

**EAST RENFREWSHIRE COUNCIL****24 June 2020****Report by Director of Environment****PROPOSED LOCAL DEVELOPMENT PLAN 2 – RESPONSE TO REPRESENTATIONS****PURPOSE OF REPORT**

1. The purpose of this report is to seek the Council's approval for the responses to representations on the Proposed Local Development Plan 2 (LDP2) and to submit these to the Scottish Government for formal Examination. These are attached as Appendix 1 and 2.

**RECOMMENDATIONS**

2. It is recommended that the Council:
- (a) Approves the proposed responses and recommendations to representations made as contained within Appendix 1 and 2 to this report;
  - (b) Delegates to the Director of Environment to approve any minor inconsequential changes arising from the responses to be incorporated into the finalised 'Schedule 4 Forms'; and
  - (c) Approves submission of the Proposed Local Development Plan 2, supporting documents and the finalised 'Schedule 4 Forms' to Scottish Ministers in due course for Examination.

**BACKGROUND**

3. The Local Development Plan is the Council's key strategic land use planning document which strongly links with the Corporate and Community Plans. The current Local Development Plan (LDP1) was adopted in June 2015 and sets out a long term vision and Development Strategy for East Renfrewshire up to 2025.

4. At its meeting on 26<sup>th</sup> June 2019, the Council approved the Proposed Local Development Plan 2 (LDP2) and supporting documents for publication and an 8 week consultation period. That report also recommended a change to the overall spatial strategy for the Proposed LDP2 in view of existing educational constraints. Consultation on the Proposed LDP2 closed on the 13<sup>th</sup> December 2019.

5. The Proposed LDP2 promotes a refreshed strategy of regeneration and consolidation of the urban areas and enhancing existing places alongside a focus on protecting green spaces in line with Option 2B of the MIR 'Consolidation and Regeneration'.

**REPORT**

6. The Council is required to consider every representation received to the Proposed LDP2 and provide a response to each. If there are any unresolved objections, then the Proposed Plan and the outstanding objections are required to be submitted to Scottish

Ministers for Examination. The examination is conducted by Reporters from the Scottish Government's Planning and Environmental Appeals Division (DPEA) on behalf of the Ministers.

7. All representations have been summarised and grouped into a smaller number of issues or what is commonly known as 'Schedule 4 Forms' as defined under the terms of Schedule 4 of the Town and Country Planning (Development Planning) (Scotland) Regulations 2008. These forms summarise the representations received in respect of particular issues, specify the changes sought by those making the representation, and set out the Council's response to the representation. The DPEA Reporters' final recommendations to each issue will be added to these forms during the Examination process.

8. A total of 36 Schedule 4 forms have been prepared and these are set out in Appendix 2 to this report. Colleagues in other departments including Education, Housing and HSCP have assisted with this process. Representations have been largely grouped to reflect the chapter order of the Proposed LDP2. Comments on housing sites have been grouped geographically.

9. The Schedule 4 and Examination process offers the opportunity for the Council to accept some of the modifications proposed by representations received to the Proposed LDP2. The proposed modifications to which it is recommended the Council accept are set out within Appendix 1.

### **Overview of representations received to Proposed Plan**

10. A total of 568 individual responses were received to the Proposed Plan and supporting documents. Comments were received on a wide range of issues. The majority of the representations received are in relation to 5 proposals, namely:

- Policy M4: Braidbar Quarry, Giffnock;
- Proposal D8.13: Netherlee to Giffnock – Access Project;
- Proposal SG1.17: Neilston Juniors, Neilston – Housing Proposal;
- Proposal SG1.20: North Kirkton Road, Neilston - Housing Proposal; and
- Proposal SG1.23: Broompark Drive, Newton Mearns – Housing Proposal.

The majority of representations in each case were seeking the deletion of these sites/proposals from the Proposed LDP2.

11. Housebuilders and the development industry raised a number of objections to the Development Strategy, raising concerns that in their view the Proposed LDP2 was overly restrictive towards future housing allocations and education provision and mitigation. They were of the opinion that new residential allocations were required for LDP2.

12. In addition, 31 alternative development proposals were promoted by developers/landowners as being suitable for inclusion in the Proposed LDP2.

### **Proposed Plan Responses and Recommendations**

13. A number of objections were raised in relation to the Proposed LDP2 Development Strategy. The strategy of the Proposed LDP2 reflects the need to achieve a sustainable pattern of development. This approach is in line with the 'compact city' approach and vision set out in the approved Strategic Development Plan 'Clydeplan' (2017). Full consideration has been given to all representations received in relation to the Proposed LDP2 strategy, however no significant modifications are proposed to either the Development Strategy or the

allocated housing sites; rather the proposed Council responses have been prepared to strongly defend the Council's position. It is worth noting that neither the Scottish Government nor any of the Key Agencies or infrastructure providers have raised any significant concerns with the Development Strategy or any significant infrastructure issues with sites allocated in the Proposed LDP2.

14. Supporting representations were received in relation to the Proposed Plan's economic, social and environmental focus; the Spatial Objectives; emphasis on a zero carbon place; commitment to active travel and sustainable transport; and emphasis on health and well-being.

