies in LDP3 will be required to be adaptable to infrastructure demands, and the roll out of new technologies as they emerge.

There are a number of energy generating developments across the Council area, including wind energy developments. LDP3 will need to continue to consider how to realise the full potential of the area for opportunities for renewable, low carbon, and zero emission energy. The Plan will need to provide a positive policy framework for the development of renewable energy projects and energy storage including associated infrastructure and potential upgrades to grid capacity. LDP3 will continue to be explore opportunities for the development of heat networks as well as emerging technologies such as hydrogen, particularly as fuel poverty and requirement for heat networks continue to influence energy policy. Hydrogen continues to be an emerging technology, with delivery challenges around distribution within the gas network and viability.

Further studies may be commissioned to determine Areas of Greatest Potential for alternative energy sources, with a focus on locational/environmental considerations such as scale, visual impact, landscape features, carbon rich soils etc. Solar farms and battery storage are two examples of potentially viable renewable technologies that could be capable of delivering renewable energy at a commercial scale. There will be a need to amend LDP3 to align with NPF4 and review the current Spatial Framework to include Class 1 areas of peatland as highlighted in the Soils Topic Paper.

East Renfrewshire's just transition towards decarbonising heat will require the changing use of existing energy infrastructure. This will be influenced by where grid improvements and additional generation are required. The Council will work collaboratively with the SPEN to undertake energy infrastructure modelling that reflects agreed programming for mixed use and residential site allocations identified through the Proposed Plan stage to ensure comprehensive grid capacity solutions are implemented.

Following publication of the final LHEES a Local Area Energy Plan will be progressed alongside the development of Local Development Plan 3.

Energy planning will form a consideration of the site assessment framework (SD 001) by taking account of considering the proximity of and potential for heat network zone designation in designating proposed development sites.

Statements of Agreement / Dispute

Statements of Agreement

Public - Billy Clark

Agree broadly with the evidence

NatureScot

NatureScot stated that they were content with this paper. They stated that they didn't notice anything that they would dispute, or that they consider to be missing.

Scottish Water

Recognise that water plays a key role in renewable energy development. Scottish Water is actively engaged in the growth of hydrogen as a key energy source and continue to support Scotland's ambitions in this sector. Hydrogen production can have significant impact on water resources due to volume of water required. Scottish Water support the opportunities to use alternative sources of water for hydrogen processes where drawing potable water from the public network may prove challenging, for example, re-use and treatment of effluent and desalination. Scottish Water strongly recommends early engagement through the Pre-Development Enquiry (PDE) process to further interrogate network and capacity demand required to facilitate any new energy developments.

Homes for Scotland, ICENI On behalf of East Renfrewshire Home Builder Consortium (Mac Mic Group; Miller Homes; Robertson Homes; Taylor Wimpey), ICENI on behalf of The Mac Mic Group, Miller Homes

Agree broadly with the evidence. The Building (Scotland) Amendment Regulations 2023 (New Heat Standard) has changed the way that new homes will be heated and the associated carbon emissions. Section 72 of the Climate Change (Scotland) Act 2009 introduced Section 3F into the Town and Country Planning (Scotland) Act 1997. Section 3F requires local development plans to contain policies that require new buildings to be designed to avoid a specified and rising proportion of greenhouse gas emissions from their use through the installation and operation of low and zero-carbon generating technologies.

As of 1 April 2024, the above regulations combined with national planning policy and heat policy go much further than what section 3F can achieve. The requirement to include policies within development plans under Section 3F is therefore no longer necessary and as detailed within the Climate Change Act – Section 72: fourteenth annual report work is commencing to prepare a repeal Order for consideration by the Scottish Parliament.

Agree – Potential future schemes appear to be predominantly for solar photovoltaics and battery storage proposals. However, there is an emerging need to ensure that energy supply is resilient. Support should be given to diversification of the energy market.

Agree – potential to develop technology in urban areas using existing VDL or underused land. Large scale Solar development would enable a diverse supply of renewable energy moving from an over reliance on wind energy. The greenbelt would be capable of accommodating renewable energy development.

The Topic Paper highlights concerns regarding fuel poverty. It requires to be understood that HFS members already routinely provide energy efficiency measures in their developments. On average, 89% of all new homes built by HFS members meet at least an EPC grade 'B' standard. In terms of carbon reduction, surveys show that, increasingly, home builders are embedding zero emissions heating systems and enhanced energy-efficiency measures into their developments.

HFS members are fully committed to reducing the impacts of climate change and already consider sustainability as an integral part of their businesses. The move away from gas central heating to heat pumps combined with the provision of electric vehicle charging points will substantially increase the energy demand for new homes. It is key that grid capacity is provided timeously to serve proposed development on allocated sites to ensure that new homes are not delayed.

It is vital to highlight the need for the spatial strategy in the next LDP to consider both sustainable and marketable locations for new developments. Similarly, the availability of grid capacity should not dictate where development is located. It is essential that the Council works with SPEN to ensure that an upgrade to the network is aligned with the future housing supply pipeline.

The focus in the proposed Local Area Energy Plan should be to ensure that there is sufficient grid capacity to support new developments within LDP3.

ERC has identified areas that have the possibility of installing district heating systems through the LHEES.

ERC has the lowest EV Charging facilities in Scotland. New development can help deliver increased EV Charging to the area contributing to a sustainable place.

New development and new District Heating Systems, where viable, can strengthen the grid to support heat decarbonisation. This will improve the heating of new and existing homes in ERC delivered by utilising Air Source Heat Pumps. Additionally, housebuilding allows for increased supply of fit-for purpose and energy efficient homes.

This paper, alongside the Greenbelt topic paper should promote renewable energy development within.

East Renfrewshire Council Response

The Council acknowledges and welcomes the supporting comment received. It is positive that HFS and their members are fully committed to working with the Council to reduce the impacts of climate change through future proposals.

The requirement for collaborative working with Scottish Water is noted.

The sustainability and marketability of proposals will be considered through the Site Assessment Framework.

The Topic Paper clearly acknowledges that the Council will continue to work in collaboration working with SPEN to undertake energy infrastructure modelling and to ensure grid capacity solutions are implemented once the spatial distribution of growth is known. The impact of proposals upon grid capacity is a core component of the Site Assessment Framework.

Addressing fuel poverty issues is noted.

The Council notes the comments on Renewable Energy. As highlighted in the Topic Paper LDP3 will need to continue to consider how to realise the full potential of the area for opportunities for renewable, low carbon, and zero emission energy in accordance with NPF4. Renewable energy issues are further addressed under Topic Paper1: Climate Mitigation and Adaptation. NPF4 identifies Green Belt areas under Policy 8 and the wider rural area under Policy 17. Through LDP3 we will amend the references used to reflect NPF4 and the policy approach to be taken within each to align with NPF4. This matter will be address further through the Proposed Plan stage.

Statements of Dispute

Homes for Scotland

The heating and cooling of our homes is dependent on and not limited to location, altitude, orientation, principal design, and fabric heat loss. Most East Renfrewshire homes currently fall outwith any potential Heat Network Zones (HNZ). There is however potential for standalone heat networks provided by an independent distribution network operator to be viable for larger new housing developments. This could involve a centralised energy centre comprising of air source heat pumps or network of ground source heat pumps. Homes post 2023 building standards will have a lower heat demand than pre-2023 building standards and require a higher unit trigger number for a commercially viable heat network. HNZ are therefore unviable in East Renfrewshire unless they are part of a new strategic housing allocation.

HNZs are supported in principle, however where there are multiple landowners and interests' development is likely to be delayed due to the requirement to form an Energy Services Company (ESCo). Additionally, it is not clear how infrastructure belonging to an ESCo within the potentially adopted road network would be considered by a roads authority.

It is unreasonable to require a development to be designed and constructed to connect to a potential future heat network at a later date. The extent of any safeguard within the adopted road network, private garden ground and homes would be unknown whilst the cost associated with retrofitting a solution is likely to be prohibitive. There is also no guarantee that homeowners will be willing to convert from an existing energy provider to an ESCo.

East Renfrewshire Council Response

The LDP will take into account the requirements of Policy 19: Heat and Cooling of NPF4 which require the spatial strategy to take into account areas of heat network potential and any designated Heat Network Zones (HNZ). Criteria 16a states that proposals within or adjacent to a Heat Network Zone identified in the LDP will only be supported where they are designed and constructed to connect to the existing heat network. This matter is addressed further under Topic Paper 016: Heating and Cooling.

Gate Check

The Council is of the view that there are no areas of dispute to be considered at Gate Check for this topic.

<p>East Renfrewshire LDP3 Issue Topic Paper 009: Zero Waste</p>	<p>NPF4 – Sustainable Places Policy 12: Zero Waste</p>
<p>Information required by the Act regarding the issue addressed in this section</p>	<p><u>2019 Planning (Scotland) Act</u></p> <p>Section 15(5):</p> <ul style="list-style-type: none"> • The infrastructure of the district; and • how that infrastructure is used. <p>Regulation 9 - have regard to:</p> <ul style="list-style-type: none"> • the national waste management plan.
<p>Links to Evidence</p>	<ul style="list-style-type: none"> • National Planning Framework 4 (NPF4) 2023 (CD 102) • EU Waste Framework Directive (Directive 2008/98/EC) (CD 021) • Making Things Last: a circular economy strategy for Scotland (2016) (CD 112) • Zero Waste Plan (2010) (CD 124) • Stop, Sort, Burn, Bury? (CD 105) • East Renfrewshire Adopted Local Development Plan 2 (LDP2) (CD 206) • East Renfrewshire Fleet Asset Management Plan (RAMP) (CD 266) • Clyde Valley residual waste contract (CD 173) • SEPA – Scottish Household Waste 2022 (CD 142) • Improvement Service Benchmarking – proportion of waste that is recycled (CD 086) • UKGBC (CD 165) • SEPA waste sites and capacity data tool (CD 151) • East Renfrewshire Waste Management Facilities map (CD 293) • SEPA waste site information (CD 150)
<p>Summary of Evidence</p>	
<p>The purpose of this Topic Paper is to provide an overview on the subject of zero waste. This Topic Paper assesses the key drivers for change that will minimise waste and adapt, encourage, promote and facilitate development that is consistent with the waste hierarchy. It also provides a summary of the current waste evidence base and explains how it will be used to shape LDP3.</p> <p>Section 1 sets out the policy context and an evaluation of the main policy drivers as provided by NPF4 and the waste framework directive. NPF4 supports the development of waste management facilities which support the circular economy. This prioritises the reduction and reuse of materials in construction.</p>	

Section 2 provides an overview of national, regional and local strategies that inform LDP3 as provided in the evidence section above. This includes Making Things Last: a circular economy strategy for Scotland (2016), Zero Waste Plan (2010), Stop, Sort, Burn, Bury?, East Renfrewshire Adopted Local Development Plan 2 (LDP2) and East Renfrewshire Fleet Asset Management Plan (RAMP).

Section 3 provides an overview of waste, setting out the context for East Renfrewshire. The benefits of a circular economy are set out. There are two waste management facilities in East Renfrewshire: Carlibar Road, Barrhead and Greenhags, Newton Mearns. There has been a reduction in greenhouse gas emissions with waste being diverted from landfill to energy recovery. A 49% reduction has been estimated, as a result of the Clyde Valley residual waste contract.

In East Renfrewshire, 41,421 tonnes of household waste was generated in 2022 with 23,193 tonnes recycled. 3,261 tonnes of waste was landfilled or 7.9%. In 2022/23 56% of household waste was recycled.

The Council approved a new Fleet Purchasing Policy in September 2023 to transition from diesel to zero-emission vehicles from 2027-2030.

Section 4 sets out the implications for LDP3, which have been informed by the analysis and outputs in the report.

The LDP3 Evidence Report SEA Scoping Report (April 2024) defines the scope/level of detail to be covered in the Environmental Report for the Proposed Plan. Section 4 provides an overview of the environmental characteristics of East Renfrewshire. Table 2 sets out the SEA objectives relating to each SEA theme which includes a section on waste considerations.

Summary of Stakeholder Engagement

Section 4 'Engagement Statement' of the Evidence Report summarises the various engagement and consultation activities that have been undertaken to inform the Evidence Report. This includes collaborative working with Key Agencies and other stakeholders in the preparation of Topic Papers and the Play Sufficiency Assessment, and other place-based engagement and workshops.

A series of Topic Papers were prepared structured around the sustainable, liveable and productive places themes of National Planning Framework 4.

Wider external engagement with stakeholders commenced on 12th April and ended on 10th May 2024, inviting people interested in LDP3 to review the Topic Papers that cover their areas of interest and to share their comments. The aim of the engagement was to establish areas of agreement or disagreement and any additional evidence that should be taken into account.

The Topic Papers were published on the Council's Local Development Plan Hub on Commonplace, and through the Council's LDP3 website, Facebook and Twitter account and email notifications were sent to individuals and organisations listed on the LDP contact database.

The SEA Scoping Report was submitted to the SEA Gateway consultation authorities on 19th April for a 6-week consultation period. The Gateway Authorities were generally supportive of the Scoping Report subject to a few points for consideration for the Environmental Report to be

prepared alongside the Proposed Plan. Comments are summarised in Section 4 Table 1 of the Evidence Report.

Summary of Implications for the Proposed Plan

LDP3 should

- Continue to work in partnership with national and regional agencies, including our neighbouring councils within the Glasgow City Region, will be necessary to achieve our Get to Zero and Zero Waste ambitions. The partnerships we have formed and will help the Council and its staff by learning from others, sharing examples of where we are making progress and in the delivery of actions that require a regional approach.
- Promote a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible and meet identified needs in a way that moves waste as high up the waste hierarchy as possible.
- Explore opportunities for enhanced waste depot facilities to operate from whilst recognising there will be a major infrastructure challenge to accommodate an EV (Electrical Vehicle) Fleet, both in terms of space and charging infrastructure.
- Support the development of new waste management facilities and infrastructure facilities for the management of all types of waste.
- Safeguard the existing waste management facilities
- Encourage waste minimisation and waste prevention through the reuse of materials and using fewer resources in the production and distribution of products;
- Design developments with adequate, flexible and easily accessible storage space and collection systems
- Move waste management away from landfill and towards sustainable waste management.
- Incorporation of waste minimisation principles within local development plan policies to minimise waste generation during construction and provide adequate space/provision for waste and recycling facilities within new developments.
- Ensure that new development proposals are enabled to connect to any adjacent existing or new heat networks, Energy from Waste facilities, or other heat providers.

Statements of Agreement / Dispute

Statements of Agreement

Scottish Water

Endorses opportunities to incorporate circular economy principles when considering any future development and expansion of local communities. This would include the utilisation of existing assets prior to new build, recycling of materials as well as looking to extract value from waste streams such as grey water recycling, surface water management, nutrients from wastewater streams and integrated energy from multiple waste streams.

ICENI on behalf of the Baird Family

Agree broadly with the evidence. The response states that where it is suggested that LDP3 should ensure that new development proposals are enabled to connect to any adjacent existing or new heat networks, energy from waste facilities, or other heat providers, this should only be included

as a requirement for development to consider this option rather than making it a safeguarding requirement where it may not be feasible or viable to do so.

East Renfrewshire Council Response

The Council acknowledges and welcomes the supporting comment received. The LDP will take into account the requirements of Policy 19: Heat and Cooling of NPF4 which require the spatial strategy to take into account areas of heat network potential and any designated Heat Network Zones (HNZ). Criteria 16a states that proposals within or adjacent to a Heat Network Zone identified in the LDP will only be supported where they are designed and constructed to connect to the existing heat network. This matter is addressed further under Topic Paper 016: Heating and Cooling.

Gate Check

The Council is of the view that there are no areas of dispute to be considered at Gate Check for this topic.

<p>East Renfrewshire LDP3 Issue Topic Paper 010 - Transport</p>	<p>NPF4 - Sustainable Places Policy 13: Sustainable Transport Policy 15: Local Living and 20-minute neighbourhoods Policy 18: Infrastructure First</p>
<p>Information required by the Act regarding the issue addressed in this section</p>	<p><u>2019 Planning (Scotland) Act</u></p> <p>Section 15(5):</p> <ul style="list-style-type: none"> • the infrastructure of the district (including transport systems); and • how that infrastructure is used. <p>Regulation 9 - Have regard to:</p> <ul style="list-style-type: none"> • any regional transport strategy; and • any local transport strategy.
<p>Links to Evidence</p>	<ul style="list-style-type: none"> • Transport Scotland Road Network (CD 159) • Scottish Transport Statistics 2021 (CD 132) • National Planning Framework 4 (NPF4) 2023 (CD 102) • Transport Scotland Development Planning and Management Transport (Appraisal Guidance (DPMTAG) (CD 158) • Scotland's Climate Change Plan update (2020) (CD 106) • National Transport Strategy for Scotland (NTS2) (CD 052) • Transport Scotland's Strategic Transport Projects Review (STPR2) (CD 161) • Scottish Government Infrastructure Investment Plan (IIP) (2021-26) (CD 110) • Scottish Government Programme for Government (2023) (CD 114) • Transport Scotland's Route Map to Achieve a 20 per cent Reduction in Car Kilometres by 2030 (CD 160) • Paths for All National Survey of Attitudes to Walking and Wheeling in Scotland (2023) (CD 070) • Strathclyde Partnership for Transport (SPT) Regional Transport Strategy (2023) (CD 190) • City Deal project (CD 215)

	<ul style="list-style-type: none"> • East Renfrewshire adopted Local Development Plan 2 (March 2022) (CD 206) • East Renfrewshire Local Transport Strategy LTS Case for Change Report (CD 256) • East Renfrewshire Roads Asset Management Plan (RAMP) 2024 (CD 266) • East Renfrewshire Transport Network Interactive Map (CD 286) • East Renfrewshire Local Living GIS interactive online mapping toolkit (CD 255) • Strathclyde Partnership for Transport (SPT) - Park and Ride Facilities (CD 189) • East Renfrewshire Council Good Practice Guide for Residential Development Roads (CD 222) • Scottish Government's policy document Designing Streets (CD 121) • National Roads Development Guide (CD 051) • 2022 Sustrans Hands Up Scotland Survey (HUSS) (CD 154) • Electric vehicle charging devices by local authority (CD 017) • ChargePlace Scotland (CD 009) • SPT Strategic Connectivity map (CD 227) • SPT Local Connectivity map (CD 228) • Site Assessment Framework (SD 001)
--	--

Summary of Evidence

The purpose of this topic paper is to provide background information on the subject of transportation. This topic paper looks at the issues which influence the transportation needs of local residents. The Topic Report explains the current transport network across East Renfrewshire focusing upon the road, rail and bus networks and upon active travel and outlines the Council's commitment to produce a transport appraisal to support the Proposed Plan.

The provision of appropriate transport infrastructure is important to ensure that new developments have access to sustainable means of transport to provide access to work, schools and local facilities. Improving local access, providing more sustainable and inclusive transport choices, influencing land use patterns around existing transport infrastructure and providing reliable, convenient connections between places should be key requirements of a future transport network.

Section 1 outlines the outlines the transport context and some of the key challenges that require to be considered in LDP3 and the emerging Local Transport Strategy. A series of key facts and

projections and data on travel patterns and behaviour is set out in the Topic Paper 26: Socio-Economic. This section recognises the importance of rebalancing the transport network in favour of sustainable modes. However, car ownership and usage is increasing within the area with outward commuting patterns and high rates of car use for all journeys.

There are good rail and bus connections from most of the larger settlements into Glasgow City Centre itself, however the key issue arises when people wish to travel across East Renfrewshire between the Levern and Eastwood areas or to other local authority locations. The lack of a well-connected active travel network and infrastructure is also a barrier to the uptake of more cycling within the area. The Local Living neighbourhood concept will be a key element in transport policy going forward as evidenced through Topic Paper 12: Local Living.

Section 2 outlines the Transportation Policy Context and recognises the requirement for a transport appraisal to inform the Proposed Plan. National developments set out in NPF4 are also referenced including the Central Scotland Green Network, Urban Mass / Rapid Transit Networks and the National Walking, Cycling and Wheeling Network.

Section 3 provides an overview of national, regional and local transportation strategies that inform LDP3 as highlighted in the evidence links section above. This includes the National Transport Strategy 2 for Scotland, Strategic Transport Projects Review 2 and the Infrastructure Investment Plan (IIP). The IIP outlines 2 key sub regional rail transport projects for East Renfrewshire: East Kilbride Rail Enhancement; and Barrhead Rail Enhancement. Regional strategies include the Regional Transport Strategy, City Deal projects and at the local level the merging Local Transport Strategy.

Section 4 provides an overview of the Existing Transport Network within East Renfrewshire. The local road network and associated infrastructure represents a critical component of East Renfrewshire's transport network, connecting people and places with services and opportunities, as well as the conveyance of goods necessary for growth and wellbeing. The Transport Network within East Renfrewshire is well developed with linkages to surrounding areas, a key linkage being with Glasgow city centre to the north as shown by Figure 3 in the Topic Paper. An overview of public transport, active travel, parking and electric vehicle charging infrastructure is provided.

Section 5 sets out the implications for LDP3, which have been informed by the analysis and outputs in the report.

The LDP3 Evidence Report SEA Scoping Report (April 2024) defines the scope/level of detail to be covered in the Environmental Report for the Proposed Plan. Section 4 provides an overview of the environmental characteristics of East Renfrewshire. Table 2 sets out the SEA objectives relating to each SEA theme which includes a section on transport considerations within the Climatic Factors, Human health, Air and Hazards and Population and Place themes.

Summary of Stakeholder Engagement

Section 4 'Engagement Statement' of the Evidence Report summarises the various engagement and consultation activities that have been undertaken to inform the Evidence Report. This includes collaborative working with Key Agencies and other stakeholders in the preparation of Topic Papers and the Play Sufficiency Assessment, and other place-based engagement and workshops.

A series of Topic Papers were prepared structured around the sustainable, liveable and productive places themes of National Planning Framework 4.

Wider external engagement with stakeholders commenced on 12th April and ended on 10th May 2024, inviting people interested in LDP3 to review the Topic Papers that cover their areas of interest and to share their comments. The aim of the engagement was to establish areas of agreement or disagreement and any additional evidence that should be taken into account.

The Topic Papers were published on the Council's Local Development Plan Hub on Commonplace, and through the Council's LDP3 website, Facebook and Twitter account and email notifications were sent to individuals and organisations listed on the LDP contact database.

The SEA Scoping Report was submitted to the SEA Gateway consultation authorities on 19th April for a 6-week consultation period. The Gateway Authorities were generally supportive of the Scoping Report subject to a few points for consideration for the Environmental Report to be prepared alongside the Proposed Plan. Comments are summarised in Section 4 Table 1 of the Evidence Report.

Summary of Implications for the Proposed Plan

Transport is a key contributor to wider societal benefits such as health and well-being, placemaking and economic growth. The choices that are made at the Proposed Plan stage are integral to the sustainability of our area as a whole, such as where development is located, and how we choose to accommodate travel demand.

We recognise there are a range of challenges and opportunities for transport across the Council area, and that there is significant variation in levels of connectivity and car reliance. However, it is clear that in order to accommodate housing and other growth sustainably, we must provide transport opportunities that enable people currently making trips by car to choose a more sustainable alternative. LDP3 will seek to ensure that growth is delivered as part of the drive to decarbonise our transport network. Our approach will follow the sustainable transport hierarchy.

Through LDP3 the Council will develop a place-based approach to support infrastructure requirements and work collaboratively with Transport Scotland, SPT and other partners to implement this approach. The phasing and programming of residential and mixed-use sites will be a critical element of the LDP's approach to ensure land comes forward in a planned way; to provide a consistent supply of land over the plan period; and to ensure that any infrastructure requirements are delivered. However, delivering the housing growth identified in the Housing Topic Paper presents a core challenge to accommodate increased mobility needs of the population whilst supporting progress towards our Climate and nature recovery commitments. Furthermore, the economic aspirations set out within the Economic Topic Paper and their impact upon the transport network need to be considered in LDP3.

The Plan will link with the emerging Local Transport Strategy (LTS) to improve east-west public transport connectivity, enhance public transport service connectivity between settlements and essential services, reduce car dependency, enhance coverage of electric vehicle charging infrastructure and facilitate a transition from car-based design in order to support wider place and wellbeing outcomes. However, further investment across the area is needed in public transport and active travel infrastructure including improvements to existing active travel networks to make them safer and more attractive, thereby encouraging greater use.

The Plan will seek to ensure that the spatial approach does not compromise the ability to deliver equitable and inclusive transport for all, by providing people with a range of travel opportunities, enabling those that can travel sustainably to do so, potentially reducing congestion and freeing up existing road capacity for those that do still need to use it. This is reflective of the fact that rural areas generally have poorer access to public transport and more limited access to services and facilities. It is not always possible to provide easy walking and cycling distances to all everyday services and facilities in rural areas so there will be some reliance on private vehicles.

The Council will work collaboratively with Transport Scotland, SPT and partners to undertake transport infrastructure modelling through a Transport Appraisal that reflects agreed mixed use and residential site allocations identified through the Proposed Plan stage to ensure comprehensive transport solutions are implemented, including the requirement for any development contributions. The Council will agree the scope, nature and scale of the Transport Appraisal with Transport Scotland, including the potential use of the LATIS model (Land Use and Transport Integration in Scotland). Following this, transport strategies to support the Plans spatial approach will be developed. The Council will also continue to work in partnership with Network Rail and Transport Scotland to ensure the area has an excellent rail service and improve services within and beyond the Council boundary.

Transportation evidence forms a core component of the Site Assessment Framework (SD 001) and will also be crucial in identifying potential spatial options for the proposed plan.

The potential for improving the economic prospects through longer term improvements to the M77 Road corridor should be investigated within the Plan period. This corridor is well placed for access to the central Scotland economy and regional job market and is attractive for business investment. However, potential future growth would need to be balanced with the approaches identified within NPF4, i.e. a focus on local living with investment moving away from locations that can only be reached by car towards more accessible areas that are connected by low-carbon and active travel options. Strengthening strategic transport connections remains a high priority however this needs to be balanced with decarbonising transport and improving active travel. From a business perspective, it is also recognised that transport/distribution represents a large percentage of costs and are responsible for significant emissions.

The cross-council boundary nature of transport and travel across the Glasgow and Clyde Valley region and beyond, requires travel needs and behaviours to be understood and planned for, at a regional level. The Council will work with Transport Scotland, SPT and neighbouring authorities to support the implementation of transport schemes that will improve linkages across the region and the transition towards a net zero future.

The 'Local Living' concept provides people with the opportunity to meet most of their daily needs within a reasonable distance of their home, either on-foot/wheelchair, or by bike. This reduces the need to travel which in turn cuts down on private car usage and the consequent need for more road infrastructure and is a key consideration for LDP3. The concept promotes a focus on good design and placemaking, sustainable travel, enhancing green space and biodiversity and mixed-use development including local employment and community opportunities. This is explained in more detail within the 'Local Living' Topic Paper.

The Planning (Scotland) Act 2019 states that in preparing local development plans, planning authorities 'are to have regard to the desirability of preserving disused rail infrastructure for the purpose of ensuring its availability for possible future public transport requirements'. LDP2 aims to safeguard the solums of any former railway lines as future access routes. Many are currently in use or proposed for paths and active travel routes. The LDP will continue to safeguard such

routes, and consider active travel options for their future use, as and when resources allow. The solumns are shown on the [transport network map](#).

Statements of Agreement / Dispute

Statements of Agreement

Transport Scotland

It appears very thorough, and we would agree with the evidence. It is noted your commitment to undertake a proportionate transport appraisal. We have welcomed the engagement with the Council and look forward to continued engagement as the LDP progresses.

Paths for All

Support the aim to provide transport opportunities that enable people currently making trips by car to choose a more sustainable alternative. Welcome the drive to decarbonise the transport network. Welcome the sustainable transport hierarchy. Would welcome investment in public transport and active travel infrastructure including improvements to existing active travel networks to make them safer and more attractive. Active Travel interventions should be evidenced. Reference was made to the 2023 National Survey of Attitudes to Walking and Wheeling in Scotland.

Nature Scot

Broadly agree with the content. Note that the Active Travel Network section (page 21) refers to strategic cycle corridors (Figure 1), however Figure 1 shows the Sustainable Travel Hierarchy. It would be helpful to have a map showing the strategic cycle routes displayed spatially so we would welcome this being included.

Strathclyde Partnership for Transport (SPT)

Broadly agree with the evidence presented. SPT supports the recognition with regards to the need to rebalance transport in favour of sustainable travel modes, and the need to address transport related emission, this section should reflect the wider requirements of the shift to a net zero transport system. A just transition to net zero carbon in the transport sector to be achieved through an integrated set of policies to decarbonise vehicles, shift more travel to active travel and public transport and reduce demand for travel particularly car travel and single occupancy car trips.

Scottish Water

Scottish Water recognises the importance of sustainable transport as a contributor to supporting development in the local catchment area. We would recommend that consideration be made to the positive contributions that could be made to the management and conveyance of surface water. Any change to the surface to create linear networks to move people more sustainably can create space and connections for blue-green infrastructure and positively support the Scottish Government Water Resilient Places Policy Recommendations.

Homes for Scotland, Taylor Wimpey, ICENI On behalf of East Renfrewshire Home Builder Consortium (Mac Mic Group; Miller Homes; Robertson Homes; Taylor Wimpey), ICENI on behalf of The Mac Mic Group, Miller Homes, Cala Management Ltd (CALA), Taylor Wimpey

Agree broadly with the evidence. This paper has potential to link to papers on Local Living, Housing, Green and Blue infrastructure, Placemaking, Health and Wellbeing and Infrastructure. We agree with: Promotion of Sustainable travel Hierarchy; Promotion of 'Local Living'.

Of the NPF4 national developments listed within the topic paper new housing developments of a sufficient scale has the potential to support the delivery of the following:

- 'Central Scotland Green Network' project; and
- 'National Walking, Cycling and Wheeling Network' project.

The Central Scotland Green Network can be expanded through green active travel corridors within larger sites whilst expanding the National Walking, Cycling and Wheeling Network.

The provision of appropriate transport infrastructure is important to ensure that new developments have access to sustainable means of transport to provide access to work, schools and local facilities

Sustainable sites which support local living via sustainable modes of transport should be prioritised to encourage walking, wheeling, cycling and public transport where possible to actively reduce the need for vehicle and reduce the car ownership % in the Council area. Home builders may be able to assist in providing local active travel connections or services to support local living and 20-minute neighbourhoods.

New development and associated traffic growth should be considered through the transport strategy. New development in ERC can support the delivery of infrastructure and better connect the area to public transport and the M77 in line with council objectives.

The refreshed Local Transport Strategy (LTS) will provide a framework for transport decision making and investment over the next 10 years. This information is vital to preparation of LDP3 and to aid future decision making and it should consider the impact of NPF4 national development designations.

CALA welcomes the Strategic Cycle Corridors referred to (especially Busby to Barrhead (No. 4) and Eaglesham to Barrhead (No.5) and supports any proposals that will enhance and maintain these corridors. The enhancement of these routes will provide connectivity and accessibility especially to smaller settlements where there is poorer access to public access and active travel networks. Further housing development in those locations will assist in enhancing and maintaining these connections.

CALA agrees that the frequency of public transport (particularly several bus routes) is low across East Renfrewshire. In addition, it is considered that active travel connectivity across East Renfrewshire still needs further investment. East Renfrewshire's Get to Zero Climate Plan notes the high rate of car ownership and use, and the poor integration between active travel and public transport networks. CALA welcomes the proposal that the Plan aims to develop high quality active travel links across East Renfrewshire. It is important to note that new housing development can assist in facilitating such network improvements.

It is positive that the Council recognises that the 'Local Living' concept provides people to meet most of their daily needs within a reasonable distance from their home. Home builders may be able to assist in providing local active travel connections or services to support local living and 20-minute neighbourhoods. The housing layout may enhance connectivity by incorporating active travel links and provide passive surveillance whilst development of sufficient scale (circa 500 units) could potentially deliver local facilities such as retail units where a gap in provision is identified. New homes are also generally fibre enabled ensuring that the homeowner has the ability to work from home reducing the need to travel.

New housing development can also assist in addressing three of the six key themes set out in the Strategic Transport Projects Review 2 through the provision of active travel links, fibre to assist working from home and EV charging points. The latter two will influence travel behaviours and decarbonise transport.

ERC should support development that aligns with the National Transport Strategy 2 priorities such as reduce inequalities, take climate action, help deliver a wellbeing economy and to improve health and wellbeing.

East Renfrewshire Council Response

The Council acknowledges and welcomes the supporting comments received and recognition that the provision of appropriate transport infrastructure is important to ensure that new developments have access to sustainable means of transport to provide access to work, schools and local facilities. We agree that sustainable sites which support local living via sustainable modes of transport should be prioritised to encourage walking, wheeling, cycling and public transport where possible.

A section on parking has been added to the topic paper.

Support for the 'Local Living' concept, Central Scotland Green Network and the National walking, cycling and wheeling network are welcomed.

A summary and link to the National Survey of Attitudes to Walking and Wheeling in Scotland has been added to the Transport Topic Paper in response to comments from Paths for All.

An interactive transport network and active travel network map has been created and included in the Topic Paper showing the strategic cycle routes in response to comments from NatureScot. This replaces Figure 3.

The offer of connectivity analysis and additional information on bus stop frequency from SPT is welcomed and will help inform future versions of the Local Living analysis.

Links to the priorities and objectives of the Local Transport Strategy (LTS) and National Transport Strategy 2 are noted. These are already covered in the Topic Paper.

Statements of Dispute

Public – Alex Burns

1 comment submitted stating that traffic calming measures have increased car journey times, resulting in an increase in the evolution of greenhouse gases from car combustion engines.

Transport Scotland

It is noted there isn't any information on parking, apart from park and ride, will this be covered in the Infrastructure topic paper? If not, then this could be identified as a gap.

East Renfrewshire Disability Action Group (ERDA)

Taxi provision is not included within the paper, ERDA highlighted the important role of taxis as a transport option for people with a disability, particularly taxis adapted to carry wheelchairs. Currently there are only two taxis capable of carrying wheelchairs, there are an estimated 1400 wheelchair user households in East Renfrewshire.

Scottish Rights of Way and Access Society (ScotWays)

Generally agree with the content of the Transport Topic Paper, subject to the following:

1. Section 4 should refer to horse riding as a form of active travel, not merely cycling, walking and wheeling.
2. Information on the numbers and length of any promoted, recognised or waymarked active travel routes that link East Renfrewshire Councils area with adjoining local authority areas, notably Glasgow City.
3. The number and length of public rights of way and core paths within the Councils area, with reference to the national Catalogue of Rights of Way (CROW) and the Councils Core Paths Plan and list of rights of way; and
4. A breakdown of active travel routes/rights of way in East Renfrewshire by user categories, e.g. cycle routes, equestrian routes etc.