15. A number of objections were received from housebuilders and the development industry on the Proposed Plan's approach to education provision and mitigation. The proposed Council responses are set out under Issue 2 (Development Strategy) and Issue 13 (Community and Education Facilities and Infrastructure). Under both issues, the proposed responses conclude that further housing releases would have major impacts upon the existing education infrastructure. The proposed responses also acknowledge the need to continually monitor the demand for education places and address future education infrastructure requirements.

16. It is important that the Council provides an effective land supply which meets the requirements of Scottish Planning Policy and Clydeplan. Failure to do so could result in the Reporter selecting a site or sites to meet housing requirements. The Council's approach to housing supply is addressed under Issue 2 (Development Strategy) and Issue 14 (Housing Supply, Delivery and Phasing). Under both issues, the proposed response demonstrates that the Proposed LDP2 is providing an effective and generous land supply and no additional land releases are therefore required.

17. There remains considerable pressure for housing development in East Renfrewshire. As stated in Para 12 above, 31 alternative proposals were suggested by developers, land owners and planning consultants as being suitable for inclusion in the Proposed LDP2. The majority of these proposals were for housing developments of varying scales in the Green Belt. None of the 31 alternative proposals are being recommended for inclusion in the Proposed LDP2. Further information on the proposed Council responses to each of these alternative housing proposals is set out under Issues 20 to 27 of Appendix 2.

18. A significant number of comments were received regarding Policy M4: Braidbar Quarry, requesting that the master plan area be deleted and the site retained as greenspace under Policy D5. It was also requested that Huntly playing fields should be excluded from the M4 master plan area. The Reporter who undertook the examination into LDP1 agreed with the Council that the master plan approach provided adequate protection for the existing greenspace. The Proposed LDP2 has strengthened the wording of the policy further and the Proposed LDP2 clearly states that development cannot proceed without a comprehensive remediation strategy covering the entire site. Remediation of the quarry remains a Council priority. Policy M4 provides a balanced way forward for remediation of the ground affected by the quarry workings which integrates the protection and enhancement of the environment and community facilities within the master plan boundary. The proposed Council response to these representations maintain the Council's position from LDP1 and it is recommended that the master plan policy approach is retained. Further information on the proposed Councils response is provided under Issue 6 (Braidbar Quarry).

19. Significant objection was also received to 2 housing proposals in Neilston, seeking the removal of both sites from the Proposed LDP2 namely Proposal SG1.17: Neilston Juniors; and Proposal SG1.20: North Kirkton Road, Neilston. The proposed Council response agrees that proposal SG1.17 should be removed and the community/sporting

provision at the site be retained. This approach also acknowledges that there is now a long-term lease in place between the Council and the football club. The proposed Council response does not however agree to the deletion of Proposal SG1.20. The site is a sustainable location with active developer interest. Further information on the proposed Council response to both proposals is set out under Issue 18 (Housing Supply Neilston).

20. Objections were received to the housing proposal at Broompark Drive, Newton Mearns due to impacts of flooding on the surrounding area and the loss of greenspace. The proposed Council response to these objections recognises the sensitivity of the site and that future proposals will require to be supported by a Flood Risk Assessment (which will also help identify the potential developable area within the overall site). The proposed Council response does not agree that this proposal be deleted. Further information on the proposed response is set out under Issue 19 (Housing Supply Newton Mearns).

21. Objections were received seeking the removal of Proposal D8.13: Netherlee to Giffnock, which aims to provide access across the railway line. 3 comments of support were also received to the proposal. The proposed Council response clearly states that currently there is neither a precise location nor an exact specification for this project and that a feasibility study would be required. It is considered premature to remove the principle of this project at this early concept stage, until a robust feasibility study can explore the logistics of the project, therefore the proposed response recommends that this Proposal is retained. Further information is set out under Issue 12 (Sustainable Transport Networks and Access).

22. The above paragraphs are a summary of the main issues discussed in the Schedule 4 forms in the appendices, however these should be read in full to see all the issues raised by objectors and the proposed full responses by the Council to each matter.

### **Next Stages**

23. Following approval of the Schedule 4 forms, they will be submitted along with supporting documentation to Scottish Ministers for Examination.

24. A lead Reporter will be appointed, along with a number of other Reporters based on the scale of the Examination. The Reporter(s) will receive a full copy of each individual representation received and will then determine whether further information is required in respect of any of the representations or if a Hearing is necessary. It is estimated that the Examination will take between 6 to 9 months.

25. An Examination Report will then be received including the Reporters' recommendations.

26. In addition to considering the issues raised, the Reporters will also examine the Proposed LDP2 to establish that appropriate publicity and consultation has been undertaken in accordance with the "Participation Statement" as set out in the Development Plan Scheme (2019). A 'Report of Conformity with the Participation Statement' document has been prepared which summarises the participation and consultation methods used to promote the Proposed LDP2.