Strathclyde Partnership for Transport (SPT)

Broadly agree with the content of the Transport Topic Paper, subject to the following:

- Replacement of 2nd para of Urban Mass Transit section of Section 2 with revised text.
- Textual changes to Regional Transport Strategy section of Section 3.
- Replacement of SPT investment in East Renfrewshire text of Section 3 with revised text.
- Inclusion of new section on Regional Active Travel Strategy & Network Plan in Section 3.
- Inclusion of new section on Strathclyde Regional Bus Strategy in Section 3.
- Inclusion of new section on Clyde Metro in Section 3.

Homes for Scotland, Cala Management Ltd (CALA), ICENI on behalf of The Mac Mic Group, ICENI on behalf of the Baird Family, Rowallandale Ltd

Homes for Scotland state that to discourage car dominant layouts that SCOTS parking standards are reviewed and parking requirements reduced.

East Renfrewshire Council should, as a minimum, refer to the Transport and Travel data from the 2011 Census, but preferably, depending on the timing of the Gate Check utilise data from 2022 Census which will account for the changes to in travel patterns post covid. This will allow changes to future travel patterns following the implementation of the interventions detailed in the draft paper to be measured.

CALA recognises that the EV charging network in East Renfrewshire is the lowest figure of any Local Authority in Scotland. This is something that can be remedied to some degree through new housing development.

It is positive that the Council recognises that the 'Local Living' concept provides people to meet most of their daily needs within a reasonable distance from their home. Car ownership within ERC is high, therefore, ERC must increase the availability of EV charging points and promote opportunity for active travel to discourage private vehicle use. ERC should increase the number of park and ride facilities; increase integrated transport solutions. Strategic land development has the potential to assist in the delivery of Strategic Transport Projects – Clyde Metro & Glasgow City Region.

If a proposed development site can contribute to an NPF4 National Development, the designation means that the principles of the development does not need to be agreed in later consenting processes. Therefore, strategic development that can contribute to National Developments should be supported. LDPs should take forward proposals for national development where relevant.

ERC must promote innovative solutions in terms of addressing transportation. NPF4 policies will require future development proposals to be advanced in their submission.

In order to enable people currently making trips by car to choose a more sustainable alternatives to allow housing development to come forward, there must be a joined-up approach and informed by the emerging Local Transport Strategy (LTS). It notes that the topic paper states that "further investment across the area is needed in public transport and active travel infrastructure including improvements to existing active travel networks to make them safer and more attractive, thereby encouraging greater use." Should obligations be placed upon developers these should be proportionate and appropriate to the scale and type of development and be subject to negotiation and viability discussions.

Welcome that the Council recognise that due to rural settlement locations, there will be some reliance on private vehicles. There is an opportunity for new housing development to deliver small scale local services and transport improvements proportionate to the development to encourage sustainable modes of transport. The refreshed Local Transport Strategy (LTS) will provide a framework for transport decision making and investment over the next 10 years. This information is vital to preparation of LDP3 and to aid future decision making.

East Renfrewshire Council Response

A section on taxi provision has been added to section 4 of the topic paper in response to comments from East Renfrewshire Disability Action Group (ERDA).

In response to the comments from Scotways the Council would respond as follows:

1. Horseriding has been added to the active travel network text of section 4.
- 2/3. The following information on the numbers of Core Paths and ROW and lengths has been added to the topic paper:
 - 83 Core paths covering 91 miles
 - 63 ROW covering 27 miles
4. Active travel routes are shared by users so breakdown by category is not possible. The only exception would be the A77 cycle path which is built as a segregated cycle path.

The Council agrees that development contributions towards transport infrastructure should be proportionate. Impacts upon the transport network and active travel infrastructure and solutions to addressing transportation matters will be informed by the Transport Appraisal that will be prepared at Proposed Plan stage. This will be prepared collaboratively with Transport Scotland, SPT and partners.

The revisions proposed by SPT have been incorporated into the revised Topic Paper as requested.

The Topic Paper has been prepared in collaboration with the Councils Roads Service. The importance of the emerging Local Transport Strategy in informing LDP3 is recognised and supported. Links to the priorities and objectives of the Local Transport Strategy (LTS) and National Transport Strategy 2 are noted. These are addressed in the Topic Paper. Any increase to 'Park and Ride' facilities will be undertaken in partnership with SPT and through the LTS.

The Housing Topic Paper recognises that to meet the indicative housing land requirement sites will need to be allocated over a range of geographies and settlements.

Parking information and standards are set out in the Councils 'Good Practice Guide for Residential Development Roads' document. The Planning Service will continue to work closely with the Roads Service in preparation of LDP3 and relevant masterplans and development briefs.

2011 census transport data is included within Topic Paper 026: Socio-Economic. It is worth noting that the Evidence Report is a snapshot in time. The evidence may change between the time the Evidence Report is agreed by Council, submitted for Gatecheck and during the preparation of the Proposed Plan. The Proposed Plan will be based on the most up-to-date evidence at the time, including the use of the 2022 census data if available. The Strategic Planning Team will ensure the evidence remains up to date throughout the process.

The Council is supportive of working with the development industry to improve the EV charging infrastructure across the area.

The Evidence Report clearly acknowledges in section 1 the linkages between topic papers.

Gate Check

The Council is of the view that there are no areas of dispute to be considered at Gate Check for this topic.

<p>East Renfrewshire LDP3 Issue Topic Paper 011 - Placemaking</p>	<p>NPF4 – Liveable Places Policy 14: Design, quality and place</p>
<p>Information required by the Act regarding the issue addressed in this section</p>	<p><u>2019 Planning (Scotland) Act</u></p> <p>Section 15(5):</p> <ul style="list-style-type: none"> • the principal physical, cultural, economic, social, built heritage and environmental characteristics of the district. <p>Section 15(2A):</p> <ul style="list-style-type: none"> • a statement of the planning authority’s policies and proposals as to the provision of public conveniences. <p>Section 15(2B):</p> <ul style="list-style-type: none"> • a statement of the planning authority’s policies and proposals as to the provision of water refill locations. <p><u>Local Place Plans (LPPs)</u></p> <p>Section 15A(a):</p> <ul style="list-style-type: none"> • requires a planning authority to invite local communities to prepare LPPs. <p>Section 16B (3) (d):</p> <ul style="list-style-type: none"> • to set out how the authority have invited local communities to prepare LPPs, and what assistance they have provided.

Links to Evidence

- [Place Standard tool](#) (CD 069)
- East Renfrewshire [Local Living GIS interactive online mapping toolkit](#) (CD 255)
- [National Planning Framework 4 \(NPF4\) 2023](#) (CD 102)
- Scottish Government [Local living and 20 minute neighbourhoods - planning guidance \(April 2023\)](#) (CD 111)
- SPT Strategic Connectivity map (CD 227)
- SPT Local Connectivity map (CD 228)
- East Renfrewshire [adopted Local Development Plan 2 \(March 2022\)](#) (CD 206)
- East Renfrewshire [Development Plan Scheme](#) 2024 (CD 235)
- East Renfrewshire LDP3 Pre-Engagement Survey (CD 249)
- [East Renfrewshire Your Place Survey](#) (CD 277)
- East Renfrewshire Your Place Young People Survey (CD 278)
- East Renfrewshire Your Place Children's Survey (CD 276)
- [East Renfrewshire Local Action Plans](#) (CD 250)
- East Renfrewshire [Local Place Plans](#) (CD 196)
- East Renfrewshire Transport and Place Workshops (CD 272)
- East Renfrewshire Play Sufficiency Assessment (CD 260)
- [Changing Places Toilets](#) (CPT) (CD 008)
- [Scottish Water refill point](#) (CD 136)

Summary of Evidence

This Topic Paper provides an overview of the concept of placemaking and describes placemaking engagement activities undertaken to inform LDP3.

Section 1 describes the Placemaking context. Placemaking is a design-led approach to development at all scales. This approach allows the creation of quality places that people want to live, work, play and learn in. Creating good quality places will promote people's health, happiness and wellbeing whilst concerning the environment we live in; the people that inhabit these spaces; and the quality of life that comes from the interaction of people and their surroundings. The Topic paper discusses linkages with the Place Standard Tool and the Council's approach to Local Living.

Section 2 outlines the Policy Context which includes NPF4 and the Council's adopted LDP2. Reference is also made to the Council's emerging Placemaking Supplementary Guidance.

Section 3 describes Placemaking Engagement activities undertaken to inform LDP3. This includes:

- LDP3 Pre-Engagement Survey which informed the Council's Development plan Scheme and find out how communities and other stakeholders wanted to engage on LDP3;
- Your Place Surveys – 3 place surveys based upon the Place Standard Tool – All ages, Young People and Children surveys;
- Local Action Plans - placed based approach for 8 of our town and neighbourhood centres;
- Local Place Plans – a summary of the action undertaken by the Council to promote this type of plan;
- Transport and Place Workshops - series of workshops in local primary schools to gather evidence for both the new Local Development Plan and the Local Transport Strategy; and
- Play Sufficiency Assessment (PSA) – engagement activities that were undertaken to inform the preparation of the Council's first PSA.

Section 4 provides an overview of the Council's approach towards public conveniences and water refill locations.

Section 5 sets out implications for LDP3 which have been informed by the analysis and outputs in the report.

The LDP3 Evidence Report SEA Scoping Report (April 2024) defines the scope/level of detail to be covered in the Environmental Report for the Proposed Plan. Section 4 provides an overview of the environmental characteristics of East Renfrewshire. Table 2 sets out the SEA objectives relating to each SEA theme. Placemaking considerations are addressed under the Cultural Heritage and Population and Place themes.

Summary of Stakeholder Engagement

Section 4 'Engagement Statement' of the Evidence Report summarises the various engagement and consultation activities that have been undertaken to inform the Evidence Report. This includes collaborative working with Key Agencies and other stakeholders in the preparation of Topic Papers and the Play Sufficiency Assessment, and other place-based engagement and workshops.

A series of Topic Papers were prepared structured around the sustainable, liveable and productive places themes of National Planning Framework 4.

Wider external engagement with stakeholders commenced on 12th April and ended on 10th May 2024, inviting people interested in LDP3 to review the Topic Papers that cover their areas of interest and to share their comments. The aim of the engagement was to establish areas of agreement or disagreement and any additional evidence that should be taken into account.

The Topic Papers were published on the Council's Local Development Plan Hub on Commonplace, and through the Council's LDP3 website, Facebook and Twitter account and email notifications were sent to individuals and organisations listed on the LDP contact database.

The SEA Scoping Report was submitted to the SEA Gateway consultation authorities on 19th April for a 6-week consultation period. The Gateway Authorities were generally supportive of the Scoping Report subject to a few points for consideration for the Environmental Report to be prepared alongside the Proposed Plan. Comments are summarised in Section 4 Table 1 of the Evidence Report.

Summary of Implications for the Proposed Plan

LDP3 will seek to embed strong placemaking principles within its policy framework. Separate topic papers on carbon mitigation and adaptation, flood risk, green infrastructure, transport and active travel, housing and infrastructure first all link with good 'placemaking'. LDP3 will also seek to promote the concept of Local Living and incorporate this into future master plans and development briefs.

LDP3 provides the opportunity to ensure that the principles of place making are front and centre in the Plan and underpin all the thematic/technical policies.

The Council will seek to publish a draft Placemaking Supplementary Guidance during summer/autumn 2024 to provide further context on this matter and to help inform the approach for future master plans and development briefs.

Statements of Agreement / Dispute

Statements of Agreement

Taylor Wimpey, ICENI On behalf of East Renfrewshire Home Builder Consortium (Mac Mic Group; Miller Homes; Robertson Homes; Taylor Wimpey), ICENI on behalf of The Mac Mic Group, Miller Homes

Broadly agree with the evidence. Future development has the potential to create new distinctive places and enhance existing amenities and infrastructure within ERC. Strategic land releases should be supported where development promotes a sense of place and placemaking principles. There needs to be a recognition that new development can support the concept of Local Living and good sustainable placemaking.

Taylor Wimpey agree LDP3 placemaking should promote local living, the interactive map provided by ERC is useful in determining what facilities are currently in place. Consideration should be given to what land releases can provide in terms of services and betterment for the existing and new community.

Depending on the scale of development, placemaking policies / guidance should promote design that reflects the locality but also, where necessary, allows for new masterplan sites to be distinctive. This will help promote distinctive places in line with NPF4.

Evidence report gathering should actively take opportunities to engage with developers and landowners on housing delivery and placemaking concepts. The Council and developers must recognise each site and its surroundings is different and development design must ensure a sense of place is created.

LDP3 should recognise the place value of new development. Future development has the potential to create new distinctive places and enhance existing amenities and infrastructure within ERC. Strategic land release should be supported where development promotes a sense of place and placemaking principles.

New, efficient housing can contribute to placemaking and the journey to achieving climate led goals in achieving local living concepts.

Socio-economic benefits of housing delivery are vital to consider. Infrastructure investment and developer contributions can promote and enhance an areas sense of place.

New, efficient housing can contribute to placemaking and the journey to achieving climate led goals in achieving local living concepts.

ICENI on behalf of the Baird Family, Rowallandale Ltd

Whilst placemaking is an important element to design led development, LDP3 should avoid placing restrictive policies which prevents housing from coming forward. The Council recognises that not all development can come forward in urban, already built up areas, thus policy challenges around sustainability, local living, reducing carbon emissions in Green Belt or less well connected areas (but where those locations suit a purpose to meet the urgent housing need for the Council) will need to be overcome. There needs to be a recognition that new development through placemaking principles can support the concept of Local Living and good sustainable placemaking, where the right infrastructure is accounted or safeguarded for.

Scottish Water

Will continue to participate and collaborate in place-based discussions along with other key agencies to support the delivery of quality places in and around the East Renfrewshire area.

East Renfrewshire Council Response

The Council acknowledges and welcomes the supporting comments received. The Topic Paper clearly states that the principles of placemaking should be front and centre in the LDP. The importance of design and placemaking and 'Local Living' will be critical in informing the approach to future masterplans and development briefs for sites allocated through LDP3. The Council acknowledges the benefits of collaborative working with key agencies, the development industry and other stakeholders in the preparation of these documents.

The socio-economic benefits of housebuilding are acknowledged within section 6 of Topic Paper 22: Economic Development. Similar wording has been added to section 1 Topic Paper 13: Housing to reflect this matter.

Statements of Dispute

Homes for Scotland, Cala Management Ltd (CALA)

The Topic Paper states that Local Living is a place-based method of achieving connected and compact neighbourhoods designed in such a way that all people can meet the majority of their daily needs within a reasonable walk, wheel or cycle (within approx. 800m) of their home. This reference to 800m requires to be more fully explained – neither National Planning Framework (NPF) 4 nor the Local development planning guidance (2023) (“the Guidance”) refer to an 800m metric.

The draft Topic Paper states that the Council will seek to publish a draft Placemaking Supplementary Guidance during summer/autumn 2024 to provide further context on this matter and to help inform the approach for future master plans and development briefs. This information should be provided now. Section 22 of the Town and Country Planning (Scotland) Act 1997 (“the 1997 Act”) pertaining to supplementary guidance was repealed by Section 4 of the Planning (Scotland) Act 2019.

Furthermore, the Scottish Government has recently published relevant guidance on these matters; and is consulting on draft masterplan consent area guidance. Preparation of local-level guidance on these matters risks creating an increased scope for conflict between local guidance and national guidance.

Cala Management Ltd (CALA)

CALA believe there should be greater recognition given to the benefits that new developments can bring for placemaking, particularly if they occupy a sustainable location with good access to key local infrastructure. They can help to improve local networks and connectivity and boost local centres with increased local spending.

CALA strives to deliver better design and the transition to net zero, however, consideration must be given to the costs associated with development and the viability issues this can present. NPF4 creates significant new challenges and numerous new information requirements to demonstrate that developments comply with policy. Design quality is already carefully controlled through the Design Review Panel and building standards and CALA have rigorous design standards that they apply to all new developments.

ICENI on behalf of the Baird Family, Rowallandale Ltd

The section which outlines place making engagement and activities that the Council has undertaken to inform the Evidence Report does not make any reference to engagement with developers/ landowners on how delivery of development may be a key to unlocking place based strategies.

East Renfrewshire Council Response

Comments on the approach to Local Living are addressed under the Council’s response to Topic Paper 12.

The Council acknowledges that Supplementary Guidance (SG) does not form part of a new style LDP under the 2019 Planning (Scotland) Act. However, the transitional arrangements allow Local Authorities to continue to prepare SG provided it is adopted before March 2025. The Council continues to see benefit in the preparation of a Placemaking SG.

The Council welcomes the commitment by the development industry to deliver better designed places. The Council also recognises that viability of proposal remains a consideration. This will be addressed through the application of the Development Contributions SG.

The Council met with Homes for Scotland and 3 of its members at a meeting on 9th May to discuss the Evidence Report. The Development Plan Scheme, Section 3 of the Evidence Report and Topic Paper 14: Infrastructure First clearly acknowledge the importance of partnership working with

the development in the preparation of LDP3 and its supporting documents with the aim of providing well designed sustainable places across East Renfrewshire.

Gate Check

The Council is of the view that there are no areas of dispute to be considered at Gate Check for this topic.

<p>East Renfrewshire LDP3 Issue Topic Paper 012 - Local Living</p>	<p>NPF4 - Liveable Places Policy 15: Local living and 20-minute neighbourhoods</p>
<p>Information required by the Act regarding the issue addressed in this section</p>	<p><u>2019 Planning (Scotland) Act</u></p> <p>Section 15(5):</p> <ul style="list-style-type: none"> the principal physical, cultural, economic, social, built heritage and environmental characteristics of the district.
<p>Links to Evidence</p>	<ul style="list-style-type: none"> National Planning Framework 4 (NPF4) 2023 (CD 102) Scottish Government Local living and 20 minute neighbourhoods - planning guidance (April 2023) (CD 111) East Renfrewshire Local Living GIS interactive online mapping toolkit (CD 255) SPT Strategic Connectivity map (CD 227) SPT Local Connectivity map (CD 228) AHAH (the index of 'Access to Health Assets and Hazards') (CD 296) Priority Places for Food Index (CD 295) Residential Mobility Index (CD 050) East Renfrewshire Place to Grow (CD 260) Site Assessment Framework (SD 001) Rural Settlement Profiles (SD 005)
<p>Summary of Evidence</p>	
<p>This Topic Paper provides an overview of the 'Local Living' concept and the Council's interactive mapping toolkit.</p> <p>Section 1 outlines what a local living neighbourhood means. The concept of local living was identified as one of the overarching spatial principles in National Planning Framework 4 (NPF4). Policy 15 'Local living and 20-minute neighbourhoods 'of NPF4 and the supporting draft Local living and 20-minute neighbourhoods - planning guidance (April 2023) sets out the policy context for considering the Local Living concept and how this links with the Scottish Governments Place Standard Tool.</p> <p>Local Living is a place-based method of achieving connected and compact neighbourhoods designed in such a way that all people can meet the majority of their daily needs within a reasonable walk, wheel or cycle of their home. This approach will help the Council address challenges of reducing carbon emissions to achieve net zero emissions by 2045, whilst meeting the need for new development.</p>	

The Council has developed a Local Living GIS interactive online mapping toolkit to support the preparation of LDP3 and decision making across multiple service areas and council processes. The toolkit is described in Appendix A of the Topic Paper.

Section 2 outlines the key features and outcomes of a local living neighbourhood. This is summarised in diagram 1.

Section 3 describes how the Council will apply the concept and how it will inform decision making. This includes asset management, LDP3, supporting funding applications and informing development proposals amongst others.

Section 4 summarises the key findings and implications for LDP3, which have been informed by the analysis and outputs in the report.

The LDP3 Evidence Report SEA Scoping Report (April 2024) defines the scope/level of detail to be covered in the Environmental Report for the Proposed Plan. Section 4 provides an overview of the environmental characteristics of East Renfrewshire. Table 2 sets out the SEA objectives relating to each SEA theme. Local Living considerations are addressed under the Climatic Factors and Population and Place themes.

Summary of Stakeholder Engagement

Section 4 'Engagement Statement' of the Evidence Report summarises the various engagement and consultation activities that have been undertaken to inform the Evidence Report. This includes collaborative working with Key Agencies and other stakeholders in the preparation of Topic Papers and the Play Sufficiency Assessment, and other place-based engagement and workshops.

A series of Topic Papers were prepared structured around the sustainable, liveable and productive places themes of National Planning Framework 4.

Wider external engagement with stakeholders commenced on 12th April and ended on 10th May 2024, inviting people interested in LDP3 to review the Topic Papers that cover their areas of interest and to share their comments. The aim of the engagement was to establish areas of agreement or disagreement and any additional evidence that should be taken into account.

The Topic Papers were published on the Council's Local Development Plan Hub on Commonplace, and through the Council's LDP3 website, Facebook and Twitter account and email notifications were sent to individuals and organisations listed on the LDP contact database.

The SEA Scoping Report was submitted to the SEA Gateway consultation authorities on 19th April for a 6-week consultation period. The Gateway Authorities were generally supportive of the Scoping Report subject to a few points for consideration for the Environmental Report to be prepared alongside the Proposed Plan. Comments are summarised in Section 4 Table 1 of the Evidence Report.

Summary of Implications for the Proposed Plan

Across East Renfrewshire there is a mixture of larger urban areas, smaller rural villages and a large rural hinterland to the south of the Council area which raises challenges in implementing the concept of Local Living. The urban areas comprise established built-up areas with limited vacant land and buildings (as evidenced through the Brownfield, Vacant, Derelict and Contaminated land Topic Paper), where the provision of new services and infrastructure cannot easily be delivered.

A high-level assessment of the analysis shows that some communities across East Renfrewshire have the required services and infrastructure that would allow them to be classified as Local Living neighbourhoods. This is the case across both urban and rural settlements. However, this high-level assessment does not conclude whether the required quality of services or infrastructure is currently in place. Information gathered through the LDP3 Place Surveys and Local Action Plans will assist with gathering community's views on the quality and provision of services and facilities.

The analysis shows that the communities within the established parts of East Renfrewshire have access to a good range of services and facilities. It shows that those living within Neilston; central Barrhead; central parts of Newton Mearns; Giffnock; Stamperland; central Clarkston; Thornliebank; and Busby are all within walking distances of East Renfrewshire's services and facilities. Those living within these areas possess high levels of accessibility to the transport network.

However, infrastructure delivery has generally not kept pace with the delivery of housing provision in newly established communities located towards the urban fringe. The lower density of housing and limited-service provision in these areas tends to lead to an increase in walking, wheeling, and cycling travel distances for communities and greater reliance on the private car(s). Limited access to rail and less frequent bus services to some of these areas can also exacerbate the issue.

This is a topic future plans will need to consider through master plans and development briefs. The phasing and programming of residential and mixed-use sites will be a critical element of the LDP's approach to ensure land comes forward in a phased planned way; to provide a consistent supply of land over the plan period; and to ensure that any infrastructure requirements are delivered.

Rural areas generally have poorer access to public transport and more limited access to services and facilities. It is not always possible to provide easy walking and cycling distances to all of the everyday services and facilities that people require to access in rural areas, so there will continue to be some reliance on private vehicles. The Local Living concept will therefore be more challenging in the rural areas and would require the broadening of the definition to a scale greater than 20 minutes. The viability of providing additional services and facilities in rural areas is challenging and locating services strategically to serve a cluster of settlements needs to be considered through LDP3 such as a larger settlement providing the services and facilities for the settlements around or near it. Applying the Local Living approach in rural areas needs to capitalise on rural assets and strengths, such as the sense of community; culture and history; the capacity to produce food and energy; and social enterprises, as part of the solution to delivering the agenda. Further information is set out in the Rural Settlement Profiles (SD 005).

LDP2 supports infill residential development compatible with local character and function, however, the provision of additional housing to support the viability of existing services and the delivery of new services, through limited expansion of rural settlements, also needs to be

considered through the spatial options for LDP3. This approach would help meet wider housing needs and the indicative Housing Land Requirement as described in the Housing Topic Paper.

The Local Living toolkit will be a key factor when developing master plans or development briefs for new sites brought forward through LDP3 and will inform the Site Assessment Framework (SD 001). This will help identify gaps in service provision and ensure new sites are well integrated and connected within existing communities, whilst recognising that this will not address all issues. New development can provide an opportunity to shape and improve places, for example by providing infrastructure needed by existing communities and creating environments that promote health and well-being.

Evidence gathered through the LDP3 Place Surveys, the Local Action Plans and other relevant place-based studies will also help to inform the approach for LDP3.

Statements of Agreement / Dispute

Statements of Agreement

Paths for All

Welcome the commitment to Local Living.

Scottish Water

Agrees with the high-level overview presented within this topic paper. We will continue to work closely with East Renfrewshire Council to support the place-based method and would encourage continued early engagement with Scottish Water to best facilitate this approach.

Strathclyde Partnership for Transport (SPT)

Broadly agree with the evidence presented. The references to inclusive and easy access to public transport, alongside enhanced active travel connections are welcome. However, we suggest that this topic paper notes the role of public transport in providing sustainable travel connections to services/amenities which it is not practical to provide at a local level, such as tertiary education or acute healthcare locations.

Taylor Wimpey, Miller Homes, ICENI On behalf of East Renfrewshire Home Builder Consortium (Mac Mic Group; Miller Homes; Robertson Homes; Taylor Wimpey), ICENI on behalf of The Mac Mic Group

We agree with the concept of local living and support the recognition that new housing can deliver new and supplement existing 20-minute neighbourhoods, enhancing the sustainability of settlements and locations across East Renfrewshire.

We acknowledge and welcome that the Topic Paper notes that the concept of Local Living will need to be adjusted to suit local circumstances and needs.

East Renfrewshire Council Response

The Council welcomes and acknowledges the supporting comments received.

Comments by SPT on the role of public transport in proving access to tertiary education such as universities is noted. Additional text has been added to section 3 of the Topic Paper to reflect this matter.

Statements of Dispute

Public – Billy Clark

It was stated that the link to the GIS map did not work.

Homes for Scotland, Cala Management Ltd (CALA), Taylor Wimpey, Miller Homes, ICENI On behalf of East Renfrewshire Home Builder Consortium (Mac Mic Group; Miller Homes; Robertson Homes; Taylor Wimpey), ICENI on behalf of The Mac Mic Group, ICENI on behalf of the Baird Family, Rowallandale Ltd

The Topic Paper states that Local Living is a place-based method of achieving connected and compact neighbourhoods designed in such a way that all people can meet the majority of their daily needs within a reasonable walk, wheel or cycle (within approx. 800m) of their home. This reference to 800m requires to be more fully explained – neither National Planning Framework (NPF) 4 nor the Local development planning guidance (2023) (“the Guidance”) refer to an 800m metric. The recently published Scottish Government Planning Guidance: Local living and 20-minute neighbourhoods (2024) uses a 20-minute metric where people cycling will have a larger neighbourhood than people walking.

This is vital if the Council is to achieve housing delivery in line with the current demand in the authority area.

Homes for Scotland, Cala Management Ltd (CALA), Miller Homes, Taylor Wimpey, ICENI On behalf of East Renfrewshire Home Builder Consortium (Mac Mic Group; Miller Homes; Robertson Homes; Taylor Wimpey), ICENI on behalf of The Mac Mic Group

The draft Topic Paper points towards Local Living being a matter to be weighed against other planning considerations at the detailed site assessment stage. It should also be noted that larger-scale housing developments, by way of the integration of mixed uses, may be able to create new 20-minute neighbourhoods which would be compliant with National Planning Framework (NPF) 4 aspirations.

New development can provide an opportunity to shape and improve places. This can be done by strengthening current community facilities with new schools, primary care practices, and playgrounds to best meet the needs of local people in place. New populations can also contribute to the vitality and sustainability of current community facilities, often through additional investment and spending in local services. It is therefore critical that the Council seek to allocate new large-scale housing-led mixed-use allocations. This will both deliver new (and supplement existing) 20-minute neighbourhoods, enhancing the sustainability of settlements/locations across East Renfrewshire.

Taylor Wimpey, Miller Homes, ICENI On behalf of East Renfrewshire Home Builder Consortium (Mac Mic Group; Miller Homes; Robertson Homes; Taylor Wimpey), ICENI on behalf of The Mac Mic Group, ICENI on behalf of the Baird Family, Rowallandale Ltd

Access to public transport should be included in the indicators (eg bus stops and rail stations). Public transport is key for connecting people unable to walk, wheel or cycle (eg children, older people or people with disabilities) to community facilities. This is also particularly important in rural and semi-rural locations, where community facilities may not be situated within a 20-minute walk.

Miller Homes, Taylor Wimpey, ICENI On behalf of East Renfrewshire Home Builder Consortium (Mac Mic Group; Miller Homes; Robertson Homes; Taylor Wimpey), ICENI on behalf of The Mac Mic Group

The Topic Paper refers to 'a reasonable walk, wheel or cycle'. We note that, for certain community facilities (such as allotments or libraries), a 20-minute cycle would be a more appropriate measurement.

There are data limitations surrounding the availability of Affordable Housing opportunities and Allocated Affordable Housing sites. These data limitations could inhibit the ability to include these receptors in any future local living assessments.

Information about how regularly East Renfrewshire Council is planning to update the Local Living GIS Toolkit would be useful.

We suggest that some of the selected indicators for the Local Living Mapping Toolkit should be removed or considered at a wider accessibility is more appropriate:

- Swimming pool - for viability purposes, these traditionally operate on larger catchment areas and tend to be located in areas of higher population.
- Petrol stations – while we understand that these can serve as useful retail functions in smaller settlements, their inclusion within the toolkit appears slightly contradictory with aspirations on page 2 to 'significantly reduce the need to use unsustainable modes of travel'
- Additional needs schools – again, our understanding is that there is only one school for children with additional support needs within East Renfrewshire, meaning that this feature is unlikely to be captured in the vast majority of Local Living assessments.

Cala Management Ltd (CALA), ICENI on behalf of the Baird Family, Rowallandale Ltd

It is welcomed that the Council recognises that the Local Living concept will be more challenging in the rural areas and would require the broadening of the definition to a scale greater than 20 minutes. A flexible approach should be applied, especially on settlement edges where suitable locations can be developed creating new neighbourhoods within a town or village, but that village itself may have limited services.

It is considered that a 20 minute one way journey (rather than a 20 minute return journey) is more applicable in the East Renfrewshire context to account for varying factors such as age, gender, disability, accompanying children and household income to name a few. This is backed up by research by Living Streets which indicates that a 20 minute distance may apply only loosely to the Scottish population. It is also worth noting that the 20 minute return journey will be challenging for some of the more rural and semi-rural areas of East Renfrewshire.

It is also encouraging that the Council are already considering that the provision of additional housing to support the viability of existing services and the delivery of new services, through limited expansion of rural settlements, needs to be considered through the spatial options for LDP3.

Allocations on green belt can occupy a sustainable location, continuing to provide robust settlement boundaries but also supports housing needs and new infrastructure in a rural settlement. In the 2021 Report of Examination for Local Development Plan (LDP) 2, the Reporter concluded on page 28 'that there is no known barrier to the delivery of allocated housing sites in relation to infrastructure provision.'

When acknowledging that the viability of providing additional services and facilities in rural areas is challenging, further consideration should be given into the marketability and deliverability of sites when allocating through LDP3.

Cala Management Ltd (CALA)

As noted, new development can provide an opportunity to shape and improve places, for example by providing active travel infrastructure, however further consideration should be given to the how green belt can offer infrastructure improvements. As noted in other Topic Papers, East Renfrewshire lacks brownfield/urban land to provide this vital infrastructure, green belt land can provide this space in a sustainable manner that connects to existing and new communities.

A robust housing land supply is required to be identified, such that the indicative Local Housing Land Requirement (iLHLR) can be met in full across the plan period. All sites that are allocated must be proven to be deliverable. Further comments in respect of this are set out in our submission regarding the draft Topic Paper 13: Housing.

ICENI on behalf of the Baird Family, Rowallandale Ltd

The Topic Paper notes that a high level assessment undertaken does not conclude whether the required quality of services or infrastructure is currently in place for communities in East Renfrewshire. Further analysis is required to properly inform decision making and prior to the Gate Check and preparation of LDP3.

Identifying gaps in service provision will be vital to determine where new development might be able to support this lack in provision to support both existing and planned new development.

Further information on the regularity of updates to the Local Living GIS toolkit by East Renfrewshire Council should be included.

East Renfrewshire Council Response

Issues with the GIS link to the interactive map have been resolved.

The Council acknowledges the use of an 800m metric is not referenced in the draft Scottish Government guidance and that flexibility will need to be applied in the application of the toolkit. The responses refer to particular services such as swimming pools, libraries, petrol stations, affordable housing and ASN schools and query their inclusion or that wider accessibility would be more appropriate. Section 3 of the Topic Paper has been updated to reflect that the 20-minute timeframe is an approximate guide and does not rigidly define or limit local living in any context or for particular services or facilities such as accessibility to certain services eg swimming pools

The Topic Paper is clear that the application of this concept will vary across different sites and will need to be adjusted to suit local circumstances and needs. The features suitable to each

community will depend on the local context, however the principle can be adjusted to include varying geographical scales from urban areas to rural communities and to reflect the challenges associated with different areas. The challenges for urban and rural areas are clearly described in the Topic paper. The Council is not of the opinion that a 20min one way journey should be set within the toolkit for rural areas. As described above there is flexibility within the toolkit to allow for application of the Local Living concept for different geographies. The Living Streets research is noted.

The response from the Baird Family, Rowallandale Ltd states that the Topic Paper does not conclude whether the required quality of services or infrastructure is currently in place. The Council acknowledges this statement and the Topic paper has been revised to reflect the data gathered through the LDP3 Place Surveys and Local Action Plans which provide additional supporting information on this matter.

The Topic Paper clearly states that the Local Living toolkit will be a key factor when developing master plans or development briefs for new sites brought forward through LDP3. This will help identify gaps in service provision. The Council acknowledges that larger master planned mixed use sites will contribute towards the creation of Local Living places and communities.

The geographical distribution of sites to meet the indicative housing land requirement will be considered through the Proposed Plan. The Evidence Report is clear that there will be a need for the release of some Green Belt land.

The Transportation Theme of the Local Living Toolkit maps access to bus stops, railway stations, strategic cycle networks and core paths. The Council agrees that further information on the frequency of services would also be helpful and will continue to work with SPT to provide this additional analysis.

Marketability and deliverability of sites will be considered through the site assessment framework.

The Council will seek to review the data, themes, indicators and map annually to ensure it remains accurate and up-to-date.

Gate Check

The Council is of the view that there are no areas of dispute to be considered at Gate Check for this topic.