27. At this stage it is anticipated that the formal Examination will commence in late Summer 2020.

### **FINANCE AND EFFICIENCY**

28. The costs associated with the LDP2 Examination will be met from within existing budgets.

29. Close liaison has been maintained with the Scottish Government and DPEA to ensure that the Examination process can be undertaken efficiently. The impact of the Coronavirus pandemic has resulted in a minor delay to the submission of the Schedule 4 forms for Examination, however, procedures have been put in place by the DPEA to allow LDP Examinations to continue.

## **CONSULTATION**

30. The preparation of the Proposed LDP2 has been the subject of considerable consultation and public engagement. The consultation undertaken on the Proposed LDP2 has been successful in raising public awareness of the Plan and in involving the community in shaping the future of their area.

31. The 'Report of Conformity with the Participation Statement' document summarises the participation and consultation methods used to promote the Proposed LDP2.

32. This report will be examined by the Reporter to ensure the Council has met the statutory minimum participation requirements and is the first stage of the Examination process.

## **PARTNERSHIP WORKING**

33. The Proposed LDP2 preparation has and will continue to be the subject of ongoing consultation with a wide range of both internal and external stakeholders.

## **IMPLICATIONS OF THE PROPOSALS**

34. There are no new staffing, property, policy, IT, equalities or other implications at this point in time.

## **CONCLUSIONS**

35. This report outlines the Council's response to all representations received to the consultation on the Proposed LDP2. Responses have been prepared that strongly defend the Council's position.

## **RECOMMENDATIONS**

36. It is recommended that the Council:

- (a) Approves the proposed responses and recommendations to representations made as contained within Appendix 1 and 2 to this report;
- (b) Delegates to the Director of Environment to approve any minor inconsequential changes arising from the responses to be incorporated into the finalised 'Schedule 4 Forms'; and
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Director of Environment

**June 2020**

**Appendix 1: Proposed Modifications**

Page	Para/Policy/Schedule	Modification
	<b><u>Plan period</u></b>	Revision to plan period to cover the period 2021 to 2031. It is recommended that references to 2029 are revised to '2031'.
11	<p><b><u>Habitats Directive</u></b> Header should be amended to read (revised text in italics)</p> <p><u>1st Para should be amended to read (revised text in italics)</u></p> <p><u>2<sup>nd</sup> Para should be amended to read (revised text in italics)</u></p>	<p>'Habitats <del>Directive</del> Regulations'</p> <p><i>A Habitats Regulations Appraisal (HRA) determines whether a plan or project should be subject to appraisal; outlines the 'screening' process for determining whether an appropriate assessment is required, as well as, any appropriate assessment. The screening Stage of the Habitats Regulations Appraisal screens the plan for likely significant effects on European sites. The Council has determined, that in the area covered by the Local Development Plan there are no Special Areas of Conservation or Special Protection Areas and there are no other <del>Natura</del> 'sites European' designated sites located outwith the East Renfrewshire area which are likely to be affected by the strategies, policies or proposals in the Plan and as a result a HRA is not required.</i></p> <p>Any future proposals or changes to the Plan which have the potential to have an adverse effect on the integrity of any <del>Natura</del> 'site European' designated sites will be subject to a Habitats Regulations Appraisal (HRA) in accordance with the Habitats Directive.</p>
14	<p><b><u>Policy Context</u></b> Delete the final para and replace with the following text to be inserted below the heading 'National Policy'</p>	<p><b><i>National Policy</i></b> <i>The Planning (Scotland) Act 2019 has introduced a significant number of changes to legislation, spatial planning and development management processes. Scottish Planning Policy will be incorporated into the National Planning Framework (NPF) and this revised NPF will form part of the statutory development plan. In addition the Planning Act will replace Strategic Development Plans (SDP) with Regional Spatial Strategies (RSS). Clarification on the role and influence of Clydeplan and the future RSS for the Glasgow and Clyde Valley Region will emerge during the lifetime of this plan through Scottish Government transitional arrangements. The Council will continue to monitor progress with this review and emerging national policies and objectives during preparation of LDP2.</i></p>

15	<p><b><u>Policy Context</u></b>  Insert the following as the first paragraph under the 'Clydeplan' section of Regional Policy</p>	<p><b>Regional Policy</b>  <b>Clydeplan</b>  <i>The implementation of the Planning (Scotland) Act 2019 will see Clydeplan replaced by a Regional Spatial Strategy (RSS). The Council will continue to monitor progress in this regard during preparation of LDP2.</i></p>
21	<p><b><u>Spatial Objectives</u></b>  Spatial Objective 3 should be amended to read (revised text in italics)</p> <p>Spatial Objective 3.2 should be amended to read (revised text in italics)</p> <p>Spatial Objective 3.4 should be amended to read (revised text in italics)</p>	<p>3. Promoting a <del>Low-Net</del> <i>Zero Carbon Place</i></p> <p>3.2. To promote sustainable design to provide for energy conservation and generation, ensuring a reduction in carbon emissions and the move towards a <del>low carbon</del> <i>net zero</i> place and economy.</p> <p>3.4. To reduce emissions through prioritisation of <i>low/zero</i> carbon and sustainable transport.</p>
25	<p><b><u>Development Strategy</u></b>  Insert the following text in relation to green networks 1<sup>st</sup> sentence Para 10 (revised text in italics)</p>	<p>The green network is a core component of the Development Strategy, ensuring that important open space, biodiversity and green corridors are protected, connected, <i>enhanced</i> and provided in new developments.</p>
30	<p><b><u>Making it Happen</u></b>  Para 2, change text to read (revised text in italics)</p>	<p>...This includes schools, early learning and childcare facilities; open spaces; <i>transportation</i> infrastructure and services (<i>including road, rail, bus, active travel etc.</i>); utilities; green network linkages...</p>
31	<p><b><u>Strategic Policy 2: Development Contributions</u></b>  Para 4, change text to read (revised text in italics)</p>	<p>Where appropriate...Parks and Open Space; <del>Roads and</del> <i>Transportation infrastructure</i>;...</p>



34	<p><b><u>Schedule 1: City Deal Proposals</u></b> Strat 3.7, insert the following text (revised text in italics)</p>	<p>A railway station, <i>subject to the outcome of the appraisal being undertaken in line with STAG, and bus interchange.....</i></p>
40	<p><b><u>Policy M2.2: M77 Strategic Development Opportunity - Barrhead South - Springhill, Springfield, Lyoncross</u></b> Criterion 2 should be amended to read (revised text in italics)</p>	<p>Provision of a sustainable roads, access and transport strategy, including improved connections to surrounding road, foot and cycle path network and to the Dams to Darnley Country Park, public transport upgrades and roads and transportation improvements, including <i>the potential for a railway station subject to the outcome of the appraisal being undertaken in line with STAG, and bus interchange.....</i></p>
52	<p><b><u>Policy D1: Placemaking and Design</u></b> Criterion 2 should be amended to read (additional text in italics)  Criterion 6 should be amended to read (additional text in italics)</p>	<p>The proposal should be appropriate to its location, be of a high quality and of a size, scale, height, massing, density and <i>layout</i> that is in keeping with the buildings in the locality...  Respond to and complement site topography ...green belt, landscape character <i>and setting...</i></p>
61	<p><b><u>Policy D4: Green Networks and Infrastructure</u></b> Para 4 should be amended to read (revised text in italics)</p>	<p>Where a proposal impacts adversely on the character or function of the green network, proposals <del>may</del> <i>will</i> be required to contribute to enhancing any remaining, or create new green infrastructure and green networks in accordance with Strategic Policy 2 and D6.</p>
62	<p><b><u>Schedule 3: Green Networks and Projects</u></b> Proposal D4.8: Cowdenhall adj. to Crofthead Mil, Neilston Insert the following text after 'Access and woodland planting management' in the description field (revised text in italics)</p>	<p><i>Protection of woodland area and enhancement of the habitat and biodiversity of the area.</i></p>

64	<p><b><u>Policy D5: Protection of Urban Greenspace</u></b>          Para 3 of Policy D5 3<sup>rd</sup> bullet should be amended to read (revised text in italics)</p>	<p>Appropriate mitigation is provided as part of the development for <i>high quality</i> alternative provision <i>within a convenient distance</i> of at least equal biodiversity, community benefit and accessibility.</p>
66	<p><b><u>Policy D7: Natural Environment Features</u></b>          Criterion 1 final sentence should be amended to read (revised text in italics)</p> <p>Criterion 2 should be amended to delete the ‘and’ at the end of part a and replace with ‘or’ (revised text in italics)</p> <p><u>Criterion 3 Para 3 should be amended to read (revised text in italics)</u></p> <p>Criterion 4 Insert Additional Sentence (revised text in italics)</p>	<p>1. Adverse effects on species and habitats should be avoided with mitigation measures provided <i>wherever this is not possible</i>.</p> <p>2a. The objectives of designation and the overall integrity of the area will not be compromised; <del>and</del> <i>or...</i></p> <p><u>“The loss of Ancient or semi-natural woodland, or trees covered by Tree Preservation Orders will not be supported. Ancient woodland is an irreplaceable resource and should be protected from adverse impacts arising from development.”</u></p> <p>4. Where there is likely to be an adverse impact on natural features or biodiversity an ecological appraisal will be required. <i>This appraisal should identify measures adequate to mitigate any such impacts that are identified.</i></p>
67	<p><b><u>Schedule 5: Natural Environment Proposal D7.3: Local Biodiversity Sites Giffnock Scrub</u></b></p>	<p>Adjusting the boundary to incorporate this woodland area within the Giffnock Scrub Local Biodiversity Site.</p>
68	<p><b><u>Sustainable Transport Network and Active Travel</u></b>          The 2<sup>nd</sup> sentence of the fourth paragraph be amended as follows (revised text in italics)</p>	<p>The City Deal infrastructure project will also assist with delivering a range of strategic transport improvements, including <i>the potential for a new train station subject to the outcome of the Barrhead South Accessibility Appraisal, Sustainable Transport Network and Active Travel</i> at the Barrhead</p>