<p>East Renfrewshire LDP3 Issue Topic Paper 013 – Housing SD 004 - East Renfrewshire Housing Land Monitoring Report 2023</p>	<p>NPF4 - Liveable Places Policy 16: Quality Homes</p>
<p>Information required by the Act regarding the issue addressed in this section</p>	<p><u>2019 Planning (Scotland) Act</u></p> <p>Section 15(5):</p> <ul style="list-style-type: none"> • The housing needs of the population of the area, including in particular, the needs of persons undertaking further and higher education, older people and disabled people; the availability of land in the district for housing, (including for older people and disabled people). <p>Section 16(2)(ab):</p> <ul style="list-style-type: none"> • In preparing the LDP the planning authority are to have regard to the list published under section 16E of persons seeking to acquire land in the authority's area for self-build housing. <p>Section 16B(3)(b)(i))</p> <ul style="list-style-type: none"> • The Evidence Report must set out a summary of the action taken by the planning authority to support and promote the construction and adaptation of housing to meet the housing needs of older people and disabled people in the authority's area, and an analysis of the extent to which the action has helped to meet those needs. <p>Regulation 9 - have regard to:</p> <ul style="list-style-type: none"> • any local housing strategy (LHS). <p>Regulation 24</p> <ul style="list-style-type: none"> • A Delivery Programme is to set out the following matters: <ul style="list-style-type: none"> ○ the expected sequencing of, and timescales for, delivery of housing on sites allocated by the LDP. <p>Other statutory requirements:</p> <ul style="list-style-type: none"> • LHS which is required by the Housing (Scotland) Act 2001, as amended, to be informed by an assessment of housing provision that is carried out by a

	Housing Need and Demand Assessment (HNDA).
Links to Evidence	<ul style="list-style-type: none"> • East Renfrewshire adopted Local Development Plan 2 (March 2022) (CD 206) • Registers of Scotland Property Market Report (CD 073) • National Planning Framework 4 (NPF4) 2023 (CD 102) • Glasgow and the Clyde Valley regional Housing Need and Demand Assessment (HNDA3) (June 2024) (CD 177) • Housing to 2040 (CD 107) • A Fairer, Greener Scotland: Programme for Government 2021-22 (CD 097) • East Renfrewshire Local Housing Strategy (2024-29) (CD 254) • East Renfrewshire Strategic Housing Investment Plan (SHIP) (2023-2028) (CD 200) • East Renfrewshire Affordable Housing Supplementary Guidance (June 2023) (CD 202) • Shared Voice Report: Housing attitudes of residents living in East Renfrewshire - Prepared on behalf of Mac Mic Group (May 2024) (CD 287) • The Diffley Partnership and Rettie & Co (on behalf of Homes for Scotland) Report (January 2024) (CD 288) • East Renfrewshire Mid-Market Rent Study (ongoing) (CD 258) • East Renfrewshire Accessible Housing Needs research Report March 2022 (ongoing) (CD 201) • East Renfrewshire HSCP Strategic Plan (2022-25) (CD 246) • East Renfrewshire HSCP Annual Performance Report 2023/24(CD 244) • EAC retirement homes & sheltered housing data (CD 015) • EAC assisted living homes & extra care housing data (CD 014) • East Renfrewshire Local Living GIS interactive online mapping toolkit (CD 255) • Scottish Care Home Census 2023 (CD 095)

- East Renfrewshire [Self-Build List Register \(CD 267\)](#)
- [MECOPP Resources](#) (CD 299)
- [East Renfrewshire Place to Grow](#) (CD 260)
- [East Renfrewshire response to MATHLR consultation \(CD 265\)](#)
- [HNDA Managers Guide \(December 2020\) \(CD 101\)](#)
- East Renfrewshire [SFRA Map \(CD 268\)](#)
- [NRS household projections 2018 \(CD 043\)](#)
- East Renfrewshire Green Belt Landscape Character Assessment (2016) (CD 243)
- [East Renfrewshire Local Living GIS interactive online mapping toolkit](#) (CD 255)
- Site Assessment Framework (SD 001)
- Housing Land Monitoring Report (SD 004)

Summary of Evidence

The Housing Topic provides an overview of:

- The Housing Need Estimates that emerged from the Glasgow City Region Housing Need and Demand Assessment 3 (HNDA3); and
- The minimum all-tenure housing land requirement (MATHLR) set via the adopted National Planning Framework 4 (NPF4); and
- How these were translated into the setting of a Housing Land Requirement (HLR) for the Proposed Plan.
- Additionally, this report provides a summary of the key issues identified for Specialised housing provision (e.g. housing designed for specific needs such as wheelchair users).

The principal purposes of the Topic Paper were to:

1. Provide an overview of the East Renfrewshire Housing Profile and demographic and social trends;
2. Outline the Policy Context;
3. Provide a summary of Housing Need and Demand, and the mix of housing across tenures required in response to this;
4. Provide a summary of the key issues identified for Specialised housing provision;
5. Establish an indicative all tenure Housing Land Requirement (HLR) for LDP3; and
6. Set out implications for LDP3.

Section 1 provides an overview of the housing profile for the East Renfrewshire area. Challenges relating to delivering sufficient good quality homes of the right type and size and tenure; delivering a greater number of good quality affordable and specialist accommodation

options, including those of older and disabled people; and providing more affordable options for people who wish to downsize; rising homelessness are described.

Population and household projections are referred to which highlight the significant change in the demographics of East Renfrewshire with an increase in the young and old population. The paper notes that these projections trends will have implications for local service provision such as health care facilities for the elderly and also housing provision.

Section 2 outlines the policy context, summarising the requirements from NPF4 and Housing to 2040. An overview of key issues identified for rural homes (NPF4 Policy 17) is included with the Green Belt and Rural areas Topic Paper.

Section 3 provides a summary of the Regional Housing Need and Demand Assessment, outlines the future housing estimates for East Renfrewshire which are shown as a requirement for 5876 new homes over the next 19 years (310 homes per year), with around 700 (37 homes per year) of these needed for social renting, and a further 600 (32 homes per year) for mid-market rent or alternative affordable housing tenures. The Paper describes the housing market area context for the Eastwood and Levern Valley areas and while the context in each varies in terms of development opportunities and profile, however there is a clear need and demand for additional affordable and market homes across both areas.

An overview is provided of the current Local Housing Strategy (2024-2029) and its strategic priorities and of the current SHIP (2023– 2028). The SHIP estimates up to 613 units of affordable housing primarily focused on new build provision of social rented housing; and at least 10% of the new affordable units as wheelchair accessible or adaptable to lifetime needs during this period could be delivered.

The Paper summarises the current approach to the provision of affordable housing and highlights the ongoing significant pressure for affordable housing throughout the Council area, particularly for social rent. To address the lack of affordable homes and in particular social rented homes as evidenced by HNDA3 It is proposed that specific sites will be required to provide 30% of new homes as affordable with 25% as social rented as 5% as intermediate tenure. A summary of the findings of the mid-market Rent study is also shown.

An overview and recommendations of the Diffley and Shared Voice Housing Reports are also set out. The implications for the East Renfrewshire Housing Land Requirement is shown under Section 5 of the Topic Paper.

Section 4 outlines the approach towards specialised provision and current and future needs, requirements. The Paper addresses issues relating to accessible and adaptable homes and refers to the conclusion reached in the wheelchair and accessible housing study. This study highlights that a target of around 30 fully wheelchair accessible homes are required per year to 2031. An overview of housing for the elderly is given and details of the current sheltered and care home infrastructure provided.

The Paper summarises the approach towards self-build housing and registrations and any requirements for the Gypsy and Traveller Communities.

Section 5 explains the methodology and justification for calculating an Indicative All Tenure Housing Land Requirement (HLR) for the Proposed Plan and what has been considered. In setting the indicative HLR the following factors were considered:

- a) HNDA3 Housing Need Estimates;
- b) The MATHLR included in the adopted NPF4, and the evidence used to inform this requirement at draft NPF4 stage;
- c) LHS Housing Supply Targets;
- d) The Council's Vision for the Future documents;
- e) Monitoring of the 2023 Housing Land Supply as evidenced through the Housing Land Monitoring Report;
- f) Infrastructure Capacity as evidenced through separate LDP3 Topic Papers;
- g) Performance of the spatial strategies and housing delivery of LDP1 and LDP2; and
- h) Other housing studies – Diffley and Shared Voice Reports are discussed.

The Paper states that to provide a HLR over a 10-year period 2026 to 2036 and based on the outcome of the analysis in the report it is estimated that a HLR of **3100** homes be set for this period. This equates to 310 homes per annum, though delivery is unlikely to be evenly spread each year.

The analysis in the report clearly shows that there is a shortfall in the current housing land supply against the MATHLR and the indicative LDP3 HLR and on this basis additional land will need to be identified through the Proposed Plan stage.

Section 6 sets out implications for LDP3 which are set out below.

The LDP3 Evidence Report SEA Scoping Report (April 2024) defines the scope/level of detail to be covered in the Environmental Report for the Proposed Plan. Section 4 provides an overview of the environmental characteristics of East Renfrewshire. Table 2 sets out the SEA objectives relating to each SEA theme which includes a section on housing within the landscape and population and place themes.

Summary of Stakeholder Engagement

Section 4 'Engagement Statement' of the Evidence Report summarises the various engagement and consultation activities that have been undertaken to inform the Evidence Report. This includes collaborative working with Key Agencies and other stakeholders in the preparation of Topic Papers and the Play Sufficiency Assessment, and other place-based engagement and workshops.

A series of Topic Papers were prepared structured around the sustainable, liveable and productive places themes of National Planning Framework 4.

Wider external engagement with stakeholders commenced on 12th April and ended on 10th May 2024, inviting people interested in LDP3 to review the Topic Papers that cover their areas of interest and to share their comments. The aim of the engagement was to establish areas of agreement or disagreement and any additional evidence that should be taken into account.

The Topic Papers were published on the Council's Local Development Plan Hub on Commonplace, and through the Council's LDP3 website, Facebook and Twitter account and email notifications were sent to individuals and organisations listed on the LDP contact database.

The SEA Scoping Report was submitted to the SEA Gateway consultation authorities on 19th April for a 6-week consultation period. The Gateway Authorities were generally supportive of the

Scoping Report subject to a few points for consideration for the Environmental Report to be prepared alongside the Proposed Plan. Comments are summarised in Section 4 Table 1 of the Evidence Report.

Summary of Implications for the Proposed Plan

The Topic Paper sets out the implications for LDP3 in delivering the indicative HLR. These recommendations have been informed by the analysis and outputs in this report. This topic paper is robust and supported by evidence and reflects the wider Infrastructure considerations addressed in separate topic reports.

The Proposed Plan will set out a strategy to address the housing and infrastructure issues identified through this and other topic papers and ensure growth is delivered under a planned and phased approach whilst directing future development away from the most sensitive and environmentally important areas of the Green Belt. LDP3 will seek to ensure that an appropriate level of housing is being planned for to meet identified needs now and in the future and align with the 3 pillars of the Council's Place to Grow strategy. This will support the sustainable development of the area and reduce risks of homelessness, unaffordability etc

Sites will require to be allocated over a range of geographies and settlements and include a range of site sizes and tenures. This needs to be accompanied by higher standards of placemaking and delivery of the infrastructure requirements to support planned growth, while recognising the competing land interests (such as commercial/leisure/community etc) for larger master planned sites as demonstrated through separate topic papers and establishing required densities as a minimum on specific sites. It is also worth noting that new growth areas will inevitably be greenfield sites as East Renfrewshire has a very limited vacant/ derelict/brownfield land supply or land of a sufficient scale within its ownership. As part of the consideration of appropriate sites for development, the Council will give consideration to the potential for a new settlement, although this will form one of a range of possible ways to meet future housing need. A new settlement would have a long lead in time and would likely only contribute to housing needs in the long term and post LDP3.

The Council will continue to explore the effectiveness of all housing sites currently included within the 2023 Housing Land Audit. This includes looking at alternative approaches to unlock sites that have been designated in several plans, including the use of compulsory purchase powers to bring sites forward. This will be informed by a Call for Sites and Ideas exercise. We will prepare a housing pipeline setting out programming of sites over the short-, medium- and longer-term periods. Only sites that are deliverable will be identified in LDP3. Sites will not automatically be rolled forward from LDP2.

The Council will continue to apply a flexible policy approach to the provision of affordable housing and work actively with developers to find and apply appropriate solutions to affordable housing delivery on a case-by-case basis. At least 25% of homes will require to be for affordable housing as set out in LDP2, and it's supporting Supplementary Guidance and NPF4 for the majority of sites. Opportunities to increase the affordable housing percentage on specific sites (likely to include an additional requirement for intermediate tenures) will also continue to be explored. This higher requirement will be clearly set out in relevant master plans or development briefs.

The plan will seek to ensure a proportion of accessible housing is provided on new developments in line with local need, and that includes a mix of housing types, sizes and tenures to cater for all

population groups, including the ageing population in accordance with the LHS and other supporting strategies. This will help to reduce inequalities faced by those with disabilities and ensures that accommodation is suitable for residents as they age. It is also with the aim of creating necessary movement within the housing market to help residents secure a suitable home for their needs over different life stages.

The Council will also continue to monitor the provision and distribution of care homes and the impact upon GP practices and HSCP accommodation, uptake of self-build registrations and any future requirements for the Gypsy and Traveller Communities.

Statements of Agreement / Dispute

Statements of Agreement

Public - David Davies

Broadly agrees with the evidence. Section 6 (of the Evidence Report) states that only sites that are deliverable will be identified in LDP3 and that sites will not automatically be rolled forward from LDP2. In respect of this statement, we would like to ensure that the site referenced as SG1.2 Chappellefield in Barrhead be brought forward as an allocated housing site for LDP3. The Evidence report states that East Renfrewshire has a very limited brownfield land supply, and this is a mixed-use site of former industrial land and wooded greenfield site. It is fully anticipated that the residential proposal for this site will include 25% affordable housing contribution. We have held discussions with Barrhead Housing Association and following this they are expecting a PAN notice to be submitted shortly. We have applied for Pre-application advice and are now awaiting a response from East Renfrewshire Council in order to progress with development of the site.

East Renfrewshire Council Response

The Council acknowledges and welcomes the supporting comment received. Site specific comments will be considered at Proposed Plan stage.

Statements of Dispute

Public

Christine Nanguy, Michelle Guthrie, John Galt, Hugh Gallagher, Peter Ballingall, Andy Martin, Donald Macvicar, Robert Milne, John Mcandrew, Cameron Mackay, Sharon Gilpin, Brian Nicol, Sharon Mcgeough, David Greenslade, Patrick McBride, Stephen Little, Andrew Whiteford, Amanda Piscitelli, Serena Manzur, Joseph Munro, James Graham Paton, Kara Philliben, Elana Scott, David Bunyan, Zoe Gillespie, Kirsty Howe, Lisa Maclachlan, Shaista Ghafoor, Dennis Bell, Manoj Bagha, Furwa Nadeem, Annemarie Dobbie, Glenn Ostler, Kathryn Buchan, Colin Sneddon, Claire Forker, Julieann Bryers, Gillian Tod, Graham Smith, Sergey Throshyn, Charlie Wallace, Kirsty Odonnell, Stephen Lynch, George Matheson, Andrew Jardine, Nichola Maclean, Ryan Mcpherson, Mary Leonard

The following comments were submitted via the Shared Voice Report:

- Need to prioritise building more homes of all types in East Renfrewshire in the new Local Development Plan (LDP3).
- Not enough homes for local people.

- There is a lack of affordable, quality homes.
- There is a significant need for a broader range of housing types, not just the typical large detached houses that have become too common.
- There is a need for more semi-detached homes, bungalows, and other smaller options that can accommodate various lifestyles and stages.
- It is nearly impossible for the younger generation and families to live in the area.
- The demand for larger, family-appropriate homes continues to grow - noticeable lack of three-bedroom homes available.
- There is a need for more housing developments focused on rental properties.
- There is a need for suitable housing options like bungalows for aging relatives.
- There should be a focus on increasing housing stock but also on making these homes accessible and maintaining them properly to support a growing community.
- There is a need to accommodate our growing population but also to support the burgeoning industrial sector.
- New developments need to include the necessary infrastructure such as roads, improved transport infrastructure like rail links, schools, nurseries, shops, and healthcare/medical facilities to support our growing community.
- All new development should consider proper access to recreational facilities. We do need more housing and we need to make sure that community spaces like sports fields remain open and accessible. Promoting an active lifestyle among residents is important.

Scottish Water

Recommended revised wording for Section 5-part (f) Water Management.

Homes for Scotland, Miller Homes, ICENI on behalf of East Renfrewshire Home Builder Consortium (Mac Mic Group; Miller Homes; Robertson Homes; Taylor Wimpey), ICENI on behalf of The Mac Mic Group, Cala Management Ltd (CALA), Robertson Residential Group, Barratt Homes West Scotland & David Wilson Homes West Scotland (Barratt), Taylor Wimpey, ICENI on behalf of The Baird Family

HFS and other responses agree that the housing market, high house prices, access to affordable homes and homelessness issues should be given significant weight in setting the indicative housing land requirement (IHLR) and that there is a need to release further parts of the green belt to meet development requirements for housing.

Responses state that the Council must be ambitious in setting housing targets which will also create socio-economic benefits for East Renfrewshire. It is stated that affordability pressures will continue to be exacerbated if supply levels do not improve. The Council have failed to fully consider the increasing population and apparent housing pressures when attempting to be ambitious in their housing land requirements.

No mention is made of the Scottish Government declaring a climate emergency or that housing is now a 'national outcome'.

HFS state that NPF4 does not indicate the need for a minimum of 25% affordable housing. Rather NPF4 states that development proposals for new homes will be supported where they make provision for affordable homes to meet an identified need. Proposals for market homes are to be supported where the contribution to the provision of affordable homes on a site will be "at least 25% of the total number of homes, unless the LDP sets out locations or circumstances where: i. a

higher contribution is justified by evidence of need, or ii. a lower contribution is justified, for example, by evidence of impact on viability". It is clear that the flexibility lies with the Council to set an affordable housing requirement either above or below 25%, dependent upon local factors. However, it is acknowledged that the Council note the importance of viability in considering an affordable housing requirement.

Responses state that it is positive that the Council has considered the need for flexibility in such a policy, and that the provision of intermediate tenures could be considered. This reflects the identified need and demand for other affordable options to be made available, such as mid-market rent and homes for discounted market sale, whilst continuing to address the acute need for social rented homes.

HFS and other responses raise significant concerns regarding the Council's decision to give no regard to the work into existing housing need carried out on behalf of HFS (Diffley Partnership/ Rettie report). HFS state that the work undertaken by HFS has not been considered, despite being submitted to the Council in advance of this consultation period (**their view**). They state that this additional evidence is required to be reflected in the Evidence Report. ICENI on behalf of The Mac Mic Group also submitted a report prepared by Shared Voice which outlines 'Housing attitudes of residents living in East Renfrewshire (May 2024). It is stated that the Evidence Report must set out a transparent and understandable explanation of how the iHLR has been arrived at and that this figure must exceed the NPF4 MATHLR.

Responses state that the MATHLR figure contained in the revised NPF4 draft is unacceptably low and sets a poor baseline for the delivery of homes moving forward. The MATHLR sets out reduced levels of home building in comparison to the last 10 years.

Mac Mic Group state that the benefit of mixed-use sites is not recognised.

The responses state that the Council's view is that meeting (not even seeking to exceed) the default Minimum All-Tenure Housing Land Requirement (MATHLR) would result in development being directed to the green belt and suburbs and away from brownfield urban areas and away from existing local services and existing infrastructure, and that this would thereby be "contrary to NPF4 climate change, biodiversity, brownfield and Local Living objectives." To confirm, not meeting / exceeding the MATHLR would be significantly contrary to NPF4 Policy 16.

The emerging housing crisis requires to be given significant weight. Furthermore, HFS believes that the MATHLR figure contained in the revised NPF4 draft is unacceptably low and sets a poor baseline for the delivery of homes moving forward. The MATHLR is 2,800 units over ten years.

The responses refer to the shortfall in the land supply and that the current land supply is not sufficient to meet the 10-year MATHLR. HFS agree that a shift in spatial strategy to resolve this shortfall is required. It is stated that private sector completions remain strong, particularly in the Eastwood sub area.

HFS also disputes that Council's assertion that, based upon an iHLR of 3100 homes over a 10-year period, the Proposed Plan would need to identify land to provide an additional 1874 homes to meet in full the HLR. This approach appears to automatically assume every currently allocated site will be rolled over into the next Plan. This is incorrect. All currently allocated sites (that do not benefit from an extant consent) must be reassessed.

HFS state that the current HNDA process and toolkit are fundamentally flawed and significantly underestimate the true need and demand for housing. This is primarily due to it taking a very limited view of what constitutes existing need and demand. A robust approach to the HNDA

process must include undertaking primary research to identify actual household groups in need and in-depth analysis of the existing housing stock in terms of its energy efficiency and quality. It should also undertake research on affordability pressures, ambitions for demographic change, and economic growth.

The Diffley Report finds that there are 9,000 households in East Renfrewshire with unmet housing needs. As identified, when accounting for those who can make in-situ repairs, this reduces the overall need figure to around 7,900 households.

The HFS response sets out a revised MATHLR calculation based upon the NPF4 methodology and using the Diffley data. This results in a 10-year MATHLR of 13,834 - a difference of 11,034 from the NPF4 figure.

The Shared Voice Report sets out the following recommendations:

1. East Renfrewshire Council should establish a credible and robust Housing Land Requirement that exceeds the MATHLR and addresses the stark findings of local housing need contained within this report
2. East Renfrewshire Council should hold consultation workshops with young people and renters - the groups that face the highest levels of housing need but who are universally unheard in Local Plan and formal planning consultations.
3. The East Renfrewshire Local Plan should incorporate a powerful strategy to support all types of housing including affordable - to help residents find quality housing that meets their needs.

The report states that respondents want the council to prioritise building more homes of all types in the Local Development Plan to...

- provide affordable housing
- address the local housing shortage
- support the younger generation onto the property ladder
- allow existing residents to stay in the area
- allow older residents the opportunity to downsize
- provide economic and community benefits

Site specific comments were also highlighted in a number of responses.

Public - James Stuart MacGarvie

The reduction in housing numbers to 2,800 completely disregards the emergency that is the housing crisis. With a change in political circumstances whereby the economy is purported to now be a priority, surely housing numbers will require to be increased to beyond the original level of 4050. This is a pragmatic and sensible solution to a housing crisis for all sectors, including the delivery of affordable housing.

Eaglesham can accommodate housing releases which comply with sustainable development and within the 20 min travel isochrones to services. The infrastructure is in place to facilitate housing releases, notably affordable and special needs housing, key workers and family homes.

East Renfrewshire Council Response

Revised wording as requested by Scottish Water has been included under Section 5-part (f) Water Management.

Homes for Scotland (HFS) and other responses from its members have disputed the Council's approach to setting the indicative Housing Land Requirement (HLR). The Council strongly disagrees with these comments. Section 5 of the Topic paper sets out a clear and transparent approach to the methodology and what has been considered. The indicative HLR has been set at a level 11% greater than the NPF4 MATHLR. The Councils approach accords with the LDP Guidance and NPF4.

Section 5 part (b) of the topic paper explains the Council's approach in setting the indicative HLR and refers to the consultation and joint approach that was taken by the Clydeplan local authorities when reviewing the draft MATHLR, and that the approach undertaken by the Scottish Government did not reflect the operation of the wider housing market across the region. As explained in the topic paper a consistent criteria-based analysis was undertaken with reapportionment of the Clydeplan total figures to reflect the movement of mobile demand. This process resulted in a reduction of the MATHLR for East Renfrewshire from 4050 to 2800 (including 25% flexibility allowance). HFS queried this analysis and the conclusion that meeting this draft requirement would result in development being directed to Green Belt locations. The Council's analysis highlighted that this higher figure would be extremely difficult to achieve. The Scottish Government accepted the Council's response and the reduced MATHLR of 2800 was reflected in the adopted NPF4. The Council also clearly acknowledge through this and other topic papers that Green Belt releases will be required to meet the indicative HLR. HFS have supported this position.

The Council acknowledges that the LDP guidance (pg 63) states that where more recent evidence is available this should be used as it enables the Evidence Report to be more up to date. HFS and other responses refer to a report by the Diffley Partnership / Rettie (2024) as evidence which needs to be considered reflecting the most up to date data. Mac Mic Group also provided a Shared Voice report which explores the current housing situation and housing challenges faced by local people. In line with the local development plan guidance, HFS state this more recent evidence should be used as it postdates the 2023 regional HNDA.

The Council is disappointed that the HFS response infers that the Diffley Partnership / Rettie report has been ignored and, in their words, this is 'alarming'. The Council would state that it only received the report from HFS during the engagement process, not the 5th of April as indicated by HFS, and therefore only after the Topic Papers had been drafted and published for engagement. The Council met with HFS and 3 of their members at a meeting on the morning of the 9th May and explained that no report had been received, yet the response unhelpfully continues to refer to this earlier date and the Council's perceived lack of analysis.

The Council acknowledges the findings and recommendations of these additional studies, however, the HNDA is a recognised Scottish Government housing tool and combined with the Scottish Governments MATHLR provides the evidence base for the LDP and the Council's Local Housing Strategy. The Council disagrees with HFS assumption that the HNDA model is flawed. The three Housing Need and Demand Assessments (HNDAs) undertaken for the Glasgow and Clyde Valley Region have informed previous Structure/Strategic Development Plans and each Local Authority LDPs and on each occasion been signed off as robust and credible by the Scottish Governments Centre for Housing Market Analysis (CHMA). A summary of the Diffley and Shared Voice reports has been added to the topic paper and an additional section on the results of these studies has been included in the setting the HLR methodology section.

The Council has had no involvement in developing the Diffley Partnership / Rettie report and it is not a recognised evidence source identified within the LDP Guidance, unlike the HNDA. The small sample size '197' residents or 1.44% of the total national figure of 13,690 people, also raises questions over the robustness of the findings at the local level. The outcomes from this report combined with the response from HFS demonstrate a revised MATHLR figure of 13,834 for East Renfrewshire, which is 11,034 or 5 times greater than the figure included in the adopted NPF4 of 2800. Although some of this requirement could be provided by non-new build options the majority would remain to be delivered from new sites. This revised MATHLR would require completions of approx. 1380 per annum or the equivalent of a Maidenhill masterplan sized development each year for 10 years. When compared to the current build rate of 329 per annum over the previous 10 years this figure is unrealistic and unachievable when lead in times, infrastructure, funding and other constraints are also factored in. The Council also has reservations that there would be capacity within the development industry to deliver this level of development per annum. In addition, this revised MATHLR is only a minimum figure and if the Council accepted this MATHLR the indicative HLR would be required to be greater still. For example, a further 10% increase would result in an indicative HLR of 15,217 homes over a 10-year period. The Council retains the view that the indicative HLR of 3100 homes set out in the topic paper is ambitious and realistic.

Although we disagree with the overall level of need identified, one of the key findings is that there is a strong need for increased affordable housing delivery, which aligns with the Councils aspirations. In addition, this may suggest that the development industry should provide a greater housing mix with a focus on the provision of smaller properties to meet wider housing needs.

Responses state that the Council has not considered the increasing population figures within its assessment. The HNDA factors in housing projections based upon the 2018 NRS projections. The Council has also compared the 10-year 2018 NRS projections with the indicative HLR as set out in Table 3 of the Topic Paper.

The Council agrees with HFS that a change in strategy is required for LDP3, but would reiterative that while the HLR needs to reflect the current aspirations of the Council and the strategic objectives of NPF4 for meeting housing and infrastructure needs and growing the local economy, it must also reflect what can realistically be delivered considering environmental, infrastructure and funding considerations and the timing for both.

The Topic Paper clearly acknowledges the housing issues and challenges faced in the area, which includes affordable housing, meeting the needs of the elderly population, addressing homelessness, downsizing opportunities and acknowledges the joint working required between the Councils Housing and the East Renfrewshire HSCP services to try and address these wider issues. These matters have been given significant weight in setting the indicative HLR.

The Council generally agrees with the issues raised and the recommendations set out in the Shared Voice Report and notes the responses received from the public. An ambitious indicative HLR has been established to meet the housing requirements set out in the HNDA. Although this is significantly lower than the findings of the Diffley report it is considered realistic and achievable. LDP2 and its supporting supplementary guidance and the Local Housing Strategy provide a clear and robust framework for considering affordable housing options and requirements and has been shown to be an effective tool in delivering increasing numbers of affordable homes. The LDP and LHS also have a focus on meeting the needs of our elderly population. The Council agrees that workshops with young people could be undertaken to inform the LHS and LDP process. Furthermore, the Council agrees with the list of housing outcomes from building more homes.

Each of the outcomes are acknowledged in the housing and other topic papers and within the LHS.

It is queried that the Councils approach does not meet National Outcome 6 which refers to meeting the housing needs of people living in Scotland, in particular the housing needs for older people and disabled people. The Council's approach is clear that it will aim to meet the requirements set out in the regional HNDA and deliver wider housing objectives through partnership working through the Local Housing Strategy and HSCP strategies.

The Council acknowledge that the Scottish Government has declared a housing emergency, but this alone does not support the case for significantly increasing the East Renfrewshire HLR. To acknowledge this issue a reference to the national housing emergency has been added to the topic paper.

The Council acknowledges that Policy 16 of NPF4 refers to 'Proposals for market homes are to be supported where the contribution to the provision of affordable homes on a site will be at least 25% of the total number of homes, unless the LDP sets out locations or circumstances where a higher or lower contribution is required'. The Council will amend the wording in the topic paper accordingly.

HFS state that NPF4 does not indicate the need for a minimum of 25% affordable housing. Rather NPF4 states that development proposals for new homes will be supported where they make provision for affordable homes to meet an identified need. Proposals for market homes are to be supported where the contribution to the provision of affordable homes on a site will be "at least 25% of the total number of homes, unless the LDP sets out locations or circumstances.

HFS query that the topic paper assumes that all sites will roll forward and contribute towards meeting the shortfall against the indicative HLR. Section 7 of the topic paper 'Implications for LDP3' clearly states that the Council will continue to explore the effectiveness and deliverability of all housing sites currently included within the 2023 Housing Land Audit. The Site assessment framework also reaffirms the LDP guidance requirement that no sites will automatically roll forward from the current adopted LDP2, a position supported by HFS and their members' comments to this document. The acknowledged shortfall in the land supply will be met by existing sites and the identification of new sites through LDP3.

The Council acknowledges in the topic paper that mixed use master plan sites will be required for LDP3.

Site specific comments will be considered at Proposed Plan stage.

2023 Housing Land Audit - The programming within the 2023 Housing Land Audit was discussed and largely agreed with HFS. HFS did not formally dispute any of the sites, however they queried the programming on 2 sites:

- ERRF0539 - GLEN ST/WALTON STREET, Barrhead
- ER0067 - ROBSLEE DRIVE, Giffnock

Gate Check

Given the significant difference in the indicative HLR prepared by the Council and Homes for Scotland revised figures, it is clear that no agreement has been reached, and this matter remains an outstanding area of dispute.

<p>East Renfrewshire LDP3 Issue Topic Paper 014 – Infrastructure First</p>	<p>NPF4 - Liveable Places Policy 18: Infrastructure First</p>
<p>Information required by the Act regarding the issue addressed in this section</p>	<p><u>2019 Planning (Scotland) Act</u></p> <p>Section 15(5):</p> <ul style="list-style-type: none"> • the infrastructure of the district (including communications, transport and drainage systems, systems for the supply of water and energy, and health care and education facilities); • how that infrastructure is used; • the education needs of the population of the district; and • the capacity of education services in the district. <p>Regulation 9 - have regard to:</p> <ul style="list-style-type: none"> • the national waste management plan; • any regional transport strategy; and • any local transport strategy.
<p>Links to Evidence</p>	<ul style="list-style-type: none"> • National Planning Framework 4 (NPF4) 2023 (CD 102) • East Renfrewshire adopted Local Development Plan 2 (March 2022) (CD 206) • East Renfrewshire Council SCVO Funding Finder (CD 225) • East Renfrewshire Development Contributions Supplementary Guidance (June 2023) (CD 203) • Circular 3/2012 'Planning Obligations and Good Neighbour Agreements (CD 010) • East Renfrewshire City Deal (CD 215) • Scottish Government's Infrastructure Investment Plan Progress Report (CD 123) • Scottish Government Infrastructure Investment Plan (IIP) (2021-26) (CD 110) • East Renfrewshire Corporate Asset Management Plan (CAMP) (CD 221) • East Renfrewshire Property Asset Management Plan (PAMP) (CD 262) • East Renfrewshire Roads Asset Management Plan (RAMP) 2024 (CD 266)

- East Renfrewshire [Fleet Asset Management Plan 2023-2028 \(CD 237\)](#)
- East Renfrewshire [Open Spaces Asset Management Plan \(OSAMP\) \(CD 259\)](#)
- East Renfrewshire [SFRA Map](#) (CD 268)
- [East Renfrewshire Capital Investment Strategy \(2023\) \(CD 211\)](#)
- [East Renfrewshire General Fund Capital Plan \(2023\) \(CD 239\)](#)
- Scottish Government [Place based Investment Programme \(PBIP\) \(CD 113\)](#)
- [UK shared prosperity fund \(UKSPF\) \(CD 164\)](#)
- [East Renfrewshire Renewable Energy Fund \(ERREF\) \(CD 263\)](#)
- East Renfrewshire [Strategic Housing Investment Plan \(SHIP\) \(2023-2028\) \(CD 200\)](#)
- Site Assessment Framework (SD 001)

Summary of Evidence

The purpose of this Topic Paper is to provide an evidence-based assessment of existing infrastructure provision and to identify future infrastructure requirements to support new development over the plan period and beyond. It identifies key bodies with responsibility for delivering infrastructure and provides an overview of finance and funding opportunities. The Topic Paper is supported by a series of other Papers which outline the infrastructure evidence base for other topics. The infrastructure evidence base will continue to be reviewed over time through the LDP3 Delivery Programme, the Development Contributions Supplementary Guidance (June 2022) and updated LDP Evidence Reports.

The provision of functional, serviceable, safe and maintainable infrastructure, to support East Renfrewshire’s growing and ageing population and address the impacts of future growth and development, is a key element in delivering successful sustainable communities. Across the Council area there are networks of existing infrastructure which are important to safeguard, maintain and where necessary improve. Infrastructure considerations should be at the heart of planning and place making. Plans, strategies and delivery programmes should promote a more sustainable use of infrastructure, making better use of existing assets and prioritising low carbon infrastructure.

The LDP needs to reflect the current aspirations of the Council for meeting housing and infrastructure needs and growing the local economy. It must also reflect what can realistically be delivered, taking into account infrastructure and funding considerations and the timing for both.

The purpose of this report is to set out the infrastructure that will be required to deliver the planned level of growth over the next 10 years and beyond.

Section 1 outlines the Policy Context which includes NPF4 and the adopted East Renfrewshire LDP2.

Section 2 identifies key bodies with responsibility for delivering infrastructure and partnership working. The Planning Service has engaged with other Council services, statutory consultees and external infrastructure providers to assess the current infrastructure evidence base, including identifying potential gaps and limitations; to understand constraints from their perspective; and the extent to which any constraints will have implications for future growth in the area.

Section 3 provides an overview of Finance and Funding opportunities. These sources are summarised under Appendix A of the Topic Paper. There is a wide range of potential sources of funding for the provision of infrastructure. The role and relative contribution of these sources vary through time, according to national economic circumstances, government policy, and as new mechanisms are introduced, and older ones phased out.

The Topic Paper provides an overview of the Council's planning obligations policy and supporting supplementary guidance. Since the adoption of LDP1 in June 2015, the Council has received over £19.4million in development contributions for infrastructure and service capacity enhancements to mitigate the impact of new development. Of that total the Council has spent over £9.8million on infrastructure capacity enhancements.

An overview of the City Deal project and individual projects is also set out.

Section 4 provides an overview of the national, regional and sub-regional infrastructure that will support growth across Scotland, the wider Glasgow region as well as in East Renfrewshire. This includes an overview of future regional working through a Regional Spatial Strategy and projects to be delivered via the Scottish Governments Infrastructure investment Plan are highlighted.

Section 5 provides an overview of the Council's Asset Management Plans. Asset management ensures that assets are administered in the best way to meet the needs of the organisation and ensure the delivery of its corporate goals and objectives. Further information is set out in Appendix B of the Topic Paper.

Section 6 outlines the current baseline of provision in relation to physical and social infrastructure types to inform and determine infrastructure need across the area to support planned growth. Table 1 summarises key infrastructure types that are considered critical to the delivery of growth. This includes Education, Health, Transport, Flooding and Water management, Communications and Digital, and Energy Generation and Distribution infrastructure. This section also refers to the importance of integrating green and blue infrastructure and the provision of neighbourhood centres and community and leisure facilities. Other key infrastructure requirements highlighted include: Faith Facilities and Infrastructure including burial grounds and capacity; and the provision of a new Council Depot.

The Topic Paper clearly states that once there is greater certainty over the spatial distribution of planned growth, further detailed analysis and modelling will be required in order to project the anticipated impact of new residential and other land use proposals upon infrastructure and services.

Section 7 sets out the implications for LDP3, which have been informed by the analysis and outputs in the report.

Appendix A: summarises sources of funding.

Appendix B summarises the Council's Asset Management Plans.

The LDP3 Evidence Report SEA Scoping Report (April 2024) defines the scope/level of detail to be covered in the Environmental Report for the Proposed Plan. Section 4 provides an overview of the environmental characteristics of East Renfrewshire. Table 2 sets out the SEA objectives relating to each SEA theme. Infrastructure considerations are a common theme that runs throughout many of the SEA themes.

The national waste management plan is discussed under the Topic Paper 9: Zero Waste with the regional transport strategy and the local transport strategy discussed under Topic Paper 10: Transport.

Summary of Stakeholder Engagement

Section 4 'Engagement Statement' of the Evidence Report summarises the various engagement and consultation activities that have been undertaken to inform the Evidence Report. This includes collaborative working with Key Agencies and other stakeholders in the preparation of Topic Papers and the Play Sufficiency Assessment, and other place-based engagement and workshops.

A series of Topic Papers were prepared structured around the sustainable, liveable and productive places themes of National Planning Framework 4.

Wider external engagement with stakeholders commenced on 12th April and ended on 10th May 2024, inviting people interested in LDP3 to review the Topic Papers that cover their areas of interest and to share their comments. The aim of the engagement was to establish areas of agreement or disagreement and any additional evidence that should be taken into account.

The Topic Papers were published on the Council's Local Development Plan Hub on Commonplace, and through the Council's LDP3 website, Facebook and Twitter account and email notifications were sent to individuals and organisations listed on the LDP contact database.

The SEA Scoping Report was submitted to the SEA Gateway consultation authorities on 19th April for a 6-week consultation period. The Gateway Authorities were generally supportive of the Scoping Report subject to a few points for consideration for the Environmental Report to be prepared alongside the Proposed Plan. Comments are summarised in Section 4 Table 1 of the Evidence Report.

Summary of Implications for the Proposed Plan

The Proposed Plan will set out a strategy to address the infrastructure issues identified through this and other topic papers and ensure growth is delivered under a planned and phased approach. This report identifies areas of infrastructure where capacity issues have been identified or are anticipated.

The Council is a direct provider of some of this infrastructure and will identify requirements arising from any planned growth and seek to ensure the earliest provision to address such requirements. Given existing capacity pressures, it is essential that the required education infrastructure solutions are secured and delivered prior to development coming forward.

Initial discussions have taken place with a range of key infrastructure and service providers. It is important to note that these discussions have not identified any significant locational issues that might prevent specific spatial options being considered at the Proposed Plan stage, although education constraints in some areas remain a constraint to further growth. However, it has become clear from these initial discussions that until the LDP growth options are fully quantified through the Proposed Plan, it is very difficult for the service and infrastructure providers to provide more specific responses. Planning for infrastructure should be a continuous process and that information on infrastructure requirements and delivery will change over the course of preparing the LDP and its supporting Delivery Programme. The Delivery Programme will be a 'live' document that will be updated at appropriate stages during the plan making process and throughout the Plan period.

Once there is greater certainty over the spatial distribution of planned growth, as evidenced through the 'Call for Sites' exercise, further detailed analysis and modelling will be required in order to project the anticipated impact of new residential and other land use proposals upon infrastructure and services. Infrastructure provision will be a key criterion within the Site Assessment Framework (SD 001).

The Council's Development Contribution guidance will be fully reviewed and updated for LDP3. This review will include an up-to-date assessment of existing infrastructure capacity and future requirements resulting from agreed development proposals in the Proposed Plan. Consideration will also be given to the thresholds and types of development to which the policy will apply.

The Council will explore opportunities for enhanced waste depot facilities to operate from whilst recognising there will be a major infrastructure challenge to accommodate an EV (Electrical Vehicle) Fleet, both in terms of space and charging infrastructure.

An understanding of the aspirations of faith communities and how they will change in the future and the ongoing need for spiritual, education and cultural space for religious groups should be considered through LDP3. This could be achieved through identification of land through master plans and Council asset reviews of existing buildings or land. Planning for the future availability of Cemetery space through LDP3 and future plans is also essential to allow the Council to meet its legislative requirements.

A mixture of solutions may be utilised to address infrastructure requirements including optimising the use of current assets as outlined in the Property Estate and Accommodation Strategies.

Statements of Agreement / Dispute

Statements of Agreement

Scottish Water

Supportive of the objectives to move to an "infrastructure first" approach to enable development. However, there must be a balance of delivering infrastructure just ahead of need and ensuring this represents good value for investment of public funds, in order to guard against the risk of stranded assets where growth is not realised.

Infrastructure first needs to have a clear focus on early planning of blue-green infrastructure at a strategic level. This then needs to feed through into local development plans and master plans.

Clear guidance is required on how this can all be delivered as well as clearer emphasis on integrated blue and green approaches as they appear in the paper separately.

The plan-led system needs to ensure that, for any sites that are allocated, it is already known that water and drainage capacity is available. It is also important that programming the sites ties in with when infrastructure can be provided.

A place-based approach to infrastructure first will be crucial to the management of surface water and delivery of blue-green infrastructure at local and catchment scale. Considering blue-green infrastructure needs at an individual site level, as part of development planning, is often too late in the process and makes it much harder to deliver a catchment approach.

There is a need for clarity on whether the infrastructure first approach applies to new development only as there is insufficient focus on blue-green infrastructure within existing places/redevelopments and the requirement to retrofit.

This policy should apply to all development i.e., anywhere where planning is required. This would align with Scottish Water's storm water and surface water policies and our ambitions on net-zero and sustainable drainage systems to tackle the impacts of climate change.

Transport Scotland

Transport Scotland is content with the evidence. It is noted that it links closely to the Transport Topic Paper which provides significant information on transport infrastructure. The Council's commitment on page 17 to undertake a proportionate transport appraisal is welcomed. We look forward to continued engagement as the LDP progresses.

Strathclyde Partnership for Transport (SPT)

Broadly agree with the evidence presented.

Homes for Scotland, ICENI On behalf of East Renfrewshire Home Builder Consortium (Mac Mic Group; Miller Homes; Robertson Homes; Taylor Wimpey), ICENI on behalf of The Mac Mic Group, Miller Homes, Taylor Wimpey

Broadly agree with the evidence. They state it is correct to recognise the contribution that developers, such as home builders, make through developer contributions to delivering infrastructure to offset the impact of the development. It is important however, as the topic paper states, to recognise that any developer contribution has to meet the six tests set out in NPF4 and Circular 3/2012 'Planning Obligations and Good Neighbour Agreements'.

Welcome the holistic approach to considering the cumulative effect of development and suggested approach of proportionally splitting the overall contribution between sites. Home builders can also assist in identifying alternative solutions to mitigate the impact of new development given experience of developing in other local authority areas. This will inform and influence delivery, funding and timing of infrastructure to support a future housing pipeline.

Agree that there may be "an element of public sector front funding" of infrastructure such as education provision. Depending on the intervention the associated upfront cost could make a development unviable.

East Renfrewshire Council Response

The Council acknowledges and welcomes the supporting comments received.

The Council agrees that planning obligations must be meet the 6 tests set out in NPF4 and Circular 3/2012 and recognises that viability will be a key consideration when determining the suitable level of planning obligations. However, Council policy is clear that the financial implications of the Council's planning obligations policy should be factored into development appraisals prior to land deals and commercial decisions being taken.

Water and drainage capacity considerations are highlighted in the Site Assessment Framework. A Flood Risk and Drainage Assessment is identified as one of the supporting documents that will be required to support proposals submitted through the 'Call for Sites' stage.

The Council agrees that blue and green infrastructure planning should be at the outset of the design process and also undertaken at a wider regional level to ensure a coordinated approach. This matter is explored in more detail under Topic Paper 17: Blue and Green Infrastructure.

Statements of Dispute

Scottish Water

Request the following amendment be made to Table 1' Types of Infrastructure for Assessment' on pages 18-19 where it discusses Scottish Water data on potential future investment:

'It is a requirement of Scottish Water to identify and provide new strategic capacity that will meet the demand of all new housing development and the domestic requirements of commercial and industrial development forecasted by East Renfrewshire Council. Scottish Water will continue to work with the Local Authority to provide the required capacity at the Water and Wastewater Treatment Works that serve the local catchment area to meet known growth requirements, just ahead of need. Factors such as the total number of proposed developments, their scale and their distance from the Treatment Works may result in potential future growth investment being required. Where so, Scottish Water will engage with East Renfrewshire Council to gain a better understanding of the future proposed developments (scale and location) which will inform strategic plans to identify where future growth investment priorities are and support a flourishing Scotland'.

The link to the objectives and actions set out within Scotland's Flood Risk Management Strategies and Plan must be made to ensure opportunities are maximised to deliver shared outcomes.

Strathclyde Partnership for Transport (SPT)

Table 1: Type of Infrastructure for Assessment - Transport: - In line with the Transport topic paper, this section should refer to the travel hierarchy and the Sustainable Investment Hierarchy. The line - *"It is important that the strategic transport network has the capacity to cope with any increase in traffic levels over the life of the LDP."* – is at odds with this position. This does not reflect national and regional policy positions seeking to reduce traffic level overall, reducing the need to travel overall.

Homes for Scotland

As noted in HFSs response to the Health and Wellbeing Topic Paper consideration as to whether healthcare contributions actually meet the tests within NPF4 and Circular 3/2012 'Planning

Obligations and Good Neighbour Agreements' requires to be undertaken. This is in light of contributions having previously been sought and not meeting the tests. The Council's attention is specifically directed towards appeal decision POA-110-2015 when considering whether a developer contribution towards healthcare is required. The outcome of this decision has resulted in a further five contributions either being reduced, returned or the obligation discharged.

It is important that the Council applies a cohort progression model to forecasting school rolls. This model has been supported at appeal (Appeal Ref: PPA-150-2010) and will ensure that school roll forecasting complies with the five tests within NPF4 Policy 18 – Infrastructure first.

In order to ensure that education capacity is not a constraint to development a sequential approach to overcoming constraints should be utilised. Only if these steps are not achievable then consideration will be given to mitigation through a new school.

ICENI On behalf of East Renfrewshire Home Builder Consortium (Mac Mic Group; Miller Homes; Robertson Homes; Taylor Wimpey), ICENI on behalf of The Mac Mic Group, Miller Homes, Taylor Wimpey

The Topic Paper notes that "There will be increased reliance on the development industry to deliver or contribute to infrastructure, required as a result of new development."

The response acknowledges that the Council's Development Contribution guidance will be fully reviewed and updated for LDP3. However, the ability for new development to fund infrastructure should also be subject to viability testing. There should not be an expectation that all new development can viably deliver or contribute towards infrastructure, particularly without a holistic view of existing infrastructure capacity pressures and the potential financial burden this may place upon developers.

Determination of HLA and the impact of service strain on new and existing residential development should be anticipated.

ICENI on behalf of the Baird Family, Rowallandale Ltd

There is an opportunity for infrastructure requirements and provision to be dealt with in a more joined up approach, ensuring that locational needs are understood and will not deter new residential development from being delivered.

It is agreed that the Proposed Plan should set out a strategy to address the infrastructure issues identified through the evidence gathering stage of the plan preparation process to provide some certainty and guidance on what will be expected from developers.

The Topic Paper states "Infrastructure requirements with existing capacity pressures, such as education infrastructure, will have solutions sought to be secured and delivered prior to development coming forward." The Council should be aware that a requirement for infrastructure solutions to be sought to be secured and delivered prior to development coming forward may not always be feasible and should be subject to negotiation with developers.

It is supported that planning for infrastructure will be continuous and implemented under a planned and phased approach which will aid in the delivery of master planned schemes.

The Topic Paper notes that "There will be increased reliance on the development industry to deliver or contribute to infrastructure.....of new residential development."

The updating of SG guidance is acknowledged. However, the ability for new development to fund infrastructure should also be subject to viability testing. There should not be an expectation that all new development can viably deliver or contribute towards infrastructure, particularly without a holistic view of existing infrastructure capacity pressures and the potential financial burden this may place upon developers.

It is understood that further analysis and modelling will be required in order to project the anticipated impact of new residential development. This information is vital to the strategic planning and designation of land for new homes and to provide guidance to developers on local requirements and what infrastructure might be required to help make residential development acceptable.

Rowallandale Ltd stated that it is welcomed that the Council recognise the importance of planning for religious groups. This must be undertaken as part of creating a fair and inclusive planning system, consistent with the requirements of the Equality Act and protected characteristics which includes religion or belief. It is considered that the Council should include the review of green belt in their review of land.

NHS Greater Glasgow & Clyde

NHSGGC agrees with NPF4 'infrastructure first' approach to planning and would like to see further recognition that health and social care facilities are regarded as essential infrastructure required by communities similar to water, energy, education and transport. NHSGGC also highlights the limitations to funding new facilities. Indeed, the Scottish Government announced in January 2024 that all significant NHS building projects in Scotland will be put on hold until 2026 at the earliest due to a challenging funding position.

The only funding that could be made available to improve/increase facilities in areas of new housing development would need to come from developer contributions and/or sale of NHS land. The use of developer contributions to mitigate the impact of new development and requirement for additional healthcare facilities is established in planning legislation and guidance.

Healthcare infrastructure across NHSGGC includes properties around the Board that provide primary healthcare services (including GPs, dentists, optometry, pharmacies), other community healthcare services (including mental health, addiction and sexual health services), and acute and specialist healthcare services (hospitals). Therefore, the focus is not simply on GP's and is much wider.

Consideration is being given to the co-location of healthcare facilities with other community facilities such as community centres, sports and leisure centres, libraries etc.

Consideration is also being given to the location of healthcare facilities in relation to town centres and mobility hubs to reduce the need to travel unsustainably.

East Renfrewshire Council Response

The amendment proposed by Scottish Water has been incorporated into the Topic Paper as requested. The 'Infrastructure First Topic Paper' cross refers to Topic Paper 019: SFRA and Water

Management within Table 1. This topic paper explains the importance of Scotland's Flood Risk Management Strategies.

The Transport section of Table 1 has been revised to reflect comments by SPT with reference to the sustainable travel hierarchy and sustainable investment hierarchy added.

Homes for Scotland's disagreement with the principle of charging the housebuilding industry for the provision of healthcare facilities is noted. Policy 18 of NPF4 states that the impacts of development proposals on infrastructure should be mitigated and that development proposals will only be supported where it can be demonstrated that provision is made to address the impacts on infrastructure. Health and social care infrastructure and services, including both services provided in the community directly by Health Boards (and services provided on their behalf by contractors such as GPs, dentists and pharmacists) is specifically included in the Infrastructure First definition in NPF4.

Planning obligations for the delivery of health infrastructure is also mentioned in the Local Development Planning Guidance, which states that where planning authorities intend to seek planning obligations for delivery of infrastructure, e.g. transport, health and education infrastructure, the approach to be set out in the LDP may benefit from being developed collaboratively with infrastructure providers.

As the Topic Paper sets out, the Council has committed to carry out future analysis with partners to consider the capacity required to support future demand for healthcare infrastructure. Only if increased capacity is required in certain areas would consideration be given to requesting planning obligations for healthcare infrastructure. To be clear it is anticipated that planning obligations would only be sought for infrastructure delivery, in the form of land or buildings required for new or expanded HSCP owned facilities (or for the reconfiguration of internal space to provide additional capacity); not for the funding of health and care services such as new GPs or other health care roles; and not to directly benefit or supplement a private business.

The Comments from NHS Greater Glasgow & Clyde that Healthcare infrastructure across NHSGGC is much wider than just GPs is noted, and this will be considered when assessing the impact of new development on healthcare infrastructure through LDP3.

The Council fully recognises the need to consider the five tests of NPF4 Policy 18 Infrastructure First and Circular 3/2012 Planning Obligations and Good Neighbour Agreements when planning infrastructure mitigation. Compliance with these tests has been a matter of Council policy for some time, and the tests are referenced in both Strategic Policy 2 of the Council's LDP2 and the Council's adopted Development Contributions Supplementary Guidance (2023). In line with this policy, planning obligations are agreed in accordance with the five tests of Circular 3/2012 and contributions required are to be proportional to the scale and kind of development and so closely related to the impact of the proposed development that it should not be permitted without them.

The Council firmly believes that new development should not adversely impact upon existing levels of service provision, infrastructure, or the quality of the environment. As set out in the Topic Paper, planning obligations will form an important component of the overall funding package and the Council will seek to utilise legal/planning obligations, as appropriate, to ensure that development is acceptable in planning terms and that infrastructure is provided to support the development of the area. This also ensures that the costs of such required mitigation is funded by the development and not the general public.

The Council recognises that viability will be a key consideration when determining the suitable level of planning obligations. However, Council policy is clear that the financial implications of the Council's planning obligations policy should be factored into development appraisals prior to land deals and commercial decisions being taken.

As stated in the Topic Paper, the Proposed Plan will set out a strategy to address the infrastructure issues identified through this and other topic papers and ensure growth is delivered under a planned and phased approach. Multi-agency partnership and collaborative working with Key Agencies; infrastructure and utility companies; education providers; the development industry; community organisations; other technical bodies; and stakeholders will assist with delivering the infrastructure required to support the Plan's emerging spatial strategy and informing this Evidence Report. This joined up approach will ensure that locational needs are understood and current and future demands for infrastructure are met.

The Council is aware of the challenges presented by an infrastructure first approach and a mixture of solutions will need to be utilised to address infrastructure requirements including optimising the use of current assets as outlined in the Property Estate and Accommodation Strategies. As stated in the Topic Paper, the LDP needs to reflect the current aspirations of the Council for meeting housing and infrastructure needs and growing the local economy. It must also reflect what can realistically be delivered, taking into account infrastructure and funding considerations and the timing for both. With growth and demographic changes comes the pressure on existing infrastructure and the need for additional infrastructure to be delivered in the right place and at the right time. It requires a planned and coordinated view of priorities across the Council area and requires allocating and utilising existing and identification of new sources of funding that can deliver infrastructure projects.

As stated in the Topic Paper, once there is greater certainty over the spatial distribution of planned growth, specific development-based infrastructure assessments will be carried out that will identify more accurately the actual infrastructure needs and costs based on greater detail and understanding of requirements and capacity at that point in time. This will be reflected in the LDP3 Delivery Programme and development briefs or master plans.

In response to the comment that it is important that the Council apply a cohort progression model to forecasting school rolls, East Renfrewshire's Pupil Yield Projection Model (as previously referred to as the cumulative approach) is a methodology which has served the Council well over the years with projected school rolls historically aligning very closely to actual school rolls. This methodology is described and referenced within the Education Topic Paper (Topic 15) and discussed in more detail in the Development Contributions Supplementary Guidance (June 2023) (as well as the October 2019 Education Background Report (BR4) which supported the preparation of LDP2 and Issue 13 of the LDP2 Examination Report). The models' share some similarities; however, the 'Pupil Yield Projection Model' has been accepted by the Scottish Government and Development Industry; it is a tried and tested model which works well for our unique authority. The cumulative approach (the principle on which the East Renfrewshire's Pupil Yield Projection Model is based) was also considered 'appropriate' by Homes for Scotland within their response to Fife's Planning Obligations Supplementary Guidance Consultation Draft May 17 (Para 2.6).

The Council's Pupil Product Ratio (PPR) analysis is carried out every two years. As stated in the Education Topic Paper, this is a robust, complete and thorough process. As well as analysis on new developments, reviews are also carried out on 'older' sites which suggest housing numbers do not decrease over time in some areas (sites built more than 10 years ago). In analysing

development sites within both the East and West of the authority (Newton Mearns, Barrhead, Busby/Clarkston/Eaglesham Communities), it is evident sectors have increased in number, in some cases even doubling from developments completed in 2011/12, from 2018 – 2022 analysis (a period containing 3 PPR studies), highlighting that in East Renfrewshire, numbers are not necessarily reducing over time and developments with ‘family style homes’ continue to generate school age children long after being ‘established.’ This analysis will continue through the biannual PPR studies which will inform pupil yield projections. Further detail is contained in the Council’s response to comments received to Topic Paper 15 - Education.

In order for the Council to act in accordance with its legislative duty for best value, it will be essential for the Education Department to make most effective and efficient use of its school estate wherever possible. However, as can be noted from the analysis of projected future school rolls and capacities, it is very likely that new education infrastructure solutions will be required. The scale of these solutions will be dependent on many factors including: the volume of new housing proposed; the phasing of the development and sale of the new housing; locale; and parent choice of schooling, given the type of development.

The Council agrees that Green Belts should be identified or reviewed as part of the preparation of LDPs. Topic Paper 13: Housing acknowledges that the Landscape Character Assessment (LCA), Site Assessment Framework and SEA will be crucial in identifying potential spatial options for the Proposed Plan to meet the 10-year housing requirements. The topic papers clearly state that further revision to the Green Belt boundaries will be required, once the spatial distribution of sites is known.

As stated in the Topic Paper, the Council consider that infrastructure considerations should be at the heart of planning and place making. Plans, strategies and delivery programmes should promote a more sustainable use of infrastructure, making better use of existing assets and prioritising low carbon infrastructure.

Gate Check

The Council is of the view that agreement has not been reached on disputes regarding planning obligations towards healthcare infrastructure. This topic may require to be considered further by the Reporter. This matter is covered further under the response to Topic Paper 020: Health and Wellbeing.

<p>East Renfrewshire LDP3 Issue Topic Paper 015: Education</p>	<p>NPF4 - Liveable Places Policy 18: Infrastructure First</p>
<p>Information required by the Act regarding the issue addressed in this section</p>	<p>2019 Planning (Scotland) Act</p> <p>Section 15(5):</p> <ul style="list-style-type: none"> • the education needs of the population of the district and the likely effects of development and use of land on those education needs; and • the capacity of education services in the district (including early years; primary; secondary; additional support needs; further; and higher education services).
<p>Links to Evidence</p>	<ul style="list-style-type: none"> • National Planning Framework 4 (NPF4) 2023 (CD102) • Scottish Government Pupil census summary statistics (2024) (CD 115) • 2018 NRS population projections (CD 047) • National Records of Scotland (NRS) (2023) birth and death rates (CD 049) • National Records of Scotland (NRS) - Migration Statistics Quarterly Summary for Scotland 2021 (CD 045) • NRS 2021, Migration to and from administrative areas (CD 046) • 2022 census rounded population estimates data (CD 080) • Scotland's census 2022 (CD 081) • NRS Household estimates 2022 (CD 044) • East Renfrewshire Council Report - Local Development Plan 1: Education Development Contributions: update to base data and cost information (26 June 2019) (CD 223) • East Renfrewshire adopted Development Contributions Supplementary Guidance (June 2023) (CD 203) • East Renfrewshire LDP2 Education Background Report (EBR) (2019) (CD 247) • East Renfrewshire PPR ESRI Map (CD 261)

- East Renfrewshire [adopted Local Development Plan 2 \(March 2022\) \(CD 206\)](#)
- East Renfrewshire [adopted Local Development Plan 1 \(June 2015\) \(CD 205\)](#)
- [East Renfrewshire Council Report 2023- Availability of school places at Maidenhill Primary School \(CD 224\)](#)

Summary of Evidence

The purpose of this Topic Paper is to provide an overview of current Pupil Product Ratios, outline existing education pressures, provide an overview of an audit of school condition, and set out the projected impact of LDP3 on the School Estate.

The topic paper focuses on the potential future education provision requirements, developed from the collaborative work of officers from the Education and Environment departments in East Renfrewshire Council.

Section 1 outlines the Policy Context as provided by NPF4.

Section 2 outlines the Education Context for East Renfrewshire. The high quality of education provision across East Renfrewshire's educational establishments, is the bedrock which allows for the delivery of sector leading experiences and high levels of achievements and successes by our children, young people and staff, which is recognised nationally. As a direct result of both the historical and continuous successful outcomes of all our learners and the desirability of the Local Authority as a place to live over the years, there has been a significant growth in the number of children attending our schools and early year's facilities. Undoubtedly, education is a fundamental contributor to the marketability of new homes in the area.

There has been considerable investment in the education estate including in recent years: increasing the number of places available at St Ninian's High School and Isobel Mair School; the creation of the joint faith campus for St Clare's and Calderwood Lodge primary schools and nursery class; the development of further early learning and childcare provision with the development of St John's Nursery Class; and the development of Maidenhill Primary School and the recently opened Neilston Learning Campus (March 2024).

Provision across all sectors has expanded in response to growth and new statutory requirements, such as the provision of 1140 hours of early learning and childcare, nonetheless many educational establishments have consistently high occupancy levels. Further expansion will require long-term planning and funding solutions.

Section 3 outlines Existing Pressures and East Renfrewshire Education Estate. Many of East Renfrewshire's educational establishments continuously operate at high occupancy levels. The Council's notional maximum occupancy, over which development contributions will be sought, is 90% for early learning and childcare (ELC) and primary and 85% for secondary schools. Above these levels, efficient operation of the establishments is significantly compromised, and facilities are pushed beyond optimum utilisation. The paper highlights the existing pressures on the early years (table 1) and the primary and secondary (table 2) estate.

Section 4 highlights the existing pressures on additional Support Needs (ASN) (table 3).

Section 5 provides an overview of Pupil Product Ratios (PPRs), the calculation methodology and the links with the adopted Development Contributions Supplementary Guidance. The Education and Environment departments closely monitor the provision of school places and regularly undertake an assessment of PPRs which is the anticipated propensity of children and young people of school age generated from new residential units. PPRs are periodically reviewed every two years to ensure accurate forecasting of occupancy levels throughout the school estate. PPRs are shown in table 6.

Section 6 provides an overview of the Projection Methodology used when planning for new housing developments and projecting future demands on the education estate. This is a methodology which has served the Council well over the years with projected school rolls historically aligning very closely to actual school rolls.

Section 7 provides an overview of the Maidenhill Primary School delivered as part of the wider Maidenhill master plan. Initially development at Maidenhill was restricted (by legal agreement) to ensure that no family homes were occupied until Maidenhill Primary School was open and fully operational in August 2019. This restriction allowed all new resident children to be accommodated in their catchment school. The section highlights the impact of a quicker build out rate on the school and proposed mitigation plans to accommodate increased demand. All catchment children who have applied for a place at the school have though been accommodated.

Section 8 provides an overview of school Condition and Projected Estate. Projections informing the anticipated occupancy levels are shown in table 9 which considers the housing programming (as set out in the 2023 HLA) of sites allocated in LDP2 and factors in approved residential windfall sites with planning permission up to 2031. The position beyond 2031 up to 2033 is estimated by factoring in the longer-term programming. Detail on the school condition is also included (A- Good, B – Satisfactory, C – Poor). The paper highlights that from the analysis of projected future school rolls and capacities, it is very likely that education solutions will be required. The scale of these solutions will be dependent on many factors including: the volume of new housing proposed; the phasing of the development and sale of the new housing; locale; and parent choice of schooling, given the type of development.

Section 9 sets out the implications for LDP3, which have been informed by the analysis and outputs in the report.

The LDP3 Evidence Report SEA Scoping Report (April 2024) defines the scope/level of detail to be covered in the Environmental Report for the Proposed Plan. Section 4 provides an overview of the environmental characteristics of East Renfrewshire. Table 2 sets out the SEA objectives relating to each SEA theme which includes a section on Education considerations within the population and place themes.

Summary of Stakeholder Engagement

Section 4 'Engagement Statement' of the Evidence Report summarises the various engagement and consultation activities that have been undertaken to inform the Evidence Report. This includes collaborative working with Key Agencies and other stakeholders in the preparation of Topic Papers and the Play Sufficiency Assessment, and other place-based engagement and workshops.

A series of Topic Papers were prepared structured around the sustainable, liveable and productive places themes of National Planning Framework 4.

Wider external engagement with stakeholders commenced on 12th April and ended on 10th May 2024, inviting people interested in LDP3 to review the Topic Papers that cover their areas of interest and to share their comments. The aim of the engagement was to establish areas of agreement or disagreement and any additional evidence that should be taken into account.

The Topic Papers were published on the Council's Local Development Plan Hub on Commonplace, and through the Council's LDP3 website, Facebook and Twitter account and email notifications were sent to individuals and organisations listed on the LDP contact database.

The SEA Scoping Report was submitted to the SEA Gateway consultation authorities on 19th April for a 6-week consultation period. The Gateway Authorities were generally supportive of the Scoping Report subject to a few points for consideration for the Environmental Report to be prepared alongside the Proposed Plan. Comments are summarised in Section 4 Table 1 of the Evidence Report.

Summary of Implications for the Proposed Plan

At the heart of all decision making for local authorities in Scotland, is the legislative duty to ensure best value. The Local Government in Scotland Act 2003 introduced a statutory framework for best value for local authorities which requires local authorities to make arrangements to secure continuous improvement in performance (while maintaining an appropriate balance between quality and cost); and, in making those arrangements and securing that balance, to have regard to economy, efficiency, effectiveness, the equal opportunities requirement and to contribute to the achievement of sustainable development. The requirement for best value will lie at the heart of considerations relating to the school estate and the LDP3 process.

There has been significant residential development across the Authority as consequence of LDP2 and approved windfall. At the heart of LDP3, will be the essential need to ensure that new residents are able to access excellent education provision across all sectors and to ensure that the Council is able to meet its statutory requirements.

Whilst there is the opportunity to make better, more effective and efficient use of a small number of educational establishments, given the number of homes that can be expected as a result of LDP3, accommodating the anticipated number of new service users within the current estate alone will not be possible. Furthermore, many existing schools in established areas are unlikely to be able to host the size of extension needed to accommodate significant new development (due to restricted site size or lack of available adjacent land). This may result in the need for catchment redesign and for a change to the current relationships between clusters of primary and secondary schools, in order to make better use of the existing estate and align potential new developments to schools with projected capacity. Any proposed changes to catchment areas will require a full public consultation to be undertaken in accordance with Schools (Consultation) (Scotland) Act 2010 and are likely to be challenging given the historical family ties and expected future educational plans which families will be making on the basis of current arrangements.

Further expansion will not be possible in most areas of the Council, as detailed in the projected estate section, without extending current establishments or establishing new schools. As noted previously, the Council's duty for best value will require solutions which cause minimal financial

impact to the authority. Investment and funding will be considered and taken forward through the Council's Capital Investment Strategy and planning obligations will be actively sought to mitigate the impact of new development and support the delivery of this additional capacity.

The Council has little or no land appropriate for the purpose of any new build estate within its ownership. To predict and project the impact of new build development, the locality and timeline of development will need to be identified. Furthermore, once these sites are identified, the demand for educational places and the subsequent financial cost to the council for new build or adapted establishments, will need to be assessed. From experience and learning of the Maidenhill Masterplan development, any such similar projects with new school provision will require further consideration and detailed analysis to understand and project the full effects of edge of settlement / village style developments where pupil product numbers are likely to be higher than has previously been the case in more established and centralised areas.

The Education and Environment departments of the Council will continue to work in close collaboration to agree a long-term strategic approach to the requirement for residential development whilst fully addressing all educational needs for residents in a coordinated, phased and planned way for this and future LDPs.

Key areas for consideration for LDP3:

1. Sufficiency of school places across all sectors, including additional support needs, and the need to be mindful of changes at a national level such as early learning and childcare;
2. Best use of current estate, including catchment redesign and related clusters of schools;
3. Where education establishments cannot accommodate projected pupil yield from new residential developments, capital funding solutions will be required to create new schools or to extend/repurpose the existing estate;
4. Essential for education provision to be in place, prior to new residences being inhabited;
5. The phasing of residential sites remains a critical component of the Plan's strategy to:
 - a) ensure educational establishments can meet demand for school places for the life of the development;
 - b) To avoid significant additional unplanned cost to the Council in extending /amending the educational estate and associated revenue costs;
 - c) To allow children to be accommodated at their catchment school and avoid being directed to other schools, resulting in a detrimental experience.

Statements of Agreement / Dispute

Statements of Agreement

Skills Development Scotland

Agree broadly with the evidence presented.

Scottish Water

Acknowledges the strategic summary of this topic paper.

Cala Management Ltd (CALA), Robertson Residential Group, Barratt Homes West Scotland & David Wilson Homes West Scotland (Barratt), Miller Homes, Homes for Scotland, ICENI on behalf of The Mac Mic Group, ICENI on behalf of East Renfrewshire Home Builder Consortium (Mac Mic Group; Miller Homes; Robertson Homes, Taylor Wimpey), Taylor Wimpey

Agree broadly with the evidence presented. Note that ERC has the largest average household size in Scotland, impacting the school age population.