		South SDO and improvements in the road connections between Barrhead and Newton Mearns to improve access to jobs, services and to the Dams to Darnley Country Park.																				
70	<p><b><u>Policy D8: Sustainable Transport Networks</u></b> The third paragraph second sentence of the policy be amended to read (revised text italics)</p>	Proposals will be required to be accessible and permeable by foot and cycle, <i>providing new and enhanced links which and</i> connect to existing <i>and proposed</i> walking, cycling and green networks, as well as to public transport networks.																				
80	<p><b><u>Policy D12: Community and Education Facilities and Infrastructure</u></b> Insert the following text in relation to Para 1 (revised text in italics)</p>	The Council will support the protection and enhancement of existing community, <i>cultural</i> , leisure, health, sports and education facilities.																				
82	<b><u>Schedule 8: Community Facilities</u></b>	Deletion of Proposal D12.8 Kingston Playing Field, Neilston – Community Sport Hub																				
83	<p><b><u>Schedule 9: Education Facilities</u></b> In Schedule 9 add (revised text italics)</p>	<i>FRA: Flood Risk Assessment will be required to determine the developable extent of the site and to ensure that the proposal is consistent with SPP.</i>																				
93	<p><b><u>How Many New Homes are Needed by 2029 2031?</u></b> To ensure the Proposed Plan clearly references the Plan period to 2031 Para 2 Final Sentence should be amended to read</p>	Our requirements are set out in Table 1 ( <del>4350 units 2012-29</del> )																				
93	<p><b><u>Table 1: Housing Supply Targets and Housing Land Requirement 2012 to 2029 2031</u></b>  Table 1 should be deleted and amended</p>	<p><b><u>Table 1: Housing Supply Targets and Housing Land Requirement 2012 to 2031</u></b></p> <table border="1"> <thead> <tr> <th rowspan="2"></th> <th colspan="3"><b><u>Housing Supply Targets (HST)</u></b></th> <th colspan="3"><b><u>Housing Land Requirement (HLR)</u></b></th> </tr> <tr> <th><b><u>2012-24</u></b></th> <th><b><u>2024-31*</u></b></th> <th><b><u>Total 2012-31</u></b></th> <th><b><u>2012-24</u></b></th> <th><b><u>2024-31**</u></b></th> <th><b><u>Total 2012-31</u></b></th> </tr> </thead> <tbody> <tr> <td><b><u>Private / Market</u></b></td> <td>2270</td> <td>1050</td> <td>3320</td> <td>2610</td> <td>1205</td> <td>3815</td> </tr> </tbody> </table>		<b><u>Housing Supply Targets (HST)</u></b>			<b><u>Housing Land Requirement (HLR)</u></b>			<b><u>2012-24</u></b>	<b><u>2024-31*</u></b>	<b><u>Total 2012-31</u></b>	<b><u>2012-24</u></b>	<b><u>2024-31**</u></b>	<b><u>Total 2012-31</u></b>	<b><u>Private / Market</u></b>	2270	1050	3320	2610	1205	3815
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		<b>Social Rent /Below Market Rent</b>	540	322	862	620	366	986				
		<b>All Tenure</b>	2810	1372	4182	3230	1571	4801				
94	<b><u>Housing Supply, Delivery and Phasing</u></b> To ensure the Proposed Plan clearly references the Plan period to 2031 Para 1 1st Sentence should be amended to read	The Background Report and Table 2.....of Clydeplan by 2029 2031.										
95	<b><u>Table 2: Monitoring of Housing Land Supply 2012-2029-2031</u></b>  Table 2 should be deleted and amended	<b><u>Table 2: Monitoring of Housing Land Supply 2012 to 2031</u></b>  <table border="1" data-bbox="824 1270 2069 1369"> <tr> <td data-bbox="824 1270 1223 1369"></td> <td data-bbox="1223 1270 1505 1369"><b>Private</b></td> <td data-bbox="1505 1270 1787 1369"><b>Social Rented/Below Market Rent</b></td> <td data-bbox="1787 1270 2069 1369"><b>All Tenure</b></td> </tr> </table>								<b>Private</b>	<b>Social Rented/Below Market Rent</b>	<b>All Tenure</b>
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Source: Clydeplan and ERC

**Notes to Table 1:**

*Housing Supply Targets (HSTs) (2012 to 2024 and 2024 to 2029) (Schedule 7 Clydeplan)*

*Housing Land Requirement (HLR) (HSTs +15% generosity) (2012 to 2024 and 2024 to 2029) (Schedule 8 Clydeplan)*

*\* Includes HST 2029 to 2031: (Per annum figure Schedule 7 2024-29 980/5 = 196) 2029-31: 196\*2 = 392*

*\*\* Includes HLR 2029 to 2031: 2029-31: HST \*15% = 451*

<i>(a) Housing Supply Targets (HST)</i>	3320	862	4182
<i>(b) Housing Land Requirement (HLR)</i>	3815	986	4801
<i>(c) Completions 2012-19</i>	1507	305	1812
<i>(d) Established Land Supply 2019-2031</i>	2833	703	3536
<i>(e) Total (c+d)</i>	4340	1008	5348
<i>(f) Surplus/Deficit with HST (e-a)</i>	+1020	+146	+1167
<i>(g) Surplus/Deficit with HLR (e-b)</i>	+525	+22	+547

Source: Clydeplan (2017) and ERC Housing Land Audit (2019)