Acknowledgement that capacity is an issue in early learning, primary and secondary provision and that education solutions will be required.

Agree with setting of notional maximum occupancy levels over which development contributions should be sought.

Agree to further consideration to include school catchment area reviews at a local and authority wide level plus the requirement of new development to accommodate the anticipated number of new users.

Developers can help contribute to the delivery of high-quality Education.

East Renfrewshire Council Response

The Council acknowledges and welcomes the supporting comments received. In preparing the proposed plan the Council will look into all options for joint working with the development industry to deliver the high-quality education infrastructure required to support new development.

Statements of Dispute

Rosalind Horne

Concerned about Education provision at secondary school level within our area. For example, Mearns Castle High School, is exceeding its optimum operational capacity with the school role increasing at pace. Whilst 3 classrooms are to be added in the near future, that does not address catering, admin support and toilet aspects which are already falling short of the standards East Renfrewshire Council would be wishing for. I believe, in the same way Maidenhill School was built before many houses (although it is now too small) a new nondenominational secondary school needs to be built. The Mearns Castle High school building is falling short in many areas. Whilst, as a school it is performing extremely well, there are children being overlooked because of the sheer size of the school.

Cala Management Ltd (CALA), Robertson Residential Group, Barratt Homes West Scotland & David Wilson Homes West Scotland (Barratt), Homes for Scotland, ICENI on behalf of The Mac Mic Group, ICENI on behalf of East Renfrewshire Home Builder Consortium (Mac Mic Group; Miller Homes; Robertson Homes, Taylor Wimpey) Miller Homes, ICENI on behalf of the Baird Family

Query the use of the cumulative approach for modelling projections versus the suggested cohort progression model. The cumulative approach is referenced as 'simplistic' and there is suggestion the model overestimates the impact of new development whilst the cohort regression model does not assume all pupils will be in attendance from day one and progresses children throughout the school stages from Primary 1 onwards.

Claim reviews by other authorities show spikes caused by new development eventually subside and to ensure this is considered along with analysis for developments completed between 2004 and 2014 to mirror the 10-year LDP period.

East Renfrewshire must provide significantly improved data and evidence along with mechanisms for tracking school populations.

Request for the mitigation table to be expanded and a solution hierarchy determined.

The data on school occupancy levels shows that early years capacity is either nearing capacity or over capacity. Similarly there are capacity pressures for primary and secondary schools. It is acknowledged that given the projected future school rolls and capacities, it is very likely that education solutions will be required.

There are several notes as to potential mitigation including; identification of land in private ownership; consideration as to whether mitigation is temporary or not and what other solutions are viable; are extensions possible and catchment review.

State that an important consideration in mitigating education capacity constraints in the future is the five tests of Circular 3/2012 Planning Obligations and Good Neighbour Agreements. These tests are now included in NPF4 Policy 18 Infrastructure first and compliance with these tests is now a policy matter and not a material consideration.

Suggest financial contributions are only necessary when a school reaches 95% occupancy.

Reference that the cohort progression model was also supported at appeal (Appeal Ref: PPA-150-2010).

State that by increasing allocation of housing sites on green belts, education facilities can be implemented through development briefs and masterplans to ensure existing and new communities have greater access to education. Developers also state that further consideration should be made regarding the Council's acknowledgement that education is a fundamental contributor to the marketability of new homes in the area.

Robertson suggest a medium growth scenario of 6000 homes that could generate £150 million.

Barratt & David Wilson state that development of new Neilston Primary School will further expand school capacity.

MacMic stated that the draft topic paper is written to address the current capacity issues, rather than forecasting ahead to projected population change. Query if expansion of future school estate is required. Education constraints are short term and there is a lack of evidence to suggest issue is long term. The Council will continue to rely on out of catchment placing requests to maintain a healthy school capacity, contradicting NPF4 and 20-minute living.

Suggestion that consideration must be given to housing sites next to existing school sites to allow expansion. Projected decline post 2029.

Notional maximum occupancy does not have a 'statutory definition' along with notes as to how school capacity is explained.

Query as to whether placing requests are required.

East Renfrewshire Council Response

Cohort Regression Model vs East Renfrewshire's Pupil Yield Projection Model:

As stated within the Education Topic Paper East Renfrewshire's Pupil Yield Projection Model (as previously referred to as the cumulative approach) "is a methodology which has served the Council well over the years with projected school rolls historically aligning very closely to actual school rolls." This methodology is described and referenced within the Education Topic Paper and discussed in more detail in the Development Contributions Supplementary Guidance (June 2023) (as well as the October 2019 Education Background Report (BR4) which supported the preparation of LDP2 and Issue 13 of the LDP2 Examination Report). The models' share some similarities; however, the 'Pupil Yield Projection Model' has been accepted by the Scottish Government and the Development Industry; it is a tried and tested model which works well for our unique authority. The cumulative approach (the principle on which the East Renfrewshire's Pupil Yield Projection Model is based) was also considered 'appropriate' by Homes for Scotland within their response to Fife's Planning Obligations Supplementary Guidance Consultation Draft May 17 (Para 2.6).

Furthermore, it is also worth noting that the methodology used by the Council for future pupil rolls takes into consideration the rate of house building as defined within the annual Housing Land Audit and does not make an assumption of all houses being released and occupied simultaneously. This allows the Council to develop a realistic projection of school rolls on the basis of the planned number of properties being developed each year, albeit the rate of home development has in the past been escalated by developers from the original plan, which has resulted in capacity issues (such as has been the case within Maidenhill).

10 Year Analysis:

Pupil Product Ratio (PPR) analysis is carried out every two years – this is a robust, complete and thorough process. As well as analysis on new developments, reviews are also carried out on 'older' sites which suggest housing numbers do not decrease over time in some areas (sites built more than 10 years ago). In analysing development sites within both the East and West of the authority (Newton Mearns, Barrhead, Busby/Clarkston/Eaglesham Communities), it is evident sectors have increased in number, in some cases even doubling from developments completed in 2011/12, from 2018 – 2022 analysis (a period containing 3 PPR studies), highlighting that in East Renfrewshire, numbers are not necessarily reducing over time and developments with 'family style homes' continue to generate school age children long after being 'established.' This analysis will continue through the biannual PPR studies which will inform pupil yield projections.

School Condition & Impact of LDP Expansion (Table 9) & Hierarchy Established:

An overview and evidence is provided within Table 9 as to what options may be available at educational establishments for expansion/increases to school rolls, with consideration given to the projected school rolls until 2033. A hierarchy of mitigations can only be determined once impacts from an approved LDP3 are known.

Potential Education Solutions:

The suggestion of purchasing private land for development of education estate would result in the need for significant capital investment. As noted in Topic Paper 15, any development sites should result in "minimal financial impact to the authority." The Education Authority will always take an approach which ensures the best educational experience for its learners and staff. Historically (and

going forward) the department has considered and implemented capacity solutions using temporary and permanent options, dependent on; scale; duration; technical ability; and necessity. However, it is worth noting in the case for permanent fixtures over temporary, in recent years they have not only proven to be the best solution, but also the best value for money, given the hugely inflated costs of temporary accommodation. Table 9 and Section 9 on Implications suggest solutions that may be considered in response to LDP3 developments including school extensions and catchment reviews.

Five tests of Circular 3/2012 Planning Obligations and Good Neighbour Agreements:

The Council fully recognises the need to consider the five tests of *Circular 3/2012 Planning Obligations and Good Neighbour Agreements* when planning infrastructure mitigation. The comments made, that the tests of the circular are now included in NPF4 Policy 18 Infrastructure first and that compliance with these tests is now a policy matter and not a material consideration, are noted. Compliance with these tests has been a matter of Council policy for some time, and the tests are referenced in both Strategic Policy 2 of the Council's LDP2 and the Council's adopted *Development Contributions Supplementary Guidance (2023)*. In line with this policy, *Development Contributions* are agreed in accordance with the five tests of Circular 3/2012 and contributions required are to be proportional to the scale and kind of development and so closely related to the impact of the proposed development that it should not be permitted without them.

Financial Contributions for Triggers of 95%:

Evidence is provided and other papers are referenced within the Education Topic Paper (Topic 15), relating to the trigger markers for financial contributions: "Above these levels, efficient operation of the establishments is significantly compromised, and facilities are pushed beyond optimum utilisation." As stated, "for planning purposes and to work the school estate efficiently, the ideal occupancy threshold for primary schools and ELC is 90% whilst secondary schools is 85%." This is also evidenced clearly in the *Supplementary Guidance 2023*. "85% for our secondary schools is required to support our refreshed vision for 'Advancing Excellence and Equity in Education in East Renfrewshire' and respond to priorities set out in the National Improvement Framework." As referenced with Topic Paper 15, some Authorities have lower parameters.

Cohort Progression Model Supported at Appeal (Appeal Ref: PPA-150-2010):

The Council has a robust, detailed, reliable and valid approach to the analysis of our pupil product ratios and pupil projections, with significant experience of this, over a considerable period of time. ERC has developed PPRs for six sectors, including four which are further refined by different regions; arguably a sector leading level of analysis, which has allowed us to manage the school estate effectively, ensuring school places for all pupils whilst making our estate work hard. Developments completed as much as 15 years ago are on occasion showing increases in pupil product ratios in later years, suggesting that pupil yield does not decrease in East Renfrewshire. Additionally, no assumption can be made as to what year pupils enter the ERC school system.

Although this particular appeal was approved on individual circumstances, it does not mean this approach should be applied across the board, additionally the 'cohort regression model' is not actually referenced as such. Furthermore, our model has been accepted by the Scottish Government's reporter, through LDP2.

Neilston Learning Campus:

Neilston and St Thomas' primary schools previously had the lowest evaluation of condition of all schools across East Renfrewshire. Consequently, the Council made a submission for capital support from the Scottish Government's Learning Estate Investment Programme (a capital investment strategy to address the worst condition schools in the country) for the creation of Neilston Learning Campus. The Council was successful in its bid and the new Neilston Learning Campus (comprising Neilston & St Thomas' primary schools and Madras Family Centre) was created on a like for like scale as the previous individual establishments and did not create any additional school places for these communities.

Improved Data & Evidence and Mechanisms for Tracking School Populations:

As noted previously, the Council has invested significantly in its process and collaborative inter-departmental working to develop a reliable process for the projection of school rolls, with consideration of new and established residential areas. By review of the Council's proposed LDP2 position by the Scottish Government's Reporter, these approaches towards pupil projections have been accepted by the Scottish Government and the Development Industry; the approach of the Council in this matter is a tried and tested one, which works well for our unique authority.

Due to the sensitivity of certain data, such as pupil locale or religion, this cannot be shared out with the Authority, and this has been reiterated to developers; "Discussions have been held with the Council's legal team and on the basis of our legal duty to protect children's identity, it is the Council's opinion that personal data referencing address and denomination (via inference of what school sector the child attends) of those East Renfrewshire's pupils in the dataset should not be provided. This would be inappropriate and could potentially be used in the identification of individual pupils".

Notional Maximum Occupancy and School Capacity:

To meet curricular demand and facilitate the smooth running of a school, it is not possible to utilise 100% of teaching rooms, or consequently pupil places, throughout the school day. Even with the most efficient timetabling only a percentage of teaching rooms and pupil places can be utilised at any one time.

The notional maximum occupancy levels of 90% for primary and 85% for secondary schools, is necessary so as to ensure that all children who attend a school are able to access all areas of the curriculum (as is their legal entitlement) and to allow for personalisation and choice for learners of their desired learning pathway. If a school's roll exceeds the respective notional maximum capacity, the school's ability to meet the needs of its learners is compromised and therefore results in a detrimental impact on learners and staff, their experiences and outcomes.

Further detail on the notional occupancy levels are detailed elsewhere within the paper. "Planning capacity governance from the Scottish Government 'Determining Primary School Capacity (2014)' acts as guidance only for Local Authorities. It is stated in this guidance that 'It remains a Local Authority responsibility to choose how they calculate capacity in their areas.' In East Renfrewshire there is a practical and maximised approach taken in determining the planning capacity."

Placing Requests Not Required:

The Council has a duty to ensure that it has sufficient places for its resident population and thereafter has a duty to grant placing requests in accordance with relevant legislation.

School Admissions and Placing Requests are legislative matter. Where a school has available places in excess of the required spaces for catchment applicants and reserved spaces, the Council is legislatively duty bound to grant such available places to placing request applicants.

Each year the Education Department receives a significant number of placing request applications from families who do not reside within the Council's boundary, given the Council's reputation for educational excellence. As before, where there are spaces available, these must be granted.

Over the years, the number of placing requests which have been granted has decreased significantly given the demands from catchment residents. Further information and specific detail is provided in the Topic Paper.

Forecasting Projected Population Change, Evidence Expansion of School Estate, Short Term Constraints:

The purpose of the Education Topic Paper is to provide a review on the current Education situation. Sufficient evidence on population projections is provided within the 'Research & Analysis' section, whilst pupil projections are discussed within the projected impact of LDP2 on the school estate. Further pupil projections and the potential impact on school estate infrastructure can only be analysed once more is known on the volume, rate of development and location of housing proposed through LDP3.

Whilst it is acknowledged that some schools have experienced a slight decline in P1 rolls over recent years, later Primary Stage rolls (P4-7) are rising. Additionally, the overall roll in primary and secondary continues to increase year on year, particularly when reviewing the East Renfrewshire resident only roll. Birth rates are not indicative to the East Renfrewshire population as families become resident in the Council area for school services, as evidenced in 'Research & Analysis' section of the Education Topic Paper.

Due to the popularity of the estate, clearly evidenced within the Education Topic Paper, it is not expected that constraints currently experienced are a 'short-term' issue. National Records of Scotland statistics as well as Table 9 within the Topic Paper confirm this. LDP3 will pose new and additional pressures which will be assessed in due course.

Authority Relies on Placing Requests:

The authority does not rely on placing requests, this is evidenced with the 'Education Context' and 'Research & Analysis' sections of the Education Topic Paper. The Councils approach towards Local Living is clearly set out in Topic Paper 012: Local Living.

Other issues:

The Council notes comments about identifying land for residential development near schools. The marketability of proposals will be considered through the Site Assessment Framework. The site assessment methodology outlines a series of criteria that sites will be assessed against. The Landscape Character Assessment (LCA) and SEA will also be crucial in identifying potential spatial options for the Proposed Plan to meet the housing requirements.

Roberstson suggested LDP3 promote a Medium Growth Scenario of 6000 Homes - particularly in the East of the Authority for every 10 houses, we have almost 10 children so 6000 homes would generate potentially an additional 6000 children. As explained within the Housing Topic Paper an

indicative 10 year Housing Land Requirement of 3100 homes has been set. This figure is viewed as ambitious and realistic when considering infrastructure, funding and environmental constraints.

Gate Check

The Council is of the view that agreement has not been reached on all areas of dispute. This topic may require to be considered further by the Reporter.

<p>East Renfrewshire LDP3 Issue Topic Paper 016 – Heating and Cooling</p>	<p>NPF4 - Liveable Places Policy 19: Heating and Cooling</p>
<p>Information required by the Act regarding the issue addressed in this section</p>	<p><u>2019 Planning (Scotland) Act</u></p> <p>Section 15(5):</p> <ul style="list-style-type: none"> • The infrastructure of the district (including systems for the supply of water and energy). <p>Other statutory requirements:</p> <ul style="list-style-type: none"> • Local Heat and Energy Efficiency Strategies (LHEES)
<p>Links to Evidence</p>	<ul style="list-style-type: none"> • Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 (CD 011) • East Renfrewshire Local Heat and Energy Efficiency Strategy (LHEES) (2024) (CD 253) • National Planning Framework 4 (NPF4) 2023 (CD 102) • Heat Networks Act (2021) (CD 026) • Draft Scottish Energy Strategy and Just Transition Plan (2023) (CD 013) • UK Hydrogen Strategy (CD 163) • Hydrogen Policy Statement (2020)(CD 109) • Hydrogen action plan (2022) (CD 108) • Heat in Buildings Strategy (2021) (CD 100) • Climate Change Plan Update (2020) (CD 106) • Energy Efficiency Standard for Social Housing (EESH) (CD 019) • New Build Heat Standard (CD 059) • Heat in Buildings Bill (Consultation 2023) (CD 099) • East Renfrewshire Get to Zero Action Plan (GTZAP) (CD 240) • East Renfrewshire adopted Local Development Plan 2 (March 2022) (CD 206) • Scotland Heat Map (CD 075)
<p>Summary of Evidence</p>	
<p>The purpose of this Topic Paper is to provide background information on the subject of heating and cooling. The Topic Paper explains the current situation on heating and cooling across East Renfrewshire and the importance of improving energy efficiency in buildings and promoting new development to meet net zero.</p>	

Local Development Plans should take into account the area's Local Heat & Energy Efficiency Strategy (LHEES). The spatial strategy should take into account areas of heat network potential and any designated Heat Network Zones (HNZ).

Section 1 provides an overview of heating and cooling, setting out the ambition for East Renfrewshire. In November 2022, East Renfrewshire Council set a target for net zero carbon emissions by 2045. A Local Heat and Energy Efficiency Strategy (LHEES), which is a legislative requirement, is identified in the Council's Get to Zero Action Plan as a key action. The Council's LHEES sets out a long-term strategic framework for the improvement of the energy efficiency of buildings in the local authority's area and the reduction of greenhouse gas emissions resulting from the heating of such buildings.

Section 2 provides an overview of the policy context as provided by NPF4 and the Heat Networks Act. The Topic Paper recognises the need to encourage, promote and facilitate development that supports decarbonised solutions to heat and cooling demand and ensure adaptation to more extreme temperatures

Section 3 provides an overview of national, regional and local strategies that inform LDP3 as shown in the evidence section above. This includes Draft Scottish Energy Strategy and Just Transition Plan (2023), UK Hydrogen Strategy, Draft Scottish Energy Strategy and Just Transition Plan (2023), Hydrogen Action Plan (2022), Heat in Buildings Strategy (2021), Climate Change Plan Update (2020), Energy Efficiency Standard for Social Housing (ESSH), New Heat Build Standard, Heat in Buildings Bill (Consultation 2023), East Renfrewshire Get to Zero Action Plan (GTZAP), East Renfrewshire Local Heat and Energy Efficiency Strategy (LHEES) (2024) and East Renfrewshire adopted Local Development Plan 2 (LDP2) (2022).

Section 4 sets out a potential heat network zones by providing a summary of initial feasibility reports on two heat network zones at Eastwood Park and Barrhead Main Street and outlines the important role of Scotlands Heat Map. Challenges on the delivery of heat networks are also set out.

Section 5 sets out the implications for LDP3, which have been informed by the analysis and outputs in the report.

The LDP3 Evidence Report SEA Scoping Report (April 2024) defines the scope/level of detail to be covered in the Environmental Report for the Proposed Plan. Section 4 provides an overview of the environmental characteristics of East Renfrewshire. Table 2 sets out the SEA objectives relating to each SEA theme which includes a section heating and colling within the Climatic Factors theme.

Summary of Stakeholder Engagement

Section 4 'Engagement Statement' of the Evidence Report summarises the various engagement and consultation activities that have been undertaken to inform the Evidence Report. This includes collaborative working with Key Agencies and other stakeholders in the preparation of Topic Papers and the Play Sufficiency Assessment, and other place-based engagement and workshops.

A series of Topic Papers were prepared structured around the sustainable, liveable and productive places themes of National Planning Framework 4.

Wider external engagement with stakeholders commenced on 12th April and ended on 10th May 2024, inviting people interested in LDP3 to review the Topic Papers that cover their areas of interest and to share their comments. The aim of the engagement was to establish areas of agreement or disagreement and any additional evidence that should be taken into account.

The Topic Papers were published on the Council's Local Development Plan Hub on Commonplace, and through the Council's LDP3 website, Facebook and Twitter account and email notifications were sent to individuals and organisations listed on the LDP contact database.

The SEA Scoping Report was submitted to the SEA Gateway consultation authorities on 19th April for a 6-week consultation period. The Gateway Authorities were generally supportive of the Scoping Report subject to a few points for consideration for the Environmental Report to be prepared alongside the Proposed Plan. Comments are summarised in Section 4 Table 1 of the Evidence Report.

Summary of Implications for the Proposed Plan

Although the current LDP2 provides a strong framework in developing place-based solutions to a zero-carbon future and contains strong policies on climate change adaptation and mitigation, it will be critical to build upon this in the preparation of LDP3. The LDP spatial strategy should be designed to reduce, minimise or avoid greenhouse gas emissions. The Climate Emergency declared by East Renfrewshire Council and the Get to Zero Action Plan requires the Council to take urgent action to address the risks of climate, change to meet key targets for reduction in carbon emissions.

National policy, including NPF4 is supportive of renewable and low carbon energy development, in order to support a Just Transition to the low carbon economy.

LDP3 has a key role to play in increasing awareness of the importance of improving energy efficiency in buildings and promoting new development to meet net zero. It is vital to encourage, promote and facilitate development that supports decarbonised solutions to heat and cooling demand and ensure adaptation to more extreme temperatures.

Statements of Agreement / Dispute

Statements of Agreement

Scottish Water

Scottish Water welcomes and supports East Renfrewshire Council's strategy to develop and deliver decarbonised heat interventions and heat network opportunities. We recognise the importance of identifying and delivering suitable heat solutions and their role in achieving the goals set out in the Local Heat and Energy Efficiency Strategy. We will support future expansion as necessary as we work together to build a more sustainable future. Early engagement with Scottish Water is always encouraged to determine proposed network locations and infrastructure requirements.

Homes for Scotland

HFS agree broadly with the evidence. The Building (Scotland) Amendment Regulations 2023 (New Heat Standard) has changed the way that new homes will be heated and the associated carbon emissions. Section 72 of the Climate Change (Scotland) Act 2009 introduced Section 3F into the Town and Country Planning (Scotland) Act 1997. Section 3F requires local development plans to contain policies that require new buildings to be designed to avoid a specified and rising proportion of greenhouse gas emissions from their use through the installation and operation of low and zero-carbon generating technologies.

As of 1 April 2024, the above regulations combined with national planning policy and heat policy go much further than what section 3F can achieve. The requirement to include policies within development plans under Section 3F is therefore no longer necessary and as detailed within the Climate Change Act – Section 72: fourteenth annual report work is commencing to prepare a repeal Order for consideration by the Scottish Parliament.

ICENI On behalf of East Renfrewshire Home Builder Consortium (Mac Mic Group; Miller Homes; Robertson Homes; Taylor Wimpey), ICENI on behalf of The Mac Mic Group, Miller Homes
Agree broadly with the evidence.

ICENI on behalf of the Baird Family

Agree broadly with the evidence. The response acknowledges that through LDP3 there is a role for the plan in increasing awareness of improving energy efficiency in buildings and promoting new development to meet net zero. Whilst this should be encouraged it should not be to the detriment of the house building industry. Carbon reduction measures can be costly and there must be a balance in enabling development to be viably built out to provide homes that are affordable for aspiring homeowners.

East Renfrewshire Council Response

The Council acknowledges and welcomes the supporting comments received.

The Council recognises the comments raised in the response and that viability is a key matter to be considered. However, the policies of NPF4 and the new LDP have a pivotal role to play in tackling climate change and associated risks. New development that will be identified in LDP3 provides opportunities to factor in net zero objectives, sustainable design, green network and nature-based solutions, biodiversity enhancements, active travel and other appropriate climate mitigations at the outset of the design process.

Statements of Dispute

Homes for Scotland, ICENI On behalf of East Renfrewshire Home Builder Consortium (Mac Mic Group; Miller Homes; Robertson Homes; Taylor Wimpey), ICENI on behalf of The Mac Mic Group, Miler Homes,

If ERC aim to reach net zero carbon emissions by 2045, the council must release large strategic sites capable of generating renewable energy.

The heating and cooling of our homes is dependent on and not limited to location, altitude, orientation, principal design, and fabric heat loss. Most East Renfrewshire homes currently fall outwith any potential Heat Network Zones (HNZ). There is however potential for standalone heat

networks provided by an independent distribution network operator to be viable for larger new housing developments. This could involve a centralised energy centre comprising of air source heat pumps or network of ground source heat pumps. Homes post 2023 building standards will have a lower heat demand than pre-2023 building standards and require a higher unit trigger number for a commercially viable heat network. HNZ are therefore unviable in East Renfrewshire unless they are part of a new strategic housing allocation.

HNZs are supported in principle, however where there are multiple landowners and interests' development is likely to be delayed due to the requirement to form an Energy Services Company (ESCo). Additionally, it is not clear how infrastructure belonging to an ESCo within the potentially adopted road network would be considered by a roads authority.

It is unreasonable to require a development to be designed and constructed to connect to a potential future heat network at a later date. The extent of any safeguard within the adopted road network, private garden ground and homes would be unknown whilst the cost associated with retrofitting a solution is likely to be prohibitive. There is also no guarantee that homeowners will be willing to convert from an existing energy provider to an ESCo.

In terms of new strategic housing allocations, this topic paper is intrinsically linked with the Greenbelt, housing and the Energy topic paper. Findings and key issues for LDP3 must reflect findings of the related papers.

East Renfrewshire Council Response

The LDP will take into account the requirements of Policy 19: Heat and Cooling of NPF4 which require the spatial strategy to take into account areas of heat network potential and any designated Heat Network Zones (HNZ). Criteria 16a states that proposals within or adjacent to a Heat Network Zone identified in the LDP will only be supported where they are designed and constructed to connect to the existing heat network.

Gate Check

The Council is of the view that there are no areas of dispute to be considered at Gate Check for this topic.

<p>East Renfrewshire LDP3 Issue: Topic Paper 017 – Blue Green Infrastructure</p>	<p>NPF4 - Liveable Places Policy 20: Blue and Green Infrastructure</p>
<p>Information required by the Act regarding the issue addressed in this section</p>	<p>2019 Planning (Scotland) Act</p> <p>Section 15(5):</p> <ul style="list-style-type: none"> • the principal physical, social, and environmental characteristics of the district; and • the principal purposes for which the land is used. <p>Regulation 9</p> <ul style="list-style-type: none"> • Have regard to any open space strategy. <p>Other statutory requirements:</p> <ul style="list-style-type: none"> • Core Paths Plan (Access Rights) • Food growing strategy
<p>Links to Evidence</p>	<ul style="list-style-type: none"> • National Planning Framework 4 (CD 102) • Central Scotland Green Network (CD 167) • Glasgow Green Network (CD 185) • East Renfrewshire Adopted Local Development Plan 2 (LDP2) (CD 206) • East Renfrewshire adopted Green Network Supplementary Planning Guidance (CD 204) • East Renfrewshire blue and green infrastructure projects map (CD 289) • East Renfrewshire greenspace within the urban area where green and blue infrastructure could be retrofitted map (CD 290) • Scotland's Environment Hub (CD 087) • SEPA Water Classification Hub (CD 152) • Scotland's Environment - River recovery potential (CD 149) • Scottish Government Water Resilient Places Policy (CD 119) • East Renfrewshire Blue Network (CD 210) • East Renfrewshire - Open Space Audit (CD 197)
<p>Summary of Evidence</p> <p>Blue and green infrastructure is defined in NPF4 as features or spaces within the natural and built environment that provide a range of ecosystem services. Services such as clean water, flood regulation, air quality, and recreational opportunities.</p>	

Section 1 sets out an overview of the policy context including NPF4, the adopted LPD2 and associated Green Network SPG. Section 1 summarises the role played by the Central Scotland Green Network and Glasgow Clyde Valley Green Network in providing strategic oversight and facilitating project collaborations which deliver ambitious initiatives that contribute the green/blue network across the wider Glasgow City Region and Central Belt of Scotland.

Section 2 provides information on the blue/green infrastructure resource in East Renfrewshire. The network comprises parks and open spaces, the Whitecart and Levern rivers and their tributaries, urban woodlands and built features such as SUDS ponds, swales and flood attenuation basins. Blue and green infrastructure provides ecosystem services such as air purification, storm water management, active travel routes, water quality, noise reduction, carbon sequestration, place making, outdoor recreation and reduced urban heat.

The spread of blue/green infrastructure is uneven with Giffnock, Stamperland and Clarkston having the least resource. Opportunities for retrofit of green infrastructure are limited in these neighbourhoods. Green infrastructure retrofit on Council owned land includes the Clyde Climate Forest planted in underused amenity grass in Dunterlie and the active travel network created alongside the Capelrig Burn in Newton Mearns

The policy swing to green infrastructure over the last two decades has delivered a growing number of housing developments where blue/green infrastructure is incorporated into the design. Private developments at Ayr Road and Barrhead South have demonstrated successful design of blue/green infrastructure with thoughtful landscape design combining path networks, flood water management, play space and biodiversity enhancements. Notwithstanding this positive trend there could still be greater consideration given to multi-functionality especially re-thinking how SUDS basins can deliver more benefits beyond simple management of water run-off.

Section 3 sets out the implications for LDP3, which have been informed by the analysis and outputs in the report.

The LDP3 Evidence Report SEA Scoping Report (April 2024) defines the scope/level of detail to be covered in the Environmental Report for the Proposed Plan. Section 4 provides an overview of the environmental characteristics of East Renfrewshire. Table 2 sets out the SEA objectives relating to each SEA theme. Blue and green infrastructure is covered under the Climatic, Biodiversity and Nature, Landscape and Water themes.

Core Path plans are addressed under Topic Paper 10: Transport and the Food Growing Strategy under Topic Paper 21: Health and Wellbeing.

Summary of Stakeholder Engagement

Section 4 'Engagement Statement' of the Evidence Report summarises the various engagement and consultation activities that have been undertaken to inform the Evidence Report. This includes collaborative working with Key Agencies and other stakeholders in the preparation of Topic Papers and the Play Sufficiency Assessment, and other place-based engagement and workshops.

A series of Topic Papers were prepared structured around the sustainable, liveable and productive places themes of National Planning Framework 4.

Wider external engagement with stakeholders commenced on 12th April and ended on 10th May 2024, inviting people interested in LDP3 to review the Topic Papers that cover their areas of interest and to share their comments. The aim of the engagement was to establish areas of agreement or disagreement and any additional evidence that should be taken into account.

The Topic Papers were published on the Council's Local Development Plan Hub on Commonplace, and through the Council's LDP3 website, Facebook and Twitter account and email notifications were sent to individuals and organisations listed on the LDP contact database.

The SEA Scoping Report was submitted to the SEA Gateway consultation authorities on 19th April for a 6-week consultation period. The Gateway Authorities were generally supportive of the Scoping Report subject to a few points for consideration for the Environmental Report to be prepared alongside the Proposed Plan. Comments are summarised in Section 4 Table 1 of the Evidence Report.

Summary of Implications for the Proposed Plan

The growing trend of integrating green infrastructure into new proposals should be encouraged from the outset of the design stage. NPF4 provides a strong policy platform to support this growth. There is a growing number of case studies from the local area, the best examples are showcased in the SPG Green Network. Developers appear to be gaining skills and confidence in this area, suggesting a step-change in quality is achievable in the span of the next LDP.

The LDP3 provides the opportunity to spatially locate green infrastructure in masterplans and design briefs for new development. This work would be most effectively achieved with the support of an up-to-date Open Space Strategy (OSS). The Open Space Audit 2016 (CD 197) which informs the OSS was updated in 2023 to include open spaces created within new developments since 2015. The Audit requires a full revision.

LDP2 includes a schedule of projects which contribute to green infrastructure. Some projects have completed while others have yet to commence. The project list should be reviewed and updated for LDP3. A revised Open Spaces Strategy would provide oversight and identify green infrastructure projects on council owned ground prioritised by the quality and quantity of ecosystem services delivered.

NPF4 policy 20 C states that development proposals in country parks will only be supported where they are compatible with the uses, natural habitats, and character of the park. This is a policy area not covered in LDP2. Given the strategic location of Dams to Darnley Country Park, LDP3 should consider any downstream implications of this new policy requirement.

NPF4 includes the 'Central Scotland Green Network' as National Development number 7. This appears to introduce a policy change in that developments within the CSGN area to create new green infrastructure that would previously have been classified as 'major' developments by 'The Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009', are now classified as *national* development. In other words, any green infrastructure development over 2 hectares in size might now be considered a national development. NPF4 provides a list of the types of development that fall into this category.

- a) Development to create and/or enhance multi-functional green infrastructure including for: emissions sequestration; adaptation to climate change; and biodiversity enhancement;
- b) Reuse of vacant and derelict land and buildings for greening and nature-based solutions;
- c) New and/or upgraded sustainable surface water management and drainage systems and the creation of blue space;
- d) Use of land for allotments or community food growing; and
- e) Routes for active travel and/or recreation.

This might have implications for large projects, using current examples; the Aurs Road project in Dams to Darney Country Park is largescale delivery of active travel routes for recreation. The housing proposal at Barrhead South incorporates an openspace area of multifunctional green infrastructure which is more than two hectares. These developments might be considered as national developments. Future development at Shanks might incorporate the re-use of derelict land for greening. The implications of NPF4 and National Development 7 should be considered when identifying large green/blue infrastructure projects in LDP3.

Statements of Agreement / Dispute

Statements of Agreement

Nature Scot

Agree broadly with the evidence. It would be helpful to provide some detail on the existing blue and green infrastructure projects shown in Figures 1 and 2. This could be a table listing the project sites and their primary function, and potentially additional functions – for example, green space with path network, which also provides biodiversity enhancement.

Taylor Wimpey

Broadly agree with the evidence set out. Agree that the Council determine where the locational need is and what the blue/green infrastructure needs are for specific areas, and this is communicated to developers.

Support the integration of blue and green infrastructure into new proposals and masterplans from the outset of the design process. The benefits of both to biodiversity enhancement and health and wellbeing should not be underplayed.

Cala Management Ltd (CALA)

CALA supports the opportunities to locate green infrastructure in masterplans and design briefs.

Scottish Water

Scottish Water supports and actively encourages the inclusion of blue and green infrastructure approaches when making place-based assessments on the local catchment area and strongly recommends developing blue infrastructure initiatives. Greater consideration on what blue infrastructure can be integrated into the catchment will help to reduce the risk of flooding, create

water sensitive urban design and accelerate delivery of the Scottish Government Water Resilient Places Policy Recommendations.

Scottish Water emphasises the need for closer partnership working to deliver blue-green infrastructure to transform the towns and urban environments within the action area to tackle both climate and bio-diversity emergencies.

Scottish Water also strongly recommends the inclusion of sustainable surface water management principles and plans to inform and influence the design and planning process for new developments and extend into the existing urban environment.

We will continue to work in partnership with the Local Authority, SEPA, developers and landowners to support the delivery of nature-based mitigations and blue-green infrastructure.

East Renfrewshire Council Response

In response to Nature Scots request that information is provided on the green and blue infrastructure projects in Figure 1 and 2, this information has now been added to the evidence paper as a map link at figures 1 and 2 which identifies which type of project is at each location.

The Council welcomes commitments to the integration blue-green infrastructure with new housing and agrees that the planning service should be open to consideration of innovative and flexible approaches to delivering green/blue infrastructure. The comment that the Council should determine where the green/blue infrastructure need is noted but the Council would suggest that developers also bring forward their own proposals and this is an area for collaboration.

The Council notes Scottish Waters comments on the benefits of partnership when delivering blue/green infrastructure. In response to Scottish Water's suggestion a reference and a link to the Scottish Governments 'Water Resilient Places' Policy Document has been added to the Evidence Topic Paper.

Statements of Dispute

Homes for Scotland, ICENI on behalf of The Mac Mic Group; Iceni on behalf of East Renfrewshire Home Builder Consortium (Mac Mic Group; Miller Homes; Robertson Homes; Taylor Wimpey), Taylor Wimpey, Miller Homes, ICENI on behalf of the Baird Family, Cala Management Ltd (CALA)

Consider there are significant gaps in the evidence.

The Council should determine where the locational need and types of development can contribute to infrastructure. There is a need for a Strategy to regularly monitor and maintain green and blue infrastructure and to keep up to date. There is a need for the Council to Communicate with developers on what infrastructure needs are necessary for the area.

The delivery of high quality blue and green infrastructure (BGI) is a priority for HFS members with significant investment often made in incorporating green spaces into new developments. It is positive that the Topic Paper recognises developers are gaining skills and confidence in the area of BGI.

The Open Space Audit 2016 and updated in 2023 to include open spaces created within development must be fully revised. This will assist developers in understanding the existing

provision and then allow masterplans to address deficiencies and spatially locate green infrastructure in masterplans and design briefs for new development. ERC must be flexible and open to innovative solutions to create and enhance blue/green infrastructure.

New blue/green infrastructure should be useable (where safe) and contribute to biodiversity. In terms of providing new and enhancing blue/green infrastructure, this topic paper is intrinsically linked with the Biodiversity and Natural Places, Woodland and Forestry, Greenbelt topic papers as well as opportunities within the Housing and the Placemaking topic paper. Findings and key issues for LDP3 must reflect findings of the related papers.

The Topic Paper notes that NPF4 Policy 20c is not covered in LDP2. The strategic location of Dams to Darnley Country Park requires that the implications of this new policy requirement should be considered in LDP3.

It is important for LDP3 to recognise that alongside matters relating to BGI, other factors must also be taken into consideration including marketability and deliverability.

Further consideration should be given to the opportunities presented on green belt land to enhance green infrastructure offering.

The Scottish Biodiversity Strategy states new developments can contribute to the enhancement of biodiversity through multi-functional nature-based solution using blue and green infrastructure to bring positive biodiversity effects but also provide habitats and wildlife with vital connectivity.

SEPA

The NPF4 instructions for LDPs on blue and green infrastructure states that:
The spatial strategy should identify and protect blue and green infrastructure assets and networks; enhance and expand existing provision including new blue and/or green infrastructure. This may include retrofitting.

Topic Paper 17 contains mapping of some aspects of blue and green infrastructure. The 'Implications for LDP3' states that work to identify opportunities for green infrastructure would most effectively be achieved by an up-to-date open space strategy. There is no reference to any identification or mapping of blue infrastructure assets and blue green networks to address the requirement of NPF4 above.

The river network and other water environment features, such as wetlands, are key elements of blue infrastructure in existing and proposed blue/ green networks. The comments on the nature of functioning riparian corridors also applies to blue and green infrastructure. The absence of a commitment to identify and map water environment features as an aspect of blue green infrastructure and blue green networks is a gap in the evidence.

The sources of relevant information regarding the water environment referred to for Nature Networks above equally apply to blue and green infrastructure mapping.

East Renfrewshire Council Response

SEPA's suggestions for additional evidence on the water environment and blue infrastructure have been taken on board and the evidence suggested has been added to the topic paper with a series of links to sites with relevant links to information on the water environment.

The comments on the need to update the Open Space Strategy (OSS) are noted. Work has commenced updating the OSS audit and it is the intention to revise the OSS for the Proposed Plan stage.

Homes for Scotland, Cala Homes and Miller Homes note the implications of NPF4 Policy 20c which states development proposals in country parks will only be supported where they are compatible with the uses, natural habitats, and character of the park. The deliverability and marketability of proposals will be considered through the Site Assessment Framework.

All comments acknowledging the importance of BGI with commitments to deliver it within new developments are welcomed. The Council agrees that high quality new development and blue/green infrastructure go hand in hand and this is best achieved with a collaborative approach.

Gate Check

The Council is of the view that there are no areas of dispute to be considered at Gate Check for this topic.

<p>East Renfrewshire LDP3 Issue: Topic Paper 018 - Play Recreation & Sport</p>	<p>NPF4 - Liveable Places Policy 21: Play recreation & Sport</p>
<p>Information required by the Act regarding the issue addressed in this section</p>	<p><u>2019 Planning (Scotland) Act</u></p> <p>Section 16D(1)</p> <ul style="list-style-type: none"> • a planning authority must assess the sufficiency of play opportunities in its area for children in preparing an Evidence Report. <p>The Town and Country Planning (Play Sufficiency Assessment)(Scotland) Regulations 2023 set out:</p> <ul style="list-style-type: none"> • the form and content of the Play Sufficiency Assessment (PSA); • the persons who must be consulted in preparing the PSA; and • the publication of the PSA. <p>Regulation 9: Have regard to any open space strategy.</p> <p>Other Statutory requirements</p> <ul style="list-style-type: none"> • Forestry and Woodland Strategy
<p>Links to Evidence</p>	<ul style="list-style-type: none"> • Scottish Government - National Planning Framework 4 (NPF4) 2023 (CD 102) • East Renfrewshire Play Sufficiency Assessment (PSA) (CD 260) • East Renfrewshire location of formal play spaces (CD 291) • Open Space Asset Management Plan 2023-2028 (CD 259) • Scottish Index of Multiple Deprivation 2020 (CD 127) • NHS Greater Glasgow and Clyde 2022/23 Adult Health and Wellbeing Survey (CD 188) • Scottish Household Survey 2022 (CD 126) • Sport Scotland National Trends in Sport Participation (CD 053) • Sport Scotland facilities map (CD 294)

- East Renfrewshire Playing Pitch Strategy & Action Plan (CD 199)
- East Renfrewshire Community Sports Hubs (CD 219)
- East Renfrewshire Core Path Plan (CD 220)
- East Renfrewshire - Open Space Audit (CD 197)
- SD001 - Site Assessment Framework

Summary of Evidence

The evidence considers the provision of facilities for sport and outdoor recreation covering sports pitches, urban parks, children’s play spaces, and rural country parks.

The evidence includes the findings of the Play Sufficiency Assessment (PSA) which is required under Section 16 D of the Planning (Scotland) Act 2019.

Section 1 considers the findings of The Play Sufficiency Assessment (PSA) produced in 2023 using the results of community engagement and workshops in schools. The PSA is required to assess the quantity, quality and accessibility of formal and informal play opportunities across the entirety of authority and at neighbourhood level. The results showed an unequal distribution of play opportunities with the Levern Valley well provided for but large areas of Eastwood with poor provision. The details are provided in a series of maps and tables.

Section 2 details the area of land (389ha) available for sport and recreation and provides a breakdown of how this land is used. This includes all East Renfrewshire Council parks and sports pitches; sports facilities are managed by East Renfrewshire Culture and Leisure Trust. Golf courses are a significant land –use in the urban/urban fringe area and make up almost half of the 389ha total of recreational land.

Section 2 focuses analysis on the accessibility of outdoor recreational space using the metric of a 10-minute walk time to a recreational space, analysis includes identifying those neighbourhoods with poor access.

Section 3 provides statistics on the health profile of East Renfrewshire residents, highlighting that health is generally good but with some pockets of poor health persist. The health profile is accompanied by a physical activity profile showing that residents generally meet physical activity targets. The evidence identifies the rate of participation by activity, showing that walking is by far the most popular form of physical exercise.

Section 4 looks specifically at sport pitches; the number, surface, distribution and use. Currently there is an insufficient supply of pitches for football, rugby, tennis and cricket. There are enough training/match game surfaces for hockey and athletics, but the two active clubs Giffnock Hockey Club and Giffnock North Athletic Club have no facilities to store equipment.

The informal and rural recreational resource used by walkers and cyclists is covered by descriptions of facilities and numbers visiting Dams to Darnley Country Park, Whitelee Access Project and the Core Path Network.

The LDP3 Evidence Report SEA Scoping Report (April 2024) defines the scope/level of detail to be covered in the Environmental Report for the Proposed Plan. Section 4 provides an overview of the environmental characteristics of East Renfrewshire. Table 2 sets out the SEA objectives relating to each SEA theme. Sport and recreation is covered under the Population and Place theme.

Summary of stakeholder Engagement

Section 4 'Engagement Statement' of the Evidence Report summarises the various engagement and consultation activities that have been undertaken to inform the Evidence Report. This includes collaborative working with Key Agencies and other stakeholders in the preparation of Topic Papers and the Play Sufficiency Assessment, and other place-based engagement and workshops.

A series of Topic Papers were prepared structured around the sustainable, liveable and productive places themes of National Planning Framework 4.

Wider external engagement with stakeholders commenced on 12th April and ended on 10th May 2024, inviting people interested in LDP3 to review the Topic Papers that cover their areas of interest and to share their comments. The aim of the engagement was to establish areas of agreement or disagreement and any additional evidence that should be taken into account.

The Topic Papers were published on the Council's Local Development Plan Hub on Commonplace, and through the Council's LDP3 website, Facebook and Twitter account and email notifications were sent to individuals and organisations listed on the LDP contact database.

The SEA Scoping Report was submitted to the SEA Gateway consultation authorities on 19th April for a 6-week consultation period. The Gateway Authorities were generally supportive of the Scoping Report subject to a few points for consideration for the Environmental Report to be prepared alongside the Proposed Plan. Comments are summarised in Section 4 Table 1 of the Evidence Report.

Summary of Implications for the Proposed Plan

The LDP will continue to support national legislation and policy protecting outdoor recreational assets. The LDP continues to have a key role to play in the overall protection of the outdoor recreational spaces and ensuring that policies and proposals are developed with consideration for other overlapping policy agendas such as health, climate change and biodiversity. Cowan Park provides a model example of a successful space which combines a formal Edwardian Park, large play area, tennis courts, synthetic and grass pitches, skate park, flood attenuation features and biodiversity rich wetland and woodlands.

Policies supporting NPF4 Policy 21 – will have to be balanced with competing interests while ensuring policies are complimentary with other agendas.

Design - The LDP should use masterplanning to consider how large new development proposals include appropriate levels of outdoor recreational and sporting facilities.

Appropriately scaled development contributions will be set to ensure resources are in place to meet the needs of an expanding population.

Site Assessment (SD 001) – the Playing Pitch Strategy (CD 199), Open Space Management Plan (CD 259) and Open Space Audit (CD 197) should be used to assess where new facilities should be located. Both grass and synthetic pitches are operating at capacity, but new pitches need large amounts of suitable land and must compete with other interests for valuable land.

Climate Change - Climate change and a focus on energy efficiency will lead to changes in how recreational open spaces are managed. Recreational open spaces have a role to play in climate mitigation and adaptation, such as natural flood prevention, carbon sequestration, and providing safe places or active travel routes.

The Play Sufficiency Assessment identifies an uneven distribution of play areas. LDP3 should address gaps in provision and ensure where new development occurs the right type of play spaces are installed in the right places.

Key issues for LDP3 to consider

- Sport pitches (grass & synthetic) operating at capacity.
- Pressure on Rouken Glen Park – 1.7m visitors a year
- Uneven distribution of children’s play spaces – 38% of homes not within 5 minutes’ walk
- Delivering the right play spaces in the right spaces in new development
- 20% of the population do not meet the recommended level of physical activity
- 10% of the population live in neighbourhoods with poor health
- Creating open spaces which are multifunctional rather than single use

Statements of Agreement / Dispute

Statements of Agreement

Scottish Water

Acknowledge the importance of facilitating areas of play, recreation and sport when delivering livable places within the local catchment area and support and endorse East Renfrewshire Council’s acknowledgement that climate change mitigation and adaptation measures must be incorporated when planning for these spaces and looking at opportunities to deliver solutions to existing areas. Pledge to continue to work with the Local Authority, SEPA, developers and landowners to support the delivery of nature-based mitigations and blue-green infrastructure.

Sportscotland

Agree broadly with the evidence. Sportscotland stresses the need to understand existing resource and community needs, potentially using a wider open space strategy to gather evidence with which to inform spatial policy development. East Renfrewshire has an Indoor Sports Facilities and Pitches Strategy 2018-2028 and various documents relating to Open Space. We note the pitches strategy is referenced within the topic paper, however indoor spaces for sport, both public and private, are not covered and it is important these facilities are considered.

Sportscotland note that the focus is largely on Council-owned facilities, there will be privately owned sites contributing active space for sport to which NPF4 policy considerations will also apply. The data from our facilities database will be available on the Improvement Services Spatial Hub shortly. Meantime, we can provide an extract of East Renfrewshire data should this be helpful.

Sportscotland suggest that when considering the existing and future of spaces for sport, consultation with people and clubs is a vital part of the process and we encourage engagement with sporting communities. Engagement should include Community Sport Hubs (CSH) which are collectives of local sports clubs and other community organisations which come together to improve the contribution that sport and physical activity has on a community.

Sportscotland state that they can undertake Facility Planning Modelling for various sports facilities. This can help identify potential deficiencies in facility provision in an area and identify the sports facility requirements of development proposals. Sportscotland state that they can provide a summary of sports halls, swimming pools and synthetic pitches for East Renfrewshire to include in the evidence base.

Sportscotland point to information on a range of national sport trends on their webpage and are happy to discuss any of these areas with you as the LDP3 develops.

ICENI on behalf of the Baird Family

Agree Broadly with the Evidence. It is acknowledged that appropriately scaled development contributions will be set to ensure resources are in place to meet the needs of an expanding population. Policy and guidance created as part of LDP3 should ensure that requirements for development contributions for play and open space reflect the tests under Section 75 of the Town and Country Planning (Scotland) Act 1997 (as amended) and the requirement for sites should be based on demonstrated need and demand in the community. A Play Sufficiency Assessment was produced, and Open Space Asset Management Plan have both recently been prepared in 2023.

East Renfrewshire Council Response

The Council welcomes the collaborative approach suggested by Scottish Water

The Council notes Sportscotland's comments that there is the lack evidence on privately owned sports spaces, Community Sport's Hubs, and indoor sports spaces. This has now been rectified with new evidence and links added to the paper as suggested by Sportscotland. The offer by Sportscotland to undertake Facility Planning Modelling is welcomed.

The Baird Family's comments on the use of development contributions for play and recreation are noted. This topic is covered in Topic Paper 14 Infrastructure First. The Council's Development Contribution guidance will be fully reviewed and updated for LDP3. This review will include an up-to-date assessment of existing infrastructure capacity and future requirements resulting from agreed development proposals in the Proposed Plan. Consideration will also be given to the thresholds and types of development to which the policy will apply.

Statements of Dispute

Public - Rachel Wright, Akhil Rane, Razavan Syyed, Richard Townsley, Catriona Townsley

Agree broadly with the evidence. Agree that infrastructure for sport is important. However, there is insufficient cricket resource in the area – investment required developing facilities for the cricket club. Cricket Pitches at Woodfarm need improvement

Iceni on behalf of The Mac Mic Group, ICENI on behalf of East Renfrewshire Home Builder Consortium (Mac Mic Group; Miller Homes; Robertson Homes, Taylor Wimpey)

There are significant gaps in the evidence. It would be beneficial to update The Open Space Audit. This will assist developers in understanding the existing provision and then allow masterplans to address deficiencies and spatially locate green infrastructure in masterplans and design briefs for new development.

There needs to be a clear link between the availability of opportunities for play, recreation and sport and local living. We wish to note new developments can provide an opportunity to shape and improve places. This can be done by augmenting current community facilities with new playgrounds and sport facilities to best meet the needs of local people in place. New residential development can also contribute to the vitality and sustainability of current community facilities, often through additional investment and spending in local services. The benefits of new development should not be underestimated.

This topic paper is intrinsically linked with the Biodiversity and Natural Places, Woodland and Forestry, Greenbelt topic papers and opportunities within the Housing and Placemaking topic papers. Findings and key issues for LDP3 must reflect and address the findings of the related papers.

East Renfrewshire Council Response

Work has started to update the Open Space Audit and The Open Space Strategy (OSS) will be revised to inform the Proposed Plan stage of the LDP3 process.

The Council agrees that new development can be an opportunity to shape and improve places when the right development is in the right place.

The Council agrees there are frequent policy/issue crossovers between topic papers. LDP3 will not consider topic papers in isolation but will be informed by considering the evidence as a whole.

The Council acknowledges comments on the sufficiency of cricket facilities in the district. The Sports Pitch Strategy, Openspace Asset Management Plan and Openspace strategy will be used to guide any decisions relating to cricket provision. The consideration of the need for and location of any new sports pitches and sports pavilions will take place at the Proposed Plan stage.

Gate Check

The Council is of the view that there are no areas of dispute to be considered at Gate Check for this topic.

<p>East Renfrewshire LDP3 Issue Topic Paper 019 - Strategic Flood Risk Assessment and Water Management</p>	<p>NPF4 - Liveable Places Policy 22: Flood Risk and Water Management</p>
<p>Information required by the Act regarding the issue addressed in this section</p>	<p><u>2019 Planning (Scotland) Act</u></p> <p>Section 15(5):</p> <ul style="list-style-type: none"> • The principal physical and environmental characteristics of the district. <p>Regulation 9 - Have regard to:</p> <ul style="list-style-type: none"> • any river basin management plan; • any flood risk management plan; and • any local flood risk management plan.
<p>Links to Evidence</p>	<ul style="list-style-type: none"> • National Planning Framework 4 (NPF4) 2023 (CD 102) • SEPA's Guidance for planning authorities on Strategic Flood Risk Assessment (CD 153) • East Renfrewshire SFRA Map (CD 268) • Flood Risk Management (Scotland) Act 2009 (CD 022) • Clyde and Loch Lomond Local Flood Risk Management Plan (2021) (CD 169) • River Basin Management Plan (2021 - 2027) (2021) (CD 141) • Scottish Government Sustainable flood risk management guidance (2011) (CD 116) • Scottish Water Climate Change Adaptation Plan 2024 (CD 134) • SEPA Natural Flood Management Maps (CD 147) • SEPA Guidance on Climate Change Allowances for Land Use Planning (CD 145) • East Renfrewshire State of the Environment Report (2019) (CD 271) • SEPA Reservoir Inundation Map (CD 148) • SEPA (2018) National Flood Risk Assessment (CD 143) • Clyde and Loch Lomond Local Plan District Flood Risk Management Plan (2021) map (CD 170) • Clyde and Loch Lomond Local Plan District Local Flood Risk Management Plan 2022 – 2028 (Cycle 2) (CD 175)

- [Scottish Water Strategic Plan \(CD 137\)](#)
- [RBMP3 - Water Environment Hub \(CD 140\)](#)
- SEPA [river classifications \(CD 152\)](#)
- East Renfrewshire [adopted Local Development Plan 2 \(March 2022\) \(CD 206\)](#)
- East Renfrewshire [Green Network Supplementary Guidance \(June 2023\) \(CD 204\)](#)
- Site Assessment Framework (SD 001)

Summary of Evidence

The purpose of this Topic Paper is to provide an overview of the Council’s Strategic Flood Risk Assessment (SFRA), the water resource and water management and the role of Scottish Water is also provided.

Section 1 describes the role of the Council’s Strategic Flood Risk Assessment (SFRA). The SFRA provides a strategic overview of flood risk across East Renfrewshire, identifies areas subject to flood risk and involves the collection, analysis and presentation of all existing and readily obtainable information on flood risk sources. The SFRA will inform decision making about preferred site allocations and will be crucial in identifying potential spatial options for the Proposed Plan.

Section 2 provides an overview of the SFRA map and the various layers and sources used.

Section 3 provides an overview of the legislative and policy context as provided by the Flood Risk Management, Sustainable flood risk management guidance (Scotland) Act, Flood Risk management plans, River Basin Management Plan, NPF4 and the Scottish Water Climate Change Adaptation Plan.

Section 4 describes the aims and objectives of the SFRA. The primary aim of the SFRA is to help inform LDP3 by delivering the intention of NPF4 Policy 22 to strengthen resilience to flood risk by promoting avoidance as a first principle and reducing the vulnerability of existing and future development to flooding.

Section 5 outlines the various sources that have informed the SFRA.

Section 6 provides an overview of flood risk in East Renfrewshire and highlights areas subject to potential flooding. It describes the main potential sources of flood risk as: rivers (fluvial) surface water (pluvial) and groundwater, drainage, sewers and infrastructure failure (e.g. reservoir breaches).

Section 7 describes historical flooding events in East Renfrewshire. Within East Renfrewshire there are small pockets of surface water flooding spread across the rural and urban parts of the Council area. Surface water is a potentially significant issue, and various watercourses have and will continue to cause flooding issues and potentially impact development.

Section 8 describes existing flood defence schemes including the White Cart Flood Prevention Scheme and the Levern Water project in Barrhead.

Section 9 describes flood management practices such as Scottish Water have invested in a major project to help reduce the risk of sewer flooding in Giffnock.

Section 10 describes Scottish Waters plans for the future provision of water through a sustainable water resource management approach. An overview of the water resource in East Renfrewshire and climate change risks to this are highlighted, Scottish Water capacity data for Water Treatment Works and Wastewater Treatment Works is shown and areas for investment highlighted. Water quality and river classification data is shown.

Section 11 outlines the impacts of climate change on flood risk. The implementation of sustainable water management techniques in working towards reduction, adaptation and mitigation of the impacts from climate change are discussed with reference to local examples. Climate change allowance data up-to 2080 is described.

Section 12 provides a link to the Councils Site Assessment Framework document that will be used to assess sites for inclusion at Proposed Plan stage.

Section 13 describes some of the limitations with the data and future flood studies that require to be undertaken.

Section 14 sets out the implications for LDP3, which have been informed by the analysis and outputs in the report.

The LDP3 Evidence Report SEA Scoping Report (April 2024) defines the scope/level of detail to be covered in the Environmental Report for the Proposed Plan. Section 4 provides an overview of the environmental characteristics of East Renfrewshire. Table 2 sets out the SEA objectives relating to each SEA theme. Flood Risk and Water Quality is covered under the Landscape and Water themes.

Summary of Stakeholder Engagement

Section 4 'Engagement Statement' of the Evidence Report summarises the various engagement and consultation activities that have been undertaken to inform the Evidence Report. This includes collaborative working with Key Agencies and other stakeholders in the preparation of Topic Papers and the Play Sufficiency Assessment, and other place-based engagement and workshops.

A series of Topic Papers were prepared structured around the sustainable, liveable and productive places themes of National Planning Framework 4.

Wider external engagement with stakeholders commenced on 12th April and ended on 10th May 2024, inviting people interested in LDP3 to review the Topic Papers that cover their areas of interest and to share their comments. The aim of the engagement was to establish areas of agreement or disagreement and any additional evidence that should be taken into account.

The Topic Papers were published on the Council's Local Development Plan Hub on Commonplace, and through the Council's LDP3 website, Facebook and Twitter account and email notifications were sent to individuals and organisations listed on the LDP contact database.

The SEA Scoping Report was submitted to the SEA Gateway consultation authorities on 19th April for a 6-week consultation period. The Gateway Authorities were generally supportive of the Scoping Report subject to a few points for consideration for the Environmental Report to be prepared alongside the Proposed Plan. Comments are summarised in Section 4 Table 1 of the Evidence Report.

Summary of Implications for the Proposed Plan

The Strategic Flood Risk Assessment (SFRA) has been discussed and generally agreed by Scottish Water and SEPA. Through LDP3 the Council will develop a place-based approach to support infrastructure requirements and work collaboratively with Scottish Water, SEPA and other partners to plan new development so that it does not lead to supply issues or issues with the treatment of wastewater and will contribute towards a more resilient water supply for future generations.

The SFRA has been carried out with the main aim of assisting the preparation of LDP3, particularly in regard to making decisions about preferred site allocations. It takes into account the aims of NPF4 Policy 22 Flood Risk and Water Management and forms the basis as a core component of the Site Assessment Framework. The Council will also continue to explore the effectiveness and deliverability of all sites currently included within the adopted LDP2, including exploring whether flood risk is a constraint to development.

It also takes into account the Flood Risk Management Plan Clyde and Loch Lomond Local Plan District (2021) and Clyde and Loch Lomond Local Plan District Local Flood Risk Management Plan 2022 – 2028 (Cycle 2) (2022), the Local Flood Risk Management Plan for the Clyde and Loch Lomond District (2022) and the River Basin Management Plan for Scotland 2021 – 2027 (2021).

Areas of flood risk shown on the [SFRA Map](#) include pockets within Barrhead, Thornliebank, Newton Mearns, Busby and Giffnock and will be avoided when identifying site allocations for LDP3.

Statements of Agreement / Dispute

Statements of Agreement

SEPA

We support the undertaking of a SFRA. The SFRA clearly outlines the purpose, the data used, links with key policy or legislation, considers all flood sources and identifies current flood defences within the region. We are satisfied that the SFRA GIS Map includes all relevant flooding information that is readily available.

Scottish Water

Acknowledge that previously provided comments from April 2024 on the initial draft of the Topic Paper have been included within the revised draft Topic Paper.

Homes for Scotland, ICENI On behalf of East Renfrewshire Home Builder Consortium (Mac Mic Group; Miller Homes; Robertson Homes; Taylor Wimpey), ICENI on behalf of The Mac Mic Group, Miller Homes,

The responses state that it is positive that the Topic Paper states there will be a continual review of the effectiveness and deliverability of all sites currently included within the adopted LDP2, including exploring whether flood risk is a constraint to development. Ensuring there is a deliverable land pipeline within LDP3 will help assist in meeting the Councils Minimum All Tenure Housing Land Requirement. It is welcomed that the document is generally agreed by Scottish Water and SEPA.

East Renfrewshire Council Response

The Council acknowledges and welcomes the supporting comments received and that SEPA and Scottish Water are supportive of the contents of the SFRA. Flood risk is a key criteria within the Site Assessment and Strategic Environmental Assessment.

Statements of Dispute

SEPA

We are satisfied that the SFRA is acceptable subject to:

1. The Natural Flood Management (NFM) Maps and flood defence information be made available for internal council use to support the SFRA, inform the emerging LDP and associated site assessment.
2. Renaming the layers in the map tool so they are consistent with SEPA datasets where relevant to reduce any confusion for users. This particularly applies to the 'Forward Planning' layer which should refer to the 'Future Flood Maps'.
3. On pages 2 and 15 of the Topic Paper, removing reference to 'significant flood risk' as this does not correspond with the current terminology used in NPF4 and could also therefore give rise to confusion.
4. Reservoir flooding should be a separate category and not included within river (fluvial) flooding.
5. Reservoir flooding should generally be viewed as infrastructure failure. If the reservoir volume is more than 25000m³ this would likely be shown within the SEPA reservoir inundation maps.
6. Section 11 refers to the SEPA Indicative River and Coastal Flood Maps. These have now been updated to include pluvial or surface water flooding and now referred to as SEPA Flood Maps (version 2.1).

Water environment - The RBMP3 - Water Environment Hub has not been used to inform the environmental baseline of the Evidence Report. The RBMP3 - Water Environment Hub contains the data that underpins the current RBMP and is identified as a relevant source of information for Policy 22. Data on key pressures available from the RBMP3 - Water Environment Hub should inform the environmental baseline of the Evidence Report along with the most recent water classification data. We note classification data is included in the Topic Paper. The RBMP3 - Water Environment Hub data may highlight pressures in the water environment which the LDP could help address through identification of opportunities to improve the water environment in nature network/ blue green infrastructure mapping or in proposed development.

Scottish Water

Request the following amendment be made to the section on page 11 under the heading 'Water Treatment Works and Wastewater Treatment Works Capacity' where it discusses Scottish Water data on potential future investment:

'It is a requirement of Scottish Water to identify and provide new strategic capacity that will meet the demand of all new housing development and the domestic requirements of commercial and industrial development forecasted by East Renfrewshire Council. Scottish Water will continue to work with the Local Authority to provide the required capacity at the Water and Wastewater Treatment Works that serve the local catchment area to meet known growth requirements, just ahead of need. Factors such as the total number of proposed developments, their scale and their distance from the Treatment Works may result in potential future growth investment being required. Where so, Scottish Water will engage with East Renfrewshire Council to gain a better understanding of the future proposed developments (scale and location) which will inform strategic plans to identify where future growth investment priorities are and support a flourishing Scotland'.

Homes for Scotland, ICENI On behalf of East Renfrewshire Home Builder Consortium (Mac Mic Group; Miller Homes; Robertson Homes; Taylor Wimpey), ICENI on behalf of The Mac Mic Group, Miller Homes, ICENI on behalf of The Biard Family

In accordance with NPF4 the Topic Paper notes that avoidance applies to all flood risk areas, unless supported by NPF4 Policy 22a, rather than solely areas at significant flood risk. As it is for the Council, not SEPA, to determine whether an application falls into one of the exceptions set out in Policy 22a, it is vital that the Council consider housing under 'essential infrastructure'.

The Topic Paper states there are areas of significant flood risks in Barrhead, Thornliebank, Newton Mearns, Busby and Giffnock and will be avoided when identifying site allocations for LDP3. Whilst we support this approach when, it comes to areas of high risk, the SFRA Map also includes areas where there is low risk of flooding. Do not agree that areas of significant flood risk should be entirely avoided when identifying site allocations for LDP3. If housing is not considered as 'essential infrastructure' by the Council, this could have profound implications for economic growth and development opportunities in marketable locations.

It is important to note that through the LDP process, homebuilders carry out due diligence, including technical and marketability assessments, before submitting a site for consideration. This is a clear indicator of where new homes can be successfully delivered.

With regards to the climate and nature emergency, local authorities and developers alike must be adaptable and promote innovative engineering to ensure future development does not increase risk of flooding. NPF4 Policy 22 part E states that Development proposals which create, expand or enhance opportunities for natural flood risk management, including blue and green infrastructure, will be supported. Therefore, it is prudent that ERC promote innovative engineering in terms of drainage and flood mitigation.

Any policy needs to recognise that there are tools which can be utilised to mitigate existing and future flood risk. It would be helpful for the Topic Paper to recognise that such risks can be controlled through the preparation of a Construction Environment Management Plan.

Response from the Baird Family acknowledges that that a preventative approach to flooding is promoted by the Council. Mitigation measures should be taken into account when deciding whether to allocate sites that may be at risk of flooding and more detailed analysis of flood risk should be required to decide where it is appropriate for development to be located.

East Renfrewshire Council Response

In response to the additional points made by SEPA the Council responds as follows:

1. The Council confirms that the Natural Flood Management (NFM) Maps and flood defence information be made available for internal council use.
2. SFRA layer details updated as requested.
3. References to 'significant flood risk' have been removed and reworded 'flood risk'.
4. Reservoir flooding is a separate category within section 6 of the paper. Reservoir inundation maps are only available to view online, the council does not have a GIS layer with reservoir information.
5. Reservoir flooding is acknowledged as infrastructure failure under section 6 of the topic paper.
6. References in section 11 to SEPA Flood Maps have been added.

A summary of the RBMP3 - Water Environment Hub and a link to the maps have been added to the Topic Paper.

The amendment proposed by Scottish Water has been incorporated into the Topic Paper as requested.

The Council disagrees with HFS that housing should be classified as essential infrastructure under Policy 22a. The Council will use the SFRA, Site Assessment, SEA and other supporting SEPA maps to inform the identification of sites for LDP3.

The Council notes that developers will undertake technical assessments to mitigate existing and future flood risk before submitting a site for consideration. The submission of a Flood Risk Assessment is highlighted in the Site Assessment Framework and section 12 of the topic paper.

The Council is supportive of natural flood risk management solutions as set out within section 11 of the topic paper and the LDP2 Green Network Supplementary Guidance.

Gate Check

The Council is of the view that there are no areas of dispute to be considered at Gate Check for this topic.