**Notes to Table 2:**

*(a) Housing Supply Targets (Schedule 7 Clydeplan)*

*(b) Housing Land Requirement (HSTs +15% generosity) (Schedule 8 Clydeplan)*

*(d) Established land supply as agreed with Homes for Scotland through the annual Housing Land Audit. This comprises those sites deemed effective during the period 2019 to 2026 and programming of sites 2026 to 2031.*

*\* Comprises sites allocated for 100% SR/BMR under schedule 16 and where SR/BMR capacity known for sites with planning consent. Where a site does not have a current planning consent an assessment has been undertaken to identify the potential affordable provision. However until consent is granted, it is not always possible to confirm the affordable tenure and therefore this figure may change, although the total all tenure supply remains unchanged.*



96

**Policy SG1: Housing Supply, Delivery and Phasing**

To deliver housing needs across all tenures to ~~2029~~ 2031....sustainable mixed communities. Provision is made for ~~a minimum~~ the housing land requirements set out in Table 1 and associated

	To ensure the Proposed Plan clearly references the Plan period to 2031 Para 1 should be amended to read (revised text in italics)	infrastructure to be delivered between 2012- <del>2029</del> to 2031 to comply with the Clydeplan Housing <del>Land Requirements</del> and in accordance with Strategic Policy 1.																
97	<b><u>Affordable and Particular Needs Housing</u></b> Following the last paragraph, insert a new paragraph to read (revised text in italics)	<i>The Council's LHS confirms that there is currently no demand for sites to be allocated for Gypsy / Travellers and Travelling Showpeople. The Council is committed to working with neighbouring Council's to increase our understanding of Gypsy Traveller needs in the local area and our practice in line with national guidance.</i>																
98	<b><u>Policy SG2: Housing Mix</u></b> Paragraph 1 add the following text into the last sentence to read (revised text in italics)  Delete paragraph 2 and insert a new paragraph 2 to read (revised text in italics)	The different types <i>and</i> sizes of housing are required to be well integrated throughout the development.  <i>Proposals should include houses which are adaptable and responsive to a lifetime of needs. In addition to the requirements of building standards, due consideration should be given to unit type, internal room sizes and overall plot size to ensure that units are accessible to as wide a range of people as possible, and that there is potential for future adaptation. This requirement is in addition to the requirements of Policy SG4.</i>																
100 to 103	<b><u>Schedule 15: Housing Sites</u></b> Schedule 15 should be modified to reflect the programming set out in the revised BR2 with the column headings modified as follows (revised text in italics)	<b><u>Schedule 15: Housing Sites</u></b> <table border="1"> <thead> <tr> <th>Site Ref</th> <th>Location</th> <th>Housing market Area (HMA)</th> <th>Type</th> <th>Remaining Capacity</th> <th>Established Land Supply <del>2019-29</del> 2019 to 2031</th> <th>Land Supply Post <del>2029</del> 2031</th> <th>Notes</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Site Ref	Location	Housing market Area (HMA)	Type	Remaining Capacity	Established Land Supply <del>2019-29</del> 2019 to 2031	Land Supply Post <del>2029</del> 2031	Notes								
Site Ref	Location	Housing market Area (HMA)	Type	Remaining Capacity	Established Land Supply <del>2019-29</del> 2019 to 2031	Land Supply Post <del>2029</del> 2031	Notes											
102	<b><u>Schedule 15: Housing Sites</u></b>	Deletion of Proposal SG1.17 Neilston Juniors, Neilston																

104	<p><b><u>Schedule 16: Affordable Housing and Housing for Particular Needs</u></b>  <u>SG4.4: Burnfield Road, Giffnock</u></p>	Adjusting the boundary to reflect land ownership.
111	<p><b><u>Policy SG8: Digital Communications Infrastructure</u></b>  Paragraph 1 should be amended to read (revised text italics)</p>	The Council support the provision and expansion...provided they will not result in a detrimental impact, <i>including cumulative</i> , upon the <i>setting</i> , character or <i>visual amenity</i> of an area.
115	<p><b><u>Policy SG10: Town and Neighbourhood Centre Uses</u></b>  Criterion (2c) should be amended to read (revised text in italics)</p>	Demonstrate that the proposal will help to meet proven qualitative <del>and</del> or quantitative deficiencies.
122	<p><b><u>Sustainable Development and Tackling Climate Change</u></b>  First Para should be amended to read (revised text in italics)</p>	The Scottish Government's commitment to energy reduction and responding to climate change is established in the Climate Change (Scotland) Act 2009 <i>as amended by the Climate Change (Emissions Reduction Targets)(Scotland) Act 2019. The Council supports the Scottish Government's targets of net-zero emissions of greenhouse gasses by 2045 and being carbon neutral by 2040. The policies in this plan make a significant contribution to this aim. The Climate Change Bill aims to increase reduction targets for all greenhouse gases by 2025. This means net-zero emissions of carbon dioxide by 2050 to make Scotland carbon neutral.</i>
124	<p><b><u>Policy E1: Sustainable Design</u></b>  Delete Criterion 2 of Policy E1 and insert replacement criterion.</p>	<p><i>2. Developments should incorporate sustainable and energy efficient design and construction methods and be built to meet a minimum of silver sustainability standard. All new buildings should be designed to ensure that at least 10% of the carbon dioxide emissions reduction standard set by Scottish Building Standards is met through the installation and operation of low and zero-carbon generating technologies. This percentage will increase at the next review of the Local Development Plan. Other solutions will be considered where:</i></p> <p style="padding-left: 40px;"><i>(a) it can be demonstrated that there are significant technical constraints to using on-site low and zero-carbon generating technologies; or</i></p> <p style="padding-left: 40px;"><i>(b) there is likely to be an adverse impact on the historic environment.</i></p> <p><i>This requirement will not apply to:</i></p> <ul style="list-style-type: none"> <li><i>o alterations and extensions to buildings;</i></li> <li><i>o change of use or conversion of buildings;</i></li> <li><i>o ancillary buildings that stand alone and cover an area less than 50 square metres;</i></li> </ul>