<p>East Renfrewshire LDP3 Issue: Topic Paper 020: Health and Wellbeing</p>	<p>NPF4 – Liveable Places Policy 18: Infrastructure First Policy 23: Health and safety</p>
<p>Information required by the Act regarding the issue addressed in this section</p>	<p>2019 Planning (Scotland) Act</p> <p>Section 15(5):</p> <ul style="list-style-type: none"> • the size, composition, health and distribution of the population of the district; • the health needs of the population of the district; • the infrastructure of the district (including health care facilities); and • how that infrastructure is used. <p>Regulation 9 - Have regard to:</p> <ul style="list-style-type: none"> • location of Control of Major Accident Hazard establishments and / or pipelines. <p>Other Statutory Requirements:</p> <ul style="list-style-type: none"> • Air Quality Action Plans for Air Quality Management Areas
<p>Links to Evidence</p>	<ul style="list-style-type: none"> • East Renfrewshire 2022 Citizens Panel (CD 214) • NHS Greater Glasgow and Clyde 2022/23 Adult Health and Wellbeing Survey (CD 188) • East Renfrewshire HSCP Profile 2020-21 (CD 281) • Eastwood Locality summary 2020-21 (CD 282) • Barrhead Locality summary 2020-21 (CD 280) • National Planning Framework 4 (NPF4) 2023 (CD 102) • East Renfrewshire adopted Local Development Plan 2 (March 2022) (CD 206) • East Renfrewshire Fairer East Ren' Plan (CD 236) • East Renfrewshire Locality Plans (CD 257) • East Renfrewshire adopted Development Contributions Supplementary Guidance (June 2023) (CD 203)

- Scottish Government's Cabinet Secretary for Health and Sport and Minister for Local Government, Housing and Planning (CD 120)
- [Scottish Index of Multiple Deprivation 2020](#) (CD 127)
- [AHAH \(the index of 'Access to Health Assets and Hazards'\)](#) (CD 296)
- East Renfrewshire [Social Justice Framework](#) (CD 269)
- East Renfrewshire [Social Justice Strategy \(2023-2026\)](#) (CD 270)
- [Arthurlie, Dunterlie and Dovecothall Locality Plan](#) (CD 191)
- [Auchenback Locality Plan](#) (CD 192)
- [East Renfrewshire Children's Plan \(2023-26\)](#) (CD 213)
- [School Healthy Living Survey Statistics](#) (CD 104)
- East Renfrewshire [Food Growing Strategy 2023](#) (CD 238)
- Food Standards Scotland '[Out of Home Environment](#)' (OOH) (CD 025)
- [The out of home environment in Scotland \(2021\)](#) (CD 023)
- [Total food and drink landscape in Scotland in 2021](#) (CD 024)
- [Priority Places for Food Index](#) (CD 295)
- East Renfrewshire [Air Quality Annual Progress Report \(2023\)](#) (CD 207)
- [East Renfrewshire GPs - Condition Prevalence](#) (CD 241)
- [Air Quality in Scotland \(2023\) Glasgow Waulkmillglen Reservoir](#) (CD 082)
- EU [Environmental Noise Directive](#) (CD 020)
- [Glasgow Agglomeration Noise Action Plan](#) (CD 174)
- [Strategic noise maps](#) (CD 092)
- [NRS Probable suicides 2022, Report](#) (CD 048)
- East Renfrewshire [Capital Investment Strategy 2023](#) (CD 211)
- East Renfrewshire [General Fund Capital Plan 2023](#) (CD 239)
- East Renfrewshire [Community Plan \(2018-28\)](#) (CD 217)
- East Renfrewshire [Community Planning and Fairer East Ren Annual Report 2022-2023](#) (CD 218)

	<ul style="list-style-type: none"> • East Renfrewshire HSCP Strategic Plan (2022-25) (cd 246) • East Renfrewshire HSCP Annual Performance Report 2023/24 (CD 244) • East Renfrewshire HSCP Integration Joint Board Accommodation Strategy (June 2023) (CD 245) • East Renfrewshire draft Primary Care Estate Strategy (CD 231) • Public Health Scotland GP Practice Contact Details and List Sizes (CD 072) • Independent Review of Adult Social Care in Scotland (February 2021) (CD 040) • 2023 Scottish Care Home Census (CD 095) • Planned housing development in East Renfrewshire: measuring impact on GP practice populations' (CD 194)
--	--

Summary of Evidence

The purpose of this topic paper is to provide background information on the subject of health and wellbeing in relation to the development of East Renfrewshire. This topic paper looks at the issues which influence the health and wellbeing of local residents and looks at the key drivers for change that will improve the health and wellbeing of the area. Considerable work has already been undertaken to better understand the social care infrastructure requirements across the Council area. Further analysis will be required once the spatial distribution of development is agreed through the Proposed Plan stage of LDP3.

The topic paper also discusses current policies and guidance regarding health and planning. There are a multitude of factors that can impact on both health and wellbeing however this Topic Paper focuses on those areas where the LDP can have an influence. East Renfrewshire faces a number of health challenges and inequalities in which planning and place making has an important role to play.

Health Infrastructure Planning covers a wide range of activities, from broad strategic assessments of health and other infrastructure needed to support population growth and new residential development across the Council area, to how planning and development can contribute to broader health objectives through the development of detailed master plans and design briefs or the use of Health Impact Assessments.

Section 1 provides an overview of demographic and social trends, including an overview of local health profile data at local authority and locality geography, demographic projections and deprivation data.

Section 2 outlines the Policy Context as provided by NPF4 and the adopted LDP2.

Section 3 provides an overview of Health and wellbeing challenges. The LDP has a role in considering all aspects that impact on an individual's health and to help influence positive wellbeing outcomes across all parts of the Council area. This section illustrates examples of how

health and wellbeing can be considered throughout the LDP3 process, highlighting challenges and issues to be addressed. Information is provided for the following themes:

- Ageing population;
- Housing;
- Inequalities;
- Child Poverty and the Cost of Living;
- Transport and accessibility;
- Social and Health infrastructure;
- Healthy Environment;
- Healthy Eating;
- Air Quality;
- Noise; and
- Mental Health and Awareness of locations of concern for suicide.

Section 4 provides an overview of current East Renfrewshire Health and Social Care Partnership (HSCP) and related Strategies and the HSCP Property Estate as referenced in the evidence section above. This section also sets out the current infrastructure and properties across the Council area and current and future requirements as evidenced through the HSCP Accommodation Strategy and the Primary Care Estate Strategy.

Section 5 provides an overview of the Primary Care and Care Home Infrastructure. Data is provided on GP practices, patient numbers, GP clusters. The impact of East Renfrewshire's growing population on GP lists is also highlighted. This issue is discussed in more detail in Section 6. A summary of care home data is shown and the impact of recent planning decisions is highlighted as an issue to be monitored.

Section 6 assesses the implications of housing and population growth on future additional demand for, and provision of, health infrastructure and health services. It refers to a previous study in 2019 that looked at the impact of housing developments on GP lists. Reference is made to the need to develop a methodology and model to assess the impact of new sites promoted through LDP3 on GP practices at GP cluster geography.

Section 7 provides an overview of what infrastructure is currently planned as evidenced by the HSCP Accommodation Strategy.

Section 8 sets out the implications for LDP3, which have been informed by the analysis and outputs in the report.

The LDP3 Evidence Report SEA Scoping Report (April 2024) defines the scope/level of detail to be covered in the Environmental Report for the Proposed Plan. Section 4 provides an overview of the environmental characteristics of East Renfrewshire. Table 2 sets out the SEA objectives relating to each SEA theme which includes a section on Health and Well Being considerations within the climatic factors and the human health, air and hazards themes.

Regulation 9 of the Act requires the Evidence Report to have regard to the location of Major Accident Hazard establishments and / or pipelines. This matter is explored under Topic Paper 007: Brownfield, Vacant, Derelict and Contaminated Land.

Summary of Stakeholder Engagement

Section 4 'Engagement Statement' of the Evidence Report summarises the various engagement and consultation activities that have been undertaken to inform the Evidence Report. This includes collaborative working with Key Agencies and other stakeholders in the preparation of Topic Papers and the Play Sufficiency Assessment, and other place-based engagement and workshops.

A series of Topic Papers were prepared structured around the sustainable, liveable and productive places themes of National Planning Framework 4.

Wider external engagement with stakeholders commenced on 12th April and ended on 10th May 2024, inviting people interested in LDP3 to review the Topic Papers that cover their areas of interest and to share their comments. The aim of the engagement was to establish areas of agreement or disagreement and any additional evidence that should be taken into account.

The Topic Papers were published on the Council's Local Development Plan Hub on Commonplace, and through the Council's LDP3 website, Facebook and Twitter account and email notifications were sent to individuals and organisations listed on the LDP contact database.

The SEA Scoping Report was submitted to the SEA Gateway consultation authorities on 19th April for a 6-week consultation period. The Gateway Authorities were generally supportive of the Scoping Report subject to a few points for consideration for the Environmental Report to be prepared alongside the Proposed Plan. Comments are summarised in Section 4 Table 1 of the Evidence Report.

Summary of Implications for the Proposed Plan

This Topic paper has been discussed and agreed by the East Renfrewshire HSCP and planning services and other key internal partners. It is supported by evidence and reflects the wider Infrastructure considerations addressed in separate topic reports.

Through LDP3 the Council will develop a place-based approach to support infrastructure requirements and work collaboratively with the East Renfrewshire HSCP, NHS and other partners to address the health and well-being challenges and inequalities highlighted under Sections 2 and 4 of this Topic paper. The LDP should support the provision of interventions aimed at improving air quality, especially for pedestrians and cyclists.

The Property Estate Strategy highlights that although the East Renfrewshire area benefits from a majority of good/very good buildings, in strategically important delivery locations, all GP facilities are currently operating at or near capacity and are likely to be impacted in space terms by potential future LDP3 housing developments as well as further planned housing units emerging through LDP2.

The Council will work collaboratively with the East Renfrewshire HSCP and NHS Partners to undertake health care infrastructure modelling that reflects agreed programming for mixed use and residential site allocations identified through the Proposed Plan stage to ensure comprehensive healthcare solutions are implemented to generate the additional capacity required, including the requirement for planning obligations towards land and /or buildings required to create additional capacity within existing / new HSCP facilities. The calculation of

planning obligations will be undertaken at the GP cluster geography. A mixture of solutions may be utilised including optimising the use of current assets as outlined in the Property Estate and Accommodation Strategies, expansion and/or consolidation of existing GP practices and other HSCP buildings, use of temporary accommodation in the short term, and if necessary, possible identification of new health infrastructure provision within specific site allocations.

If new health facilities are required, the Council will encourage the co-location and integration of health care services, including potential for co-location of complementary services. A strategic approach addressing the healthcare requirements over a GP cluster should help avoid the piecemeal provision of healthcare facilities within development proposals.

The phasing and programming of residential and mixed-use sites will be a critical element of the LDP's approach to ensure land comes forward in a planned way; to provide a consistent supply of land over the plan period; and to ensure that any infrastructure requirements are delivered. However, the lack (and scale) of land options in Council ownership and the availability of funding remains a significant constraint to bringing forward any potential new sites for healthcare provision. The Council will also continue to investigate and identify potential opportunities within the existing urban areas together with an asset review of its own properties as part of this process. The Council's asset review is described further within the Infrastructure First Topic Paper.

Investment and funding will be considered and taken forward through the Council's Capital Investment Strategy, national sources of funding, and with the potential for planning obligations to be secured towards this infrastructure to be explored further.

The Council will also continue to monitor the occupancy rates, provision and distribution of care homes and impacts upon GP practices and existing HSCP existing health and care infrastructure. The application and content of Policy SG3 will be reviewed through the Proposed Plan stage.

Statements of Agreement / Dispute

Statements of Agreement

GrowGreen Scotland

Agree broadly with the evidence. Welcome the recognition of the contribution that food growing opportunities make to health and well-being. However, whereas it is stated that: Proposals should be able to fully show through planning applications and supporting information how health and wellbeing has been considered for people of all ages, abilities and backgrounds while demonstrating economic, social and environmental benefits. This should include opportunities for exercise, community food growing or allotments, we would like to see a much more robust approach taken.

In doing this, we believe that effective planning has an integral role to play in creating and maintaining opportunities for people to connect and work with nature, grow and distribute food, create local spaces for health and wellbeing, and build connections and preparedness for an uncertain future.

Opportunities for community gardens, food growth and allotments are expressly highlighted as one of the factors to take into account when assessing existing settlement patterns and the level and quality of interconnectivity of the proposed development, as required by Policy 15 of NPF. In addition to which, it should be recognised that the provision of community growing opportunities

also contributes to a number of other NPF4 policy aims, as well as aligning with other elements of national strategy.

The existing policy context in LDP2 is not as strong as it could be. And, while the general requirement for green infrastructure to be an integral part of development proposals is welcomed, this could be strengthened to better align with the national policy context about food growing.

There is of course a lot of good works already being done in East Renfrewshire, with a number of successful community growing related projects operating across the area, and support for the creation of more set out in the Councils draft Food Growing Strategy (as published in May 2023). Although, a year later, the Food Growing Strategy does not yet appear to have actually been adopted (a fact that does not appear to be acknowledged in the topic paper). And in any event, alongside the Food Growing Strategy, there is more that could be done to support the creation and maintenance of such projects in planning terms, with evidence to support the need for this provided in response to the next question below. One of the actions identified in the Strategy is for potential food growing spaces to be identified in the next Local Development Plan.

The response provides examples of other Local Authorities approach to this subject. This information will inform the Proposed Plan preparation and masterplans/development briefs for specific sites.

Scottish Water

Committed to supporting a flourishing Scotland through service excellence.

East Renfrewshire HSCP

Support the intention in the LDP to maximise greenspace and green infrastructure, and, in principle, the promotion of community gardens, allotments and other food growing spaces. The HSCP works to promote health and wellbeing including through healthy eating, exercise and outdoor activity. Although they do not have any specific remit around the promotion of food growing spaces, the HSCP continue to work in partnership with colleagues in the ER Culture and Leisure Trust for the promotion of physical activity among key population groups, and with ERC Departments including Education and Environment for the promotion of opportunities for exercise and active pursuits. HSCP also work closely with and contribute to the work of Voluntary Action East Renfrewshire and the Talking Points partnership who support people to access local community opportunities including community gardens.

East Renfrewshire Council Response

The Council acknowledges and welcomes the supporting comments received.

Grow Green Scotland's comments on alignment with national policy are noted. The Council is cognisant of the NPF4 policy in relation to supporting food growing activity. The Food Growing Strategy is due to be finalised and the revision of the Open Space Strategy is progressing. Both documents will provide an evidence basis for LDP3 to incorporate policy which supports NPF4 aspirations for food growing. The proposed plan stage will provide opportunities to consider proposals for food growing sites in detail.

Statements of Dispute

Scottish Water

Advocate for the further expansion of Green Blue Infrastructure - strongly recommend that this be incorporated when retrofitting existing homes as per Section 3.2 of the topic paper. The response states that potential for odour nuisance arising from new development close to Wastewater Treatment Works needs to be carefully evaluated.

Dr Jennifer May

Disagree with the evidence. Note that GP numbers are a head-count, not whole time equivalent. Whole time equivalent figures would be required to make any meaningful judgements on GP practice capacity (pg 28). There is mention of alcohol and drug services in St Andrew's house being moved to Barrhead Health Centre. We are already struggling for space, how is this going to be achieved?

While it is true that we have been given extra staff via PCIP funding in General Practice, the overall workload has not dropped to any significant extent. We have also struggled to accommodate these extra staff at times.

Williamwood Medical Practice

Disagree with statement that our practice (Williamwood Medical Practice) is operating at capacity. Evidence: significant space capacity within our premises that is unused, and previously planning permission was granted for 2 storey extension into car park space; July 2015, accepted, ref:2015/0514/TP. See also building warrant ref: 2021/0780/BW - creation of increased consultation rooms upstairs. As previous Improvement Grant funding was withdrawn in 2022, we were unable to proceed with this.

1. We have significant patient numbers overlapping with Eastwood 1 Cluster practice catchment areas, with G77 postcodes. We are concerned that if and when a Newton Mearns Health and Social Care Centre is built, we are likely to see a significant fall in our patient numbers, as patients will be interested in a brand-new facility. This would have a significant impact on the sustainability and stability of our practice.
2. We would like some assurance that the impact on our practice as above has been considered.

NHS Greater Glasgow & Clyde

It should be acknowledged that during the process for the LDP 2, NHSGGC strongly advocated for healthcare to be added to the list of infrastructure and services for which contributions may be sought. This was supported by the Reporter at examination. It is therefore pleasing to see the Council seek to further develop this point in LDP 3. The response highlights approaches to the subject from other Local Authorities including East Dunbartonshire and Glasgow. Through proactive engagement with the Council and HSCP, specific provisions were made in relation to developer contributions for healthcare in East Dunbartonshire.

Healthcare infrastructure across NHSGGC includes properties around the Board that provide primary healthcare services (including GPs, dentists, optometry, pharmacies), other community healthcare services (including mental health, addiction and sexual health services), and acute and

specialist healthcare services (hospitals). Therefore, the focus is not simply on GP's and is much wider.

Homes for Scotland, Miller Homes, ICENI On behalf of East Renfrewshire Home Builder Consortium (Mac Mic Group; Miller Homes; Robertson Homes; Taylor Wimpey), ICENI on behalf of The Mac Mic Group, ICENI on behalf of the Baird Family

HFS note that it is the Council's intention for the case for requiring development contributions towards healthcare infrastructure to be determined through future analysis and modelling following the identification of agreed residential site options through the Proposed Plan stage.

HFS disagrees with the principle of charging the homebuilding industry for the provision of healthcare facilities. The NHS as an organisation is funded through central government funding, and the burden should not be placed upon the development industry to cover any funding shortfall that may hinder the provision of primary healthcare facilities. Primary healthcare provision should not be for the Council to provide for, and this certainly should not be for developer contributions to meet the cost of the necessary facilities. Most surgeries act as businesses, and developers should not be expected to supplement other businesses. It appears that a key issue with healthcare provision is the lack of practitioners rather than physical facilities. This is a national issue and not something that can or should be solved by the Local Authority or developers. The delivery of more homes should be a national priority and the private homebuilding industry, which delivers the vast majority of new housing across Scotland, should be supported to increase the delivery of homes, rather than having increasing burdens placed upon it.

HFS is aware of cases in Aberdeenshire, who were an early adopter of contributions towards healthcare, where the contributions have been returned or reduced due to not being utilised. This highlights the need to ensure that any contribution meets the tests set out in Circular 3/2012 'Planning Obligations and Good Neighbour Agreements' and NPF4 Policy 18 – Infrastructure first. Including the tests in the latter ensures that compliance with these tests is now a policy matter and not a material consideration. Contributions should be subject to negotiation and development viability.

Provision of new homes has a positive effect on health and wellbeing and should be supported as such.

It requires to be understood how many GPs currently work on a part-time basis. Total GP numbers is a poor metric upon which to assess the overall availability, given not all GPs work full-time.

East Renfrewshire Council Response

As requested by Scottish Water the following amendments have been made to the Topic Paper:

- Wording on green blue infrastructure has been added to section 3.2.
- An additional section (3.11) on 'Development within Close Proximity to Wastewater Treatment Works' has been included.

Whole time equivalent numbers of GPs in GP Practices has been factored into the Property Strategy Report. This report identified potential space in Barrhead Health & Care Centre that could accommodate another service. A feasibility study is underway. PCIP staff are also included in local property strategy metrics.

The comments from Williamwood Medical Practice are noted. The topic paper does not specifically state that Williamwood is operating at capacity. It may be that these comments relate to the Property Estate Strategy which noted that 'all GP facilities are currently operating at or near capacity and are likely to be impacted in space terms by potential future LDP3 housing developments as well as further planned housing units emerging through LDP2'.

Impact on other Practices of any new facility in areas of housing growth will be considered.

Homes for Scotland's disagreement with the principle of charging the housebuilding industry for the provision of healthcare facilities is noted.

Policy 18 of NPF4 states that the impacts of development proposals on infrastructure should be mitigated and that development proposals will only be supported where it can be demonstrated that provision is made to address the impacts on infrastructure. Health and social care infrastructure and services, including both services provided in the community directly by Health Boards (and services provided on their behalf by contractors such as GPs, dentists and pharmacists) is specifically included in the Infrastructure First definition in NPF4.

The Local Development Planning Guidance states that where planning authorities intend to seek developer contributions for delivery of infrastructure, e.g. transport, health and education infrastructure, the approach to be set out in the LDP may benefit from being developed collaboratively with infrastructure providers.

As the Topic Paper sets out, the Council has committed to carry out future analysis with partners to consider the capacity required to support future demand for healthcare infrastructure.

The Council acknowledge that full time equivalent figures would be required to make any meaningful judgements on GP practice capacity; and this will be taken into account in the future analysis with partners to consider the capacity required to support future demand for healthcare infrastructure.

As stated in the Topic Paper, only if increased capacity is required in certain areas would consideration be given to requesting contributions for healthcare infrastructure. All planning obligations entered into would need to meet the tests of Policy 18 of NPF4. This is already a policy requirement of our existing LDP2 Strategic Policy 2 Development Contributions. To be clear it is anticipated that development contributions would only be sought for infrastructure delivery, in the form of land or buildings required for new or expanded HSCP owned facilities (or for the reconfiguration of internal space to provide additional capacity); not for the funding of health and care services such as new GPs or other health care roles; and not to directly benefit or supplement a private business.

The Comments from NHS Greater Glasgow & Clyde that Healthcare infrastructure across NHSGGC is much wider than just GPs is noted and this will be considered when assessing the impact of new development on healthcare infrastructure through LDP3.

Gate Check

The Council is of the view that agreement has not been reached on disputes regarding planning obligations towards healthcare infrastructure. This topic may require to be considered further by the Reporter.

<p>East Renfrewshire LDP3 Issue Topic Paper 021: Communications and Digital Infrastructure</p>	<p>NPF4 - Liveable Places Policy 24: Digital Infrastructure</p>
<p>Information required by the Act regarding the issue addressed in this section</p>	<p>2019 Planning (Scotland) Act</p> <p>Section 15(5):</p> <ul style="list-style-type: none"> • the infrastructure of the district (including communication systems); and • how that infrastructure is used.
<p>Links to Evidence</p>	<ul style="list-style-type: none"> • National Planning Framework 4 (NPF4) 2023 (CD 102) • East Renfrewshire adopted Local Development Plan 2 (March 2022) (CD 206) • Scottish Governments R100 Programme (CD 122) • The Connected Nations 2023: Interactive report (CD 156) • East Renfrewshire Economic Baseline Report (Feb 2024) (CD 232) • openreach ultrafast full fibre broadband build programme (July 2022) (CD 068) • Scotland Superfast Broadband (CD 076) • Ofcom Mobile and broadband checker (CD 062) • East Renfrewshire Economic Development Delivery Plan (CD 230)
<p>Summary of Evidence</p>	
<p>The purpose of this Topic Paper is to provide background information on the subject of digital infrastructure in relation to the development of East Renfrewshire. This Topic Paper looks at the issues which influence the provision of digital infrastructure and also discusses current policies and guidance.</p> <p>Section 1 outlines the Policy Context including NPF4 and the adopted LDP2. Reference is made to the Digital Fibre Network’ national development as set out in NPF4.</p> <p>Section 2 provides an overview of the context with digital infrastructure. High quality digital and full fibre broadband infrastructure and networks are an increasingly important facility for business and residents in both the urban and rural areas. Scotland’s Digital Strategy aims include the provision of high-quality connectivity across the whole of Scotland and ensuring new buildings are digital ready. The paper describes full fibre connectivity within East Renfrewshire and compares this with other local authorities regionally as shown in Figures 1 – 3. As of September 2023, 53%</p>	

or 22,630 premises had full fibre connectivity. This is slightly higher than the equivalent figure across Scotland at 52%. In addition, East Renfrewshire is well served for voice and data across all mobile networks with good 5G coverage for the main urban areas. Parts of the rural hinterland are though lacking 5G coverage.

Section 3 sets out the implications for LDP3, which have been informed by the analysis and outputs in the report.

The LDP3 Evidence Report SEA Scoping Report (April 2024) defines the scope/level of detail to be covered in the Environmental Report for the Proposed Plan. Section 4 provides an overview of the environmental characteristics of East Renfrewshire. Table 2 sets out the SEA objectives relating to each SEA theme which includes a section on digital considerations within the Population and Place theme.

Summary of Stakeholder Engagement

Section 4 'Engagement Statement' of the Evidence Report summarises the various engagement and consultation activities that have been undertaken to inform the Evidence Report. This includes collaborative working with Key Agencies and other stakeholders in the preparation of Topic Papers and the Play Sufficiency Assessment, and other place-based engagement and workshops.

A series of Topic Papers were prepared structured around the sustainable, liveable and productive places themes of National Planning Framework 4.

Wider external engagement with stakeholders commenced on 12th April and ended on 10th May 2024, inviting people interested in LDP3 to review the Topic Papers that cover their areas of interest and to share their comments. The aim of the engagement was to establish areas of agreement or disagreement and any additional evidence that should be taken into account.

The Topic Papers were published on the Council's Local Development Plan Hub on Commonplace, and through the Council's LDP3 website, Facebook and Twitter account and email notifications were sent to individuals and organisations listed on the LDP contact database.

The SEA Scoping Report was submitted to the SEA Gateway consultation authorities on 19th April for a 6-week consultation period. The Gateway Authorities were generally supportive of the Scoping Report subject to a few points for consideration for the Environmental Report to be prepared alongside the Proposed Plan. Comments are summarised in Section 4 Table 1 of the Evidence Report.

Summary of Implications for the Proposed Plan

The Proposed Plan should include policies to ensure new development is equipped with all necessary utility infrastructure, including facilities to enable the delivery of high-speed broadband and other digital services. To improve coverage across the area new developments should aim to provide digital infrastructure, in consultation with service providers, as an integral part of development proposals at the outset. This will help to reduce delays in connecting to existing networks and reduce lead-in times if capacity upgrades are required. A broadband and digital Statement and analysis provided at planning application stage, can help demonstrate the

developer's understanding of the digital infrastructure needs that require to be in place ahead of development.

The Council will continue to work with providers to secure investment and accelerate the roll out of ultrafast connectivity in the area in accordance with the spatial strategy and growth promoted through LDP3. The Council will also continue its work with partners to support and enhance residents and local businesses with digital skills as set out in the Economic Development Delivery Plan (CD 230).

Statements of Agreement / Dispute

Statements of Agreement

Scottish Water

Scottish Water recognises the importance of Digital Infrastructure and its' significant environmental, social and economic impact. We fully support this document and the plans to ensure future and current homes and businesses in East Renfrewshire are digitally connected. We will work with infrastructure providers to ensure any new digital infrastructure or upgrades to existing digital infrastructure do not impact on Scottish Water assets. Access and stand-off distances may be required, where applicable, and further details on our policy can be found in the attached document.

East Renfrewshire Council Response

The Council notes and welcomes the supporting comment.

Statements of Dispute

None received

Gate Check

The Council is of the view that there are no areas of dispute to be considered at Gate Check for this topic.

<p>East Renfrewshire LDP3 Issue Topic Paper 022: Economic Development</p>	<p>NPF4 - Productive Places Policy 25: Community Wealth Building Policy 26: Business and Industry</p>
<p>Information required by the Act regarding the issue addressed in this section</p>	<p><u>2019 Planning (Scotland) Act</u></p> <p>Section 15(5):</p> <ul style="list-style-type: none"> • set out the principal physical, cultural, economic, social, built heritage and environmental characteristics of the district; and • the principal purposes for which the land is used.
<p>Links to Evidence</p>	<ul style="list-style-type: none"> • Office for National Statistics Cost of living latest insights (CD 066) • Household Costs Index (HCI) (CD 067) • Scottish Enterprise Economic Commentary (Feb 2024) (CD 096) • East Renfrewshire's GVA (CD 016) • National Planning Framework 4 (NPF4) 2023 (CD 102) • Scotland's National Strategy for Economic Transformation (March 2022) (CD 089) • Glasgow City Region Economic Strategy and Action Plan (2022) (CD 181) • Ryden draft regional property market overview (in progress) (CD 180) • East Renfrewshire City Deal (CD 215) • East Renfrewshire Economic Baseline Report (CD 232) • East Renfrewshire Economic Development Delivery Plan 2023-2025 (CD 230) • East Renfrewshire community asset transfers (CD 216) • East Renfrewshire Economic Briefing 2024 (CD 233) • East Renfrewshire adopted Local Development Plan 2 (March 2022) (CD 206) • East Renfrewshire Place to Grow (CD 260) • East Renfrewshire Business and Industry Land Monitoring Report 2023 (SD 003)

<p>Summary of Evidence</p>	
<p>The purpose of this Topic Paper is to provide background information on the subject of economic development. This Topic Paper looks at the issues which influence the economic context and also discusses current policies and guidance regarding economic development. The Council places a key emphasis on driving economic vitality and the benefits that a prosperous economy will bring about for the residents of East Renfrewshire. It seeks to shape the area into a more prosperous place for residents and businesses alike and to be ‘safer, greener and cleaner’ by increasing economic growth and prosperity, to invest further in communities and to create jobs and opportunities for the citizens of East Renfrewshire.</p> <p>Section 1 provides an overview of the local economic context and the key challenges that require to be considered in the LDP. This section provides an overview of the areas core strengths, a summary of the existing commercial property and land stock and issues experienced by local companies when looking to expand. An overview of the cost-of-living crisis, the importance of community wealth building to the local economy and potential future economic opportunities via the renewables and green energy sector is also referenced.</p> <p>Section 2 provides a summary of Economic Indicators which have implications for future economic opportunities and growth in East Renfrewshire.</p> <p>Section 3 outlines the Policy Context provided by NPF4.</p> <p>Section 4 provides an overview of national, regional and local economic strategies as referred to in the evidence section above. A summary is also provided of the East Renfrewshire economic baseline and future challenges and opportunities, the Rydens regional property market overview and the implications for each local authority in the Glasgow and Clyde Valley region, City Deal projects and the local economic development delivery plan.</p> <p>Section 5 describes the current business and industry supply and take up rate based upon the 2023 audit. Further details are provided in the Business and Industry Land Audit.</p> <p>Section 6 sets out the implications for LDP3, which have been informed by the analysis and outputs in the report.</p> <p>The LDP3 Evidence Report SEA Scoping Report (April 2024) defines the scope/level of detail to be covered in the Environmental Report for the Proposed Plan. Section 4 provides an overview of the environmental characteristics of East Renfrewshire. Table 2 sets out the SEA objectives relating to each SEA theme which includes a section on economic considerations within the Population and Place theme.</p>	
<p>Summary of Stakeholder Engagement</p>	
<p>Section 4 ‘Engagement Statement’ of the Evidence Report summarises the various engagement and consultation activities that have been undertaken to inform the Evidence Report. This includes collaborative working with Key Agencies and other stakeholders in the preparation of Topic Papers and the Play Sufficiency Assessment, and other place-based engagement and workshops.</p>	

A series of Topic Papers were prepared structured around the sustainable, liveable and productive places themes of National Planning Framework 4.

Wider external engagement with stakeholders commenced on 12th April and ended on 10th May 2024, inviting people interested in LDP3 to review the Topic Papers that cover their areas of interest and to share their comments. The aim of the engagement was to establish areas of agreement or disagreement and any additional evidence that should be taken into account.

The Topic Papers were published on the Council's Local Development Plan Hub on Commonplace, and through the Council's LDP3 website, Facebook and Twitter account and email notifications were sent to individuals and organisations listed on the LDP contact database.

The SEA Scoping Report was submitted to the SEA Gateway consultation authorities on 19th April for a 6-week consultation period. The Gateway Authorities were generally supportive of the Scoping Report subject to a few points for consideration for the Environmental Report to be prepared alongside the Proposed Plan. Comments are summarised in Section 4 Table 1 of the Evidence Report.

Summary of Implications for the Proposed Plan

A key consideration for LDP3 is that the future requirements of all employment sectors are met. The Proposed Plan should aim to provide a marketable and deliverable supply of employment land based upon needs and demands. This can improve the Council's position as an attractive location for economic investment whilst, at the same time, supporting rural economies and increasing economic diversity and opportunity. It is essential that there is a sufficient supply of good quality employment land, to cater for modern business needs and to provide a range of sites which caters for both the needs and aspirations of existing and new business. This approach will help mitigate and reduce the out commuting of the workforce by providing more skilled opportunities and more affordable housing options for local people.

It is critical that the area has the infrastructure – commercial, transport, digital, education, and housing – in the right places to support its economic growth and ensure all residents have access to economic opportunities. It is also critical to have the right environment to attract inward investors that bring well paid and highly productive jobs. High quality spaces and implementation of the 'Local Living' concept also promote greater social inclusion, neighbourliness and contribute to improvements in people's mental wellbeing.

The long-term growth and sustainability of the local economy relies upon having a diverse supply of good quality sites, infrastructure and premises that can support and encourage economic growth. Wherever possible, future land allocations should be situated in sustainable locations, such as within existing urban areas or places that are accessible by public transport and other sustainable transport modes. Well serviced sites in competitive sustainable locations with good transport linkages are key in providing for the long-term growth of the local economy. However, the lack (and scale) of land options in Council ownership and the limited vacant/derelict/brownfield land supply provides a challenge in progressing a diverse supply of suitable sites and providing opportunities for existing businesses to expand or relocate.

In addition, the area experiences high local residential land prices which also compound the difficulties in attempting to develop industrial and business sites. Combined with this the majority of land is in private ownership and largely under option to housing developers, the delivery of

economic land through the private sector remains crucial. This necessitates a partnership approach with the private sector to realise an attractive and competitive portfolio of sites which prove attractive to businesses.

LDP3 provides the opportunity to consider and review the approach to sites allocated for employment land. There is known local demand for business to relocate and /or expand within the area. A balanced approach is needed to ensure that the highest quality, marketable industrial and business locations are safeguarded and promoted for business expansion and for new businesses, whilst avoiding the unnecessary stagnation of poor-quality sites. Serviced employment land is therefore a high priority.

The Council will continue to explore the effectiveness of all employment sites currently included within the 2023 Employment Land Audit. This includes looking at alternative approaches to unlock sites that have been designated in several plans, including the use of compulsory purchase powers to bring sites forward. This will be informed by a Call for Sites and Ideas exercise. This will lead to those sites which are seen to best meet predicted future demands for employment land to be recommended to be considered for inclusion in the new LDP, and sites which are seen to be unsuitable or surplus to anticipated requirements to be recommended for de-allocation or not included. In addition, the Council will explore options for sites allocated for other uses that may be more suitable for future employment uses.

The prospect for improving the economic prospects through longer term improvements to the M77 Road corridor should be investigated within the Plan period. This corridor is well placed for access to the central Scotland economy and regional job market and is attractive for business investment. However, potential future growth would need to be balanced with the approaches identified within the NPF4, i.e. a focus on local living with investment moving away from locations that can only be reached by car towards more accessible areas that are connected by low-carbon and active travel options. Strengthening strategic transport connections remains a high priority however this needs to be balanced with decarbonising transport and improving active travel. From a business perspective, it is also recognised that transport/distribution represents a large percentage of costs and are responsible for significant emissions.

The approaches required to tackle climate change can offer major economic opportunities, with the potential for significant job creation in the renewables sector. This will require linkages between the LDP and the Economic Development Delivery Plan in recognising the vital role that the planning system plays in delivering new renewable technologies and, ultimately, a new green economy. Investment in the energy sector can bring wider economic benefits. In addition, consideration should be given to local office hubs to enable people to work from near their homes where home-working is not possible, supported by digital connectivity. The Council will continue to work closely with Scottish Power Energy Networks (SPEN) to plan for meeting the electrical supply needs for existing and planned development. Discussions with SPEN have identified that the loadings in East Renfrewshire are quite healthy and at this point there isn't a significant need for reinforcement. However, once the spatial distribution of sites has been agreed through the Proposed Plan then further discussion will be required with SPEN to identify if grid reinforcements are required.

The importance of town centres should continue to be promoted through LDP3 as hubs of retail, leisure and economic activity. Longer-term improvements to the appeal of our towns and neighbourhood centres will also be addressed through the Economic Development Delivery Plan. Taking a place-based approach to regeneration through the Local Action Plans will assist the Council and partners understand localised issues, the interconnections and relationships across

our town centres and neighbourhoods and will allow the coordination of action and investment to improve the quality of life for our communities.

New housing is an important part of the area's socio-economic infrastructure, with an important inter-relationship with labour market dynamics. Residential developments make an important contribution to the local economy through the creation of short-term employment for construction workers; longer term skills development associated with the development industry; contract opportunities for the local small to medium-sized enterprises (SME) supply chain and also generates increased retail expenditure in the local community. New housing needs to support a growing and improving local labour pool, including a diversity of types and tenure.

The quality of education provision and the high performance of our schools is one of the main reasons many people relocate to East Renfrewshire. However, the area lacks any further education opportunities. Together with the highly skilled and educated workforce opportunities for a university, satellite campus, college, skills academy or lab space should be investigated further through LDP3 to utilise the skills available within the area.