		<ul style="list-style-type: none"> <li>○ <i>buildings which will not be heated or cooled, other than by heating provided solely for frost protection;</i></li> <li>○ <i>Buildings which have an intended life of less than two years.</i></li> </ul>
125	<p><b><u>Spatial Framework for Wind Energy Development</u></b> Page 125 3<sup>rd</sup> Para final sentence should be amended to read (revised text in italics)</p>	<p>The spatial framework was <del>also</del> informed by the Council's Wind Energy Study (2012), <i>with Group 3 boundaries excluding land within 2km of the main settlements, Sites of Special Scientific Interest (SSSI) and areas of Class 1 nationally important carbon-rich soils, deep peat and priority peatland habitat.</i></p>
126	<p><b><u>Figure 15 – Spatial Framework for Wind Energy Development</u></b> Figure 15 should be amended to read</p>	<p>Figure 15 – Spatial Framework for Wind Energy Development</p> <p>Key</p> <p>(Unshaded areas) 'Group 2' areas of significant protection from wind energy development. Proposals will require to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation and assessment against the criteria in policy E2.</p> <p> (Purple shaded areas) 'Group 3' areas with potential for wind energy development, where wind energy development is likely to be acceptable subject to detailed consideration against the criteria in policy E2.</p> <p></p>
127	<p><b><u>Policy E2: Renewable Energy</u></b> Para 1 1<sup>st</sup> sentence should be amended to read (revised text italics)</p> <p>Para 2 1<sup>st</sup> sentence should be amended to read (revised text italics)</p> <p>Para 2 3<sup>rd</sup> sentence should be amended to read (revised text italics)</p>	<p>The Council supports low <i>and zero</i> carbon renewable energy proposals in the form of ...</p> <p>Proposals for solar energy, wind <del>farm developments</del> energy, hydroelectric ...</p> <p>Where appropriate, applications will require to <del>submit</del> <i>demonstrate</i> satisfactory mitigation measures to alleviate any adverse impacts.</p>



	<p>Para 3 1<sup>st</sup> sentence should be amended to read (revised text italics)</p> <p>Criterion 12 should be amended to read (revised text italics)</p>	<p>All proposals for low <i>and zero carbon</i> renewable energy developments...</p> <p>12. <del>Impacts</del> <i>Impacts</i> on aviation....</p>
139	<p><b><u>Appendix A1: Glossary</u></b>  Insert the following text into the Glossary after 'Amenity':</p>	<p><b><i>Ancient Woodland</i></b>  '<i>Ancient woodland is a woodland area which has been continuously wooded for hundreds of years, or has had a very short break in woodland cover. Mapping evidence for these types of woodlands in Scotland exists since the 1750s. To determine the antiquity of woodland a range of data should be consulted such as the Ancient Woodland Inventory, the Native Woodland Survey for Scotland, historic OS maps at six inches to the mile available on the National Library of Scotland website, as well as site surveys where there needs to be further confirmation.</i></p>

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<b>Issue 1</b>	<b>General</b>	
<b>Development plan reference:</b>	Section 1: Introduction	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Scottish Natural Heritage (178/1)  Ian Davidson (210/1) (210/3)  James Bennett (234/1) (234/2) (234/4)  Broom, Kirkhill and Mearnskirk Community Council (255/1)  Sean Deakin (402/1)  Mairead Fernandez McCann (407/3) (407/4) (407/5) (407/6)  Woodland Trust Scotland (476/9)  Newton Mearns Flood Group (480/3)  Historic Environment Scotland (482/1)  Scottish Power Renewables (496/2)  SEA Gateway (501/1) (501/2) (501/3)</p>		
<b>Provision of the development plan to which the issue relates:</b>	<p>Section 1: Introduction  What is the Proposed Local Development Plan  Main Public Stages and Timescale for Producing the LDP2  Habitats Directive  Policy Context  Glossary  Pages 7 to 17  Supporting Documents</p> <ul style="list-style-type: none"> <li>• Site Evaluation</li> <li>• Strategic Environmental Assessment</li> <li>• Equalities and Human Rights Impact Assessment</li> <li>• Action Programme</li> <li>• Background Reports</li> </ul>	
<b>Planning authority's summary of the representation(s):</b>		
<p>The representations made to this section have been grouped under the following sub-headings: Introduction, Habitats Regulations, Consultation and LDP Process, Climate Emergency, Glossary, Policy Context and Supporting Documents.</p> <p><b><u>Introduction</u></b></p> <p><b><u>Support</u></b></p> <p><b><u>Broom, Kirkhill and Mearnskirk Community Council (255/1)</u></b></p> <ul style="list-style-type: none"> <li>• Support the concepts expressed within the Introduction and the strong correlation with the recent policy statements expressed by the Scottish Government.</li> </ul>		

**Objections****Habitats Regulations****Scottish Natural Heritage (178/1)**

- The Council consider that there are no likely significant effects on any European sites outwith the Plan area as a result of the Plan. As this screening of the Plan is part of the Habitat Regulations Appraisal (HRA) process and no likely significant effects have been identified, we advise evidencing this in a short document, adding a short introduction and conclusion to the work already carried out. This will ensure it meets the HRA regulation requirements and ensure transparency.

**Consultation and LDP Process****Ian Davidson (210/1)**

- Difficult to understand LDP process - based on outdated rules.
- Local Community Council in limbo and hence lack of opportunity for meaningful community response.

**James Bennett (234/1) (234/2)**

- It would be beneficial if links to the Supporting Strategies and Reports on page 13 titled 'Figure 3: Plans, Programmes and Strategies' of the Proposed LDP2 were provided on the website page.
- It would be desirable if a link to the Councils Risk Management Strategy be provided to help stakeholders understand the Council's risk management approach.

**Sean Deakin (402/1)**

- Objecting to the manner content and form of this consultation. It was held over a general election period so has gone under the radar. Lack of information available.

**Climate Emergency****Ian Davidson (210/3)**

- Climate emergency not reflected in UK, Scottish government or local authorities.

**Glossary****Woodland Trust Scotland (476/9)**

- Suggest an addition to the glossary giving a definition of ancient woodland.

**Policy Context****Scottish Power Renewables (496/2)**

- Request additional wording on review of the Planning system.

## **Supporting Documents**

### **Site Evaluation**

#### **Support**

##### **Newton Mearns Flood Group (480/3)**

- The Flood Group supports East Renfrewshire Council in rejecting site CS066, Ayr Road, Newton Mearns (adjacent to Mearns Primary School) for development. This site is on the unnamed watercourse under Hunter Drive (a tributary of the Capelrig Burn) and is at off-site fluvial flood risk.

#### **Objections**

##### **James Bennett (234/4)**

- Further information is required to explain the scoring used within the Matrix and the overall recommendations/outcomes.

##### **Mairead Fernandez McCann (407/5)**

- Further information required.

## **Strategic Environmental Assessment**

##### **Historic Environment Scotland (482/1)**

- A number of historic environment policies have scored negatively against the environmental criterion of promotion of the use of sustainable material resources. The assessment cites “the use of unsustainable materials in the restoration of historic buildings”. We are unclear as to what is being referred to in terms of “unsustainable” and would therefore consider that the assessment would have benefited from further clarification as to the reasoning behind this finding. We note that the proposed mitigation for this is to encourage “sourcing of more sustainable alternatives and incorporate advice into Guidance”. Our recent report on the current provision, challenges and opportunities for Scotland’s Traditional Building Materials may be beneficial here.

##### **SEA Gateway (501/1) (501/2) (501/3)**

##### **SNH (501/1)**

- Content that the SEA provides a comprehensive assessment
- Recommends changes to two policies (mitigation and monitoring ) to more accurately represent the potential environmental impacts (see below)
- Specific comments:
  - Cumulative Impact Pg. 71: is unclear it should be clearly shown
  - Strategy Pg. 75: specific monitoring measures using indicators are required

- Strategy 3.2 Lavern Link road: requires mitigation measures in response to significant impacts
- Policy M2 Barrhead South: requires specific mitigation measures relating to biodiversity
- Policy 6.4 Dams to Darnley Aurs Rd: no mitigation measures identified
- Policy SG 6.8 Spiersbridge Business Park: requires specific mitigation measures against identified impacts
- Policy SG8 digital Communications: needs to identify potential for landscape impacts and identify mitigation measures
- Policy SG9 Tourism & Economy: symbols in the matrix require updating
- Housing Schedule: Show the assessment of the LDP1 housing sites with mitigation measures.
- Mitigation measures: set out specific mitigation measures which inform the Plan for all sites and polices listed above
- Monitoring Strategy: set out specific indicators relating to the SEA Objectives which could be displayed in simple table

#### Historic Scotland (501/2)

- Generally content with SEA
- Housing Assessment
- The assessment of Housing Impact from the LDP1 should be included
- Mitigation measures should be included in the SEA
- Unclear what is being referred to in the use of sustainable materials assessment where it states that "the use of unsustainable materials in the restoration of historic buildings" this requires clarification.
- Include LDP1 Housing assessment
- Include mitigation measures clarification on "unsustainable materials" in restoration of historic buildings

#### SEPA (501/3)

- Satisfied with the Environmental Report
- Unclear