While it's crucial for East Renfrewshire to appeal to a younger workforce, it must also ensure robust support systems are in place for individuals to continue to engage in the economic activity as they age. This includes providing resources like opportunities for upskilling and good transport. Finally, the supply of adequate and affordable housing is a key determinant of increasing an area's working-age population. Young professionals, burdened by high housing costs, may look elsewhere into moving to areas with better housing supply and job opportunities. This means that housing affordability could limit labour mobility, potentially hindering economic growth. Delivery of affordable homes remains a key issue for LDP3 as highlighted through the Housing Topic Paper. Low wages for local people combined with some of the highest house prices is exacerbating the affordability situation. This issue is highlighted in the Council's Vision for the Future 'A Place to Grow' and is an issue for LDP3.

Community wealth building has potential to generate local business needs which may need specific local policies to support local initiatives and re-purposing of existing assets. A Community Wealth Building Strategy should be prepared which should set out how to apply community wealth building and community benefits through the planning system. Parts of the Council area fall within the SIMD areas. These communities require access (skills, physical, and education) to decent employment opportunities and investment in local infrastructure. LDP3 and the Community wealth building strategy should also recognise the importance of the well-being economy.

The potential to expand leisure and tourism at a range of locations, such as Dams to Darnley Country Park, Rouken Glen Park and Whitelee Wind Farm, will also assist with growing the local economy through the Explore East Ren project. The sustainability of the rural economy is also important, and the Council will seek to support appropriate development in the green belt and rural areas.

Statements of Agreement / Dispute

Statements of Agreement

Skills Development Scotland

Agree broadly with the evidence.

Scottish Water

Acknowledges the high-level overview presented in the Economic Development topic paper.

East Renfrewshire Council Response

The Council acknowledges and welcomes the supporting comment received.

Statements of Dispute

Homes for Scotland, ICENI On behalf of East Renfrewshire Home Builder Consortium (Mac Mic Group; Miller Homes; Robertson Homes; Taylor Wimpey), Miller Homes

Home building (and the home building industry) is central to economic growth. This is insufficiently reflected in the Topic Paper. The aspirations of the Council to foster economic development is required to be given robust consideration in setting the indicative Local Housing Land Requirement (iLHLR) figure. Reference is made to the Diffley Report which HFS state requires to be fully considered during the Evidence Report and evidence gathering processes.

HFS state that the socio-economic benefits of home building cannot be understated. Our members contribute millions of pounds annually to infrastructure investment across the district and their role as a principal funder of future investments must be fully recognised, as should their role in the journey towards net zero through the delivery of increasingly energy efficient homes as well as local living neighbourhoods.

East Renfrewshire Council Response

The socio-economic benefits of housebuilding are acknowledged within section 6 of Topic Paper 022: Economic Development. Similar wording has been added to section 1 Topic Paper 013: Housing to reflect this matter. Analysis of the Diffley Report is provided under the Council's response to Topic Paper 013: Housing.

Gate Check

The Council is of the view that there are no areas of dispute to be considered at Gate Check for this topic. The disputes regarding the indicative HLR are addressed under Topic Paper 013: Housing.

<p>East Renfrewshire LDP3 Issue: Topic Paper 023: Town Centres and Retailing</p>	<p>NPF4 - Productive Places Policy 27: City, town, local and commercial centres Policy 28: Retail</p>
<p>Information required by the Act regarding the issue addressed in this section</p>	<p><u>2019 Planning (Scotland) Act</u></p> <p>Section 15(5):</p> <ul style="list-style-type: none"> • to set out the principal physical, cultural, economic, social, built heritage and environmental characteristics of the district; and • the principal purposes for which the land is used.
<p>Links to Evidence</p>	<ul style="list-style-type: none"> • Scottish Government Town Centre Action Plan (CD 117) • Scotland's Towns Partnership (STP) Understanding Scottish Places (USP) tool (CD 093) • Scotland's Improvement Districts (CD 088) • National Planning Framework 4 (NPF4) 2023 (CD 102) • East Renfrewshire adopted Local Development Plan 2 (March 2022) (CD 206) • East Renfrewshire Economic Development Delivery Plan (CD 230) • Glasgow City Region Industrial and Commercial Land and Property Study 2024- Retail Assessment (CD 183) (in progress) • East Renfrewshire network of centres map (CD 292) • East Renfrewshire Your Town Audit (YTA) (CD 279) • East Renfrewshire Local Action Plans (CD 250) • Improvement Service Benchmarking - Vacancy rates (CD 039)
<p>Summary of Evidence</p>	
<p>The purpose of this Topic Paper is to provide background information on the subject of Town Centres and retailing. This Topic Paper looks at the issues which influence the retail sector and also discusses current policies and guidance regarding retail development. It focuses upon the network of strategic centres across East Renfrewshire in terms of their strategic roles and functions and provides monitoring information on the performance of the town and neighbourhood centres.</p>	

Section 1 provides an overview of the changing retail context and the key challenges. Town and Neighbourhood Centres make an important contribution to Sustainable Economic Growth and provide a source of employment and services for local communities. The Topic Paper references the changing and evolving retail patterns including changes in people's behaviour such as increasingly shopping online, becoming more aware of and appreciative of the local economy, and embracing the need for sustainability and climate change. The paper discusses the role of Scotland's Towns Partnership (STP) which promotes the diversity of our towns and places. The Topic Paper acknowledges the difficulty in the delivery of new neighbourhood centres through master plans.

Section 2 outlines the Policy Context which includes a summary of NPF4, the Council's adopted LDP2 and Economic Delivery Plan and the regional land and property study.

Section 3 provides an overview of the Network of Centres and Town Centre Audits. East Renfrewshire is well served by a network of centres ranging from its four town centres of Newton Mearns, Barrhead, Clarkston and Giffnock to local neighbourhood centres that serve an important function for local residents. Table 1 shows the network of centres.

A summary of Town Centre and key neighbourhood centre audits is provided based upon the Your Town Audit framework. Building upon the outcomes of the Town Centre Audits 8 Local Action Plans are being developed which will assist in transforming towns and neighbourhoods across the Council area.

Section 4 provides an overview of NPF4 Policy 27 requirements. This includes Town Centre Living and Non Retail Clusters. The Paper concludes that while supportive of promoting residential opportunities in the town centres the likely contribution from such sources would be small due to a limited availability of vacant land and buildings within the Town Centre boundaries. Furthermore, there is no significant clustering or impact of betting shops across the network of centres, the majority of hot food takeaways are found within Barrhead and this clustering should continue to be monitored, with high interest money lending premises not seen as an issue.

Section 5 provides a summary of the Retail Outlet Survey. The paper sets out survey information on each of the town and neighbourhood centres, including breakdown by use and levels of vacancy.

Section 6 sets out the implications for LDP3, which have been informed by the analysis and outputs in the report.

Summary of Stakeholder Engagement

Section 4 'Engagement Statement' of the Evidence Report summarises the various engagement and consultation activities that have been undertaken to inform the Evidence Report. This includes collaborative working with Key Agencies and other stakeholders in the preparation of Topic Papers and the Play Sufficiency Assessment, and other place-based engagement and workshops.

A series of Topic Papers were prepared structured around the sustainable, liveable and productive places themes of National Planning Framework 4.

Wider external engagement with stakeholders commenced on 12th April and ended on 10th May 2024, inviting people interested in LDP3 to review the Topic Papers that cover their areas of interest and to share their comments. The aim of the engagement was to establish areas of agreement or disagreement and any additional evidence that should be taken into account.

The Topic Papers were published on the Council's Local Development Plan Hub on Commonplace, and through the Council's LDP3 website, Facebook and Twitter account and email notifications were sent to individuals and organisations listed on the LDP contact database.

The SEA Scoping Report was submitted to the SEA Gateway consultation authorities on 19th April for a 6-week consultation period. The Gateway Authorities were generally supportive of the Scoping Report subject to a few points for consideration for the Environmental Report to be prepared alongside the Proposed Plan. Comments are summarised in Section 4 Table 1 of the Evidence Report.

Summary of Implications for the Proposed Plan

Town centres need to be re-purposed. Traditional models of retailing are changing with online shopping etc. Town centres of the future need to be where people live, as well as shop and work. When people live in town centres, there can be a more successful evening economy as well as daytime footfall. This transition would allow retail and employment with homes above and alongside, and enough people to allow things to thrive and grow.

LDP3 will continue to establish a network of centres and promote the Town Centre First Principle to support the vitality and viability of our network of centres. This will provide a framework for ensuring the right investment goes to those places and communities that need it most. The current town and neighbourhood centre boundaries identified in LDP2 will be reviewed for the Proposed Plan to ensure they remain accurate and up-to-date. Increasing vacancy rates also needs to be addressed. Clustering of betting shops is not seen as a particular issue, however, there is a significant number of hot food takeaways in Barrhead which should continue to be monitored.

There is a need to invest in our places to ensure that they are destinations where people want to visit and spend time in. This means making the most of any built environment assets, ensuring new developments are designed to highest standard, that there is investment in quality public realm and that maintenance is factored into place management. High quality spaces and implementation of the 'Local Living' concept also promote greater social inclusion, neighbourliness and contribute to improvements in people's mental wellbeing. LDP3 should encourage proposals for cultural or creative spaces which support the local living agenda and contribute to vibrant healthy town centres.

There is a need to integrate transport and land use planning and recognise the importance of active and sustainable travel within, and to and from town centres. This will help create centres and places that communities find attractive and want to spend time in.

The requirement for new convenience or comparison provision or new Neighbourhood Centres will be considered through the final outcomes of the regional retail assessment and through the preparation of master plans and development briefs. Opportunities for ground floor retail with flats of all tenures above will be considered to maximise the efficient use of land and help address wider housing needs.

The land use and spatial implications of the emerging Local Area Action Plans will be factored into the Proposed Plan.

Statements of Agreement / Dispute

Statements of Agreement

Scottish Water

Request, where possible, the inclusion of sustainable surface water management principles and plans to inform and influence the design and planning process of town centres and associated retailing. Scottish Water continues to emphasise the need for closer partnership working to deliver blue-green infrastructure to transform towns and urban environments within the action area to tackle both climate and bio-diversity emergencies.

ICENI on behalf of the Baird Family

Agree broadly with the evidence. The response acknowledges that the Town Centre First Principle will aim to support the vitality and viability of the network of centres in East Renfrewshire. It goes on to state that consideration must be given to the requirement for boosting local scale retail in existing rural settlements and the role additional housing can play in supporting the viability of existing services and contribute to delivery of new services. Appropriate scales of local retail as part of new residential schemes in rural settlement locations can help create places where people can sustainably live. This should be reflected in LDP3 policy.

Avison Young on behalf of Aldi Stores

Aldi supports the general comments on retail trends and desires, to promote more local living and more sustainable shopping patterns.

East Renfrewshire Council Response

The Council acknowledges and welcomes the supporting comments received. The Council is supportive of the provision of new facilities with the delivery of new housing proposals in both the urban and rural areas. The Local Living analysis will assist with this process.

Statements of Dispute

Avison Young on behalf of Aldi Stores

NPF4 requires LDPs to consider where there may be a need for further retail provision, to address deficiencies in terms of the quality or quantity of the offer within certain areas. This also applies to new residential expansion areas to ensure shopping requirements can be met locally. The responses states that these matters have not been given consideration.

Response notes that a Strathclyde-wide retail capacity model focused on comparison goods is still being prepared but given its non-food focus and strategic considerations, believe that this will not adequately identify more localised deficiencies across East Renfrewshire.

An assessment of provision in Clarkston is provided which concludes that there is a significant quantitative and qualitative deficiency in convenience shopping provision within the Clarkston area.

The significant level of food shopping deficiency within Clarkston specifically should be planned for as part of the preparation of LDP3.

East Renfrewshire Council Response

The Council notes the response from Aldi Stores regrading convenience shopping provision within Clarkston. This matter will be investigated further at Proposed Plan stage and will reflect finalised outcomes of the regional retail assessment (CD183).

Gate Check

The Council is of the view that there are no areas of dispute to be considered at Gate Check for this topic.

<p>East Renfrewshire LDP3 Issue Topic Paper 024 - Creativity, Culture and Tourism</p>	<p>NPF4 – Productive Places Policy 30: Tourism Policy 31: Creativity and Culture</p>
<p>Information required by the Act regarding the issue addressed in this section</p>	<p><u>2019 Planning (Scotland) Act</u></p> <p>Section 15(5):</p> <ul style="list-style-type: none"> • the principal cultural, social and built heritage characteristics of the district; and • the desirability of maintaining an appropriate number and range of cultural venues and facilities (including in particular, but not limited to, live music venues) in the district.
<p>Links to Evidence</p>	<ul style="list-style-type: none"> • National Planning Framework 4 (NPF4) 2023 (CD 102) • East Renfrewshire Adopted Local Development Plan 2 (LDP2) (CD 206) • East Renfrewshire Culture and Leisure Trust (ERCL) 2024/25 Business Plan.(CD 266) • East Renfrewshire Public Library Strategy 2024/2029 (CD 195) • East Renfrewshire Draft Cultural Strategy 2024 –2029 (CD 229) • Scottish Householder Survey 2022 (CD 126) • Visit Scotland (CD 166) • East Renfrewshire City Deal (CD 215)
<p>Summary of Evidence</p>	
<p>The purpose of this topic paper is to provide an overview of current cultural provision across East Renfrewshire. It considers how changing demographics, societal trends and national policy will influence LDP3’s position on for cultural facilities and creative participation. The Topic Paper also provides an overview of tourism in East Renfrewshire and outlines future faith and burial requirements.</p> <p>Section 1 outlines the Policy Context as provided by NPF4.</p> <p>Section 2 provides an overview of current cultural provision across East Renfrewshire including an assessment of future growth and demand for cultural and creative activities. Cultural venues play an important role within communities as “anchor” destinations supporting the principle of local living neighbourhoods. East Renfrewshire’s cultural resource which includes libraries, leisure centres, halls, theatres, parks, is audited and participation and attendance figures at facilities is provided.</p>	

Section 3 provides an overview of tourism in East Renfrewshire. There is no current tourism strategy for East Renfrewshire but there are attractions which draw large numbers of visitors. This includes Rouken Glen Park, Dams to Darnley Country Park and Whitelee Windfarm.

Section 4 provides an overview of faith and burial requirements. East Renfrewshire is one of the most ethnically and culturally diverse areas in Scotland, with significant Jewish and Muslim communities. Over recent years there has been discussions with various faith groups about their need for a spiritual, education and cultural space, including burial space. An assessment of the capacity of current burial grounds and future needs is highlighted.

Section 5 sets out the implications for LDP3, which have been informed by the analysis and outputs in the report.

The LDP3 Evidence Report SEA Scoping Report (April 2024) defines the scope/level of detail to be covered in the Environmental Report for the Proposed Plan. Section 4 provides an overview of the environmental characteristics of East Renfrewshire. Table 2 sets out the SEA objectives relating to each SEA theme which includes a section on creativity, culture and tourism considerations within the Cultural Heritage theme.

Summary of Stakeholder Engagement

Section 4 'Engagement Statement' of the Evidence Report summarises the various engagement and consultation activities that have been undertaken to inform the Evidence Report. This includes collaborative working with Key Agencies and other stakeholders in the preparation of Topic Papers and the Play Sufficiency Assessment, and other place-based engagement and workshops.

A series of Topic Papers were prepared structured around the sustainable, liveable and productive places themes of National Planning Framework 4.

Wider external engagement with stakeholders commenced on 12th April and ended on 10th May 2024, inviting people interested in LDP3 to review the Topic Papers that cover their areas of interest and to share their comments. The aim of the engagement was to establish areas of agreement or disagreement and any additional evidence that should be taken into account.

The Topic Papers were published on the Council's Local Development Plan Hub on Commonplace, and through the Council's LDP3 website, Facebook and Twitter account and email notifications were sent to individuals and organisations listed on the LDP contact database.

The SEA Scoping Report was submitted to the SEA Gateway consultation authorities on 19th April for a 6-week consultation period. The Gateway Authorities were generally supportive of the Scoping Report subject to a few points for consideration for the Environmental Report to be prepared alongside the Proposed Plan. Comments are summarised in Section 4 Table 1 of the Evidence Report.

Summary of Implications for the Proposed Plan

There are increased pressures on cultural venues offering cultural activity due to increased use since the end of Covid restrictions and changes in patterns of use resulting from a growing population and changes to the demographic profile with a greater proportion of young people

and older people who use these facilities more than other age demographics. LDP3 should consider the desirability of maintaining the good geographic spread of halls and libraries.

LDP3 should take into consideration proposals for a new combined library/pool in Neilston. The proposal is currently at feasibility stage. If the building proceeds to construction, this is likely to be within the life cycle of LDP3.

LDP3 should be cognisant of the approved plans for new Eastwood leisure complex in Eastwood Park. The project is identified in the Council's capital programme for 2023/2024, with more detailed designs for the building to be developed over the course of 2024. It is uncertain if construction will have commenced or be complete before adoption of LDP3. In addition the spatial outcomes of the wider master plan and potential network opportunities should be considered through the Proposed Plan.

LDP3 should encourage proposals for cultural or creative spaces which support the local living agenda and contribute to vibrant healthy town centres.

It will be prudent to keep an awareness of the worsening condition of some buildings within the Council's building portfolio which provide cultural services.

The requirement to consider NPF 4 Policy 31 as part of the full suite of NPF4 policies and ensure that policies supporting creativity and culture are complimentary with other policy agendas.

LDP3 should be supported by appropriately scaled development contributions to ensure financial resources are in place to meet the cultural needs of an expanding population.

The climate emergency is driving changes in energy efficiency how buildings are heated and managed. The upgrading or construction of new venues with high energy efficiency ratings and using energy supplied from renewable sources will support the Council's Get to Zero targets.

There are pressures on peak time car-parking at Rouken Glen and Whitelee Windfarm.

Plans to construct a visitor centre and new facilities in Dam to Darnley Country Park may fall within the life cycle of LDP3 and will require accommodation.

An understanding of the aspirations of faith communities and how they will change in the future and the ongoing need for spiritual, education and cultural space for religious groups should be considered through LDP3. This could be achieved through identification of land through master plans and Council asset reviews of existing buildings or land.

Planning for the future availability of Cemetery space through LDP3 and future plans is essential at this time to allow the Council to meet legislative requirements.

Statements of Agreement / Dispute

Statements of Agreement

Scottish Water

Welcomes opportunities for new creative and cultural spaces to be developed and will work with partners and licenced providers to facilitate such developments.

Amir Hussain (On behalf of the local ERC Muslim community)

There is a pressing need for additional burial space for our community. As the population continues to grow, existing cemeteries are nearing full capacity, and it has become increasingly challenging for families to find suitable resting places for their loved ones. We are grateful to the ER council for funding the previous extension at Lynn Cemetery, however this will soon be at full capacity.

The current lack of available burial space has led to numerous concerns within the local community, including difficulties in securing plots for immediate family members, limited options for traditional burials, and heightened costs associated with alternative arrangements.

Given these circumstances, we kindly request that the ERC Local Planning Department consider undertaking timely measures to address this issue. Whether through the allocation of additional land for cemetery expansion or the exploration of alternative solutions, it is crucial that we take proactive steps to ensure that our community members have access to dignified and accessible burial options.

East Renfrewshire Council Response

The Council notes and welcomes the supporting comment.

The Topic Paper clearly acknowledges issues concerning burial space in section 4 and within Topic Paper 014: Infrastructure First. This could be achieved through identification of land through master plans and Council asset reviews of existing buildings or land.

Gate Check

The Council is of the view that there are no areas of dispute to be considered at Gate Check for this topic.

<p>East Renfrewshire LDP3 Issue Topic Paper 025: Minerals and Coal mining</p>	<p>NPF4 – Productive Places Policy 33: Minerals and Coal mining</p>
<p>Information required by the Act regarding the issue addressed in this section</p>	<p><u>2019 Planning (Scotland) Act</u></p> <p>Section 15(5):</p> <ul style="list-style-type: none"> • The principal economic and environmental characteristics of the district.
<p>Links to Evidence</p>	<ul style="list-style-type: none"> • <u>National Planning Framework 4 (NPF4) 2023 (CD 102)</u> • <u>East Renfrewshire adopted Local Development Plan 2 (LDP2) (2022) (CD 206)</u> • <u>Aggregate and minerals survey- Scotland 2019 (CD 098)</u> • The Coal Authority <u>Coal mining reporting area (CD 155)</u> • Site Assessment Framework (SD 001)
<p>Summary of Evidence</p>	
<p>The Topic Paper provides data on the location of quarries and aggregate supply. Minerals and aggregates are a strategic resource which are monitored at a national level by both Scottish and UK governments. East Renfrewshire is part of the West Central Scotland Region for the national assessment of reserves, sales and end uses of mineral and aggregates. The Topic Paper also provides an overview of coal mining and indicates where there are ‘development high risk areas’ in East Renfrewshire.</p> <p>Section 1 outlines the policy context as provided by NPF4 and the Council’s adopted LDP2.</p> <p>Section 2 provides data on the location of quarries and aggregate supply. In East Renfrewshire there is one active quarry at Floak which produces crushed rock. The quarry was given planning consent in 2003 for five years extraction. Since the initial permission the five-year period has been extended at five yearly intervals. In 2018 the quarry was given permission to extend the boundary of operations. The extension site provides 10 million tonnes of stone which at current rates of extraction will keep the quarry in operation until the 2050s. The planning consent runs until 2058.</p> <p>East Renfrewshire is within the West Central Scotland Aggregate and Mineral region. The Scottish Government 2019 Aggregate Survey of Scotland establishes the levels of aggregate supply in the West Central Scotland area. NPF4 states that LDP’s should support a landbank of construction aggregates of at least 10 years. At the time of writing, 2024, aggregate supply is being met.</p> <p>Section 3 provides an overview of coal mining in East Renfrewshire. There is a history of coal mining in northern section of the authority across Barrhead, Giffnock and Newton Mearns and the</p>	

western section of the authority beneath Uplawmoor. Coal mining has left a legacy of potential ground instability which in some areas is designated as a high-risk development area. The Coal Authority High Risk Development Area covers approximately 2.44% of the Council area.

The East Renfrewshire area contains coal resources which may be capable of extraction by surface mining methods, these resources cover approximately 2.49% of the Plan area. Prior extraction of coal close to surface can have the benefit of removing any potential land instability problems.

Section 4 sets out the implications for LDP3, which have been informed by the analysis and outputs in the report.

The LDP3 Evidence Report SEA Scoping Report (April 2024) defines the scope/level of detail to be covered in the Environmental Report for the Proposed Plan. Section 4 provides an overview of the environmental characteristics of East Renfrewshire. Table 2 sets out the SEA objectives relating to each SEA theme. Minerals and coal mining is covered under the Soil and Geology theme.

Summary of Stakeholder Engagement

Section 4 'Engagement Statement' of the Evidence Report summarises the various engagement and consultation activities that have been undertaken to inform the Evidence Report. This includes collaborative working with Key Agencies and other stakeholders in the preparation of Topic Papers and the Play Sufficiency Assessment, and other place-based engagement and workshops.

A series of Topic Papers were prepared structured around the sustainable, liveable and productive places themes of National Planning Framework 4.

Wider external engagement with stakeholders commenced on 12th April and ended on 10th May 2024, inviting people interested in LDP3 to review the Topic Papers that cover their areas of interest and to share their comments. The aim of the engagement was to establish areas of agreement or disagreement and any additional evidence that should be taken into account.

The Topic Papers were published on the Council's Local Development Plan Hub on Commonplace, and through the Council's LDP3 website, Facebook and Twitter account and email notifications were sent to individuals and organisations listed on the LDP contact database.

The SEA Scoping Report was submitted to the SEA Gateway consultation authorities on 19th April for a 6-week consultation period. The Gateway Authorities were generally supportive of the Scoping Report subject to a few points for consideration for the Environmental Report to be prepared alongside the Proposed Plan. Comments are summarised in Section 4 Table 1 of the Evidence Report.

Summary of Implications for the Proposed Plan

NPF4 states that LDPs should safeguard important workable mineral resources which are of economic and conservation value and take steps to ensure these are not sterilised by other types of development.

There are sufficient mineral and aggregate resources available to meet demand. The effective Scottish Government moratorium on unconventional oil and gas remains in place.

The working quarry at Floak and the recently exhausted quarry at Bannerman are both within the area designated for wind energy development. Any future applications for aggregate extraction are likely to be in the moorland zone which is easily accessed by the A77 and B769. There is therefore potential for competing land-use between windfarm development and quarrying. NPF4 gives considerable weight to the contribution of renewable energy proposals on reduction of greenhouse gas emissions.

Given that aggregate quarrying is an ongoing requirement that constantly requires new sites LDP3 should prepare for the likelihood of further applications for quarrying proposals. LDP3 should therefore consider where the acceptable balance lies between windfarm development and safeguarding the mineral resource.

LDP3 should consider those areas identified as being at development high risk by the Coal Authority as a component of the Site Assessment Framework (SD 001) and in consultation with the Coal Authority.

Statements of Agreement / Dispute

Statements of Agreement

Coal Authority

Agree broadly with the evidence.

Leith Planning Group on behalf of EPC-UK

No objection to the Council's objectives and aspirations in relation to the promotion of growth and development within the plan area. EPC-UK have a hazardous materials storage site (explosive materials) at Bannerbank. Request that LDP3 pays due regard to the EPC-UK site by the following measures:

- Seek to protect such sites from unsuitable development encroachment within the site safety zones. Reference should be made within the plan to the need to protect hazardous substance installations and to work with operators and consult with them on new development proposals;
- Whilst reference is made within the plan to a number of environmental considerations there is limited consideration given to hazard sites, and associated wider community safety. These issues are clearly of significance, and we ask that they be given greater regard as the draft plan progresses; and

- Sites need to be retained and protected where required. Greater regard be paid within the proposed employment policies in the emerging draft plan to the protection and promotion of such sites, and clear support set out for their longer-term growth and development, to ensure that future business needs can be secured.

It would be beneficial for the Council to work collaboratively through the development of the emerging plan – Leith can assist in offering specialist advice on the operation and protection of hazard sites and local communities.

Scottish Water

Remain fully committed to working with East Renfrewshire Council on any themes that align.

East Renfrewshire Council Response

The Council acknowledges and welcomes the supporting comment received from Scottish Water and the Coal Authority. The Council notes the comments from the Leith Planning group regarding safety zones at the Bannerbank storage facility, this will be fully considered at the Proposed Plan stage.

Statements of Dispute

None received.

Gate Check

The Council is of the view that there are no areas of dispute to be considered at Gate Check for this topic.

<p>East Renfrewshire LDP3 Issue: Topic Paper 026: Socio Economic Profile</p>	<p>NPF4 General</p>
<p>Information required by the Act regarding the issue addressed in this section</p>	<p><u>2019 Planning (Scotland) Act</u></p> <p>Section 15(5): The principal physical, economic, and social characteristics of the district.</p> <p>The size, composition, health and distribution of the population of the district.</p>
<p>Links to Evidence</p>	<ul style="list-style-type: none"> • East Renfrewshire Economic Briefing February 2024 (CD 233). • Scotlands Census rounded population estimates data (2022) (CD 080) • National Records of Scotland (NRS) - East Renfrewshire Council profile (2022) (CD 043) • National Records of Scotland (NRS) - Migration to and from administrative areas (2021) (CD 046) • National Records of Scotland (NRS) - population projections (2018) (CD 047) • Improvement Service - SUB-COUNCIL AREA POPULATION PROJECTIONS (2018) (CD 038) • National Records of Scotland - Mid-2020 Population Estimates for Settlements and Localities in Scotland (CD 041) • Scotlands Census 2022 (CD 081) • National Records of Scotland household projections 2018 (CD 043) • Scottish House Condition Survey: Local Authority Analysis 2017-2019 (CD 125) • East Renfrewshire Economic Baseline Report (CD 232) • Registers of Scotland Property Market Report (CD 073) • UK House Price Index (CD 162) • NHS Greater Glasgow and Clyde 2022/23 Adult Health and Wellbeing Survey (CD 188) • British Heart Foundation provide local heart and circulatory disease statistics (CD 004) • Public Health Scotland - East Renfrewshire HSCP Profile 2020-21 (CD 281)

	<ul style="list-style-type: none"> • East Renfrewshire GPs - Condition Prevalence (CD 241) • Public Health Scotland - Primary 1 Body Mass Index (BMI) statistics Scotland (2022-2023) (CD 071) • Scottish Index of Multiple Deprivation 2020 (CD 127) • National Records of Scotland – Mid-2020 Small Area Population Estimates (CD 042) • East Renfrewshire Local Child Poverty Action Report 2022 -2023 (CD 234) • end child poverty (CD 018) • Scottish household condition survey (CD 144) • East Renfrewshire Local Transport Strategy LTS Case for Change Report (CD 256) • 2011 Census (CD 078) • Scottish Transport Statistics 2021 (CD 132) • East Renfrewshire’s GVA (CD 016) • Nomis Annual population survey 2022 (CD 060) • Nomis Labour Market Profile- East Renfrewshire 2023 (CD 061) • Office for National Statistics - Employment, unemployment and economic inactivity in East Renfrewshire- November 2023 (CD 063) • Office for National Statistics – Households by combined economic activity (CD 064) • Scotlands Census Business Demography – 2021 (CD 079)
--	--

Summary of Evidence

This Topic Paper provides an overview of the physical, economic and social context of East Renfrewshire. Like the rest of Scotland, East Renfrewshire faces great changes in its population in the coming years. We expect our population to increase, to have more elderly and younger residents, to see a decline in death rates and to have an increase in the number of households, as more people live alone. East Renfrewshire is already one of the most ethnically and culturally diverse communities in the country and we expect this trend to continue.

Summary of Stakeholder Engagement

Section 4 ‘Engagement Statement’ of the Evidence Report summarises the various engagement and consultation activities that have been undertaken to inform the Evidence Report. This includes collaborative working with Key Agencies and other stakeholders in the preparation of

Topic Papers and the Play Sufficiency Assessment, and other place-based engagement and workshops.

A series of Topic Papers were prepared structured around the sustainable, liveable and productive places themes of National Planning Framework 4.

Wider external engagement with stakeholders commenced on 12th April and ended on 10th May 2024, inviting people interested in LDP3 to review the Topic Papers that cover their areas of interest and to share their comments. The aim of the engagement was to establish areas of agreement or disagreement and any additional evidence that should be taken into account.

The Topic Papers were published on the Council's Local Development Plan Hub on Commonplace, and through the Council's LDP3 website, Facebook and Twitter account and email notifications were sent to individuals and organisations listed on the LDP contact database.

The SEA Scoping Report was submitted to the SEA Gateway consultation authorities on 19th April for a 6-week consultation period. The Gateway Authorities were generally supportive of the Scoping Report subject to a few points for consideration for the Environmental Report to be prepared alongside the Proposed Plan. Comments are summarised in Section 4 Table 1 of the Evidence Report.

Summary of Implications for the Proposed Plan

This should cover what the evidence means for the plan, e.g. the spatial strategy, the Delivery Programme or plan preparation.

Statements of Agreement / Dispute

Statements of Agreement

Scottish Water

Scottish Water acknowledges the high-level overview presented in the Socio-Economic topic paper and has no further comment to make at this time.

Skills Development Scotland

Broadly agree with the Evidence.

East Renfrewshire Council Response

The Council acknowledges and welcomes the supporting comments received.

Statements of Dispute

Homes for Scotland, ICENI on behalf of The Mac Mic Group, Miller Homes, ICENI on behalf of East Renfrewshire Home Builder Consortium (Mac Mic Group; Miller Homes; Robertson Homes, Taylor Wimpey), ICENI on behalf of the Baird Family

The paper states that, between 2018 and 2028, the population in East Renfrewshire is projected to increase by 6.4%, as opposed to a projected increase of 1.8% for Scotland as a whole. The papers also states that between 2018 and 2028, the number of households is projected to increase from 39,108 to 42,139 (an increase of 7.8%), which compares to a projected increase of 4.9% for Scotland as a whole. Households are projected to increase by 19% (2018 to 2043).

This significant expected population and housing increases should be given robust consideration in setting the indicative Local Housing Land Requirement (iLHLR) figure. Figures indicate a severe and urgent need for more homes and a holistic and strategic plan led approach to allocating more land (and looking to Green Belt release.

The HLR must take into consideration the findings of the Homes for Scotland (Rettie and Diffley) Existing Housing Need and Demand.

The ERC land supply will need to be re-assessed to establish suitability and deliverability. There are legacy sites which have low prospects of delivery and ERC cannot assume that all of the supply can be carried forward to LDP3. The realistic land supply is therefore likely to be less than the HLA demonstrates.

A National Housing Emergency was declared by the Scottish Government on 15th May 2024, this gives just cause for LDP3 to set a higher iLHLR.

The socio-economic benefits of home building cannot be understated.

New populations can also contribute to the vitality and sustainability of current community facilities, often through additional investment and spending in local services. Scotland's Census 2022 concluded that Scotland's population is ageing: There are more people in the older age groups than ever recorded in Scotland's Census. There are now over one million people aged 65 and over (1,091,000). This is over a quarter of a million higher than the number of people under 15 (832,300) This confirms that Scotland's housing needs are changing and LPAs must promote the delivery of housing that meets a range of housing needs.

East Renfrewshire Council Response

Responses state that population and housing increases should be considered in setting the indicative HLR. The HNDA factors in housing projections based upon the 2018 NRS projections. The Council has also compared the 10-year 2018 NRS projections with the indicative HLR as set out in Table 3 of the Topic Paper 13: Housing.

Analysis of the Diffley Report is provided under the Council's response to Topic Paper 013: Housing.

The Council acknowledge that the Scottish Government has declared a housing emergency, but this alone does not support the case for significantly increasing the East Renfrewshire HLR. To acknowledge this issue a reference to the national housing emergency has been added to Topic Paper 013: Housing.

Responses state that the current housing land supply will need to be reassessed. Section 7 of Topic Paper 013: Housing. 'Implications for LDP3' clearly states that the Council will continue to explore the effectiveness and deliverability of all housing sites currently included within the 2023 Housing Land Audit. The Site assessment framework also reaffirms the LDP guidance requirement

that no sites will automatically roll forward from the current adopted LDP2, a position supported by HFS and their members' comments to this document.

The socio-economic benefits of housebuilding are acknowledged within section 6 of Topic Paper 022: Economic Development. Similar wording has been added to section 1 Topic Paper 013: Housing to reflect this matter.

Gate Check

The Council is of the view that there are no areas of dispute to be considered at Gate Check for this topic. Disputes regarding the indicative HLR are addressed under the response to Topic Paper 013: Housing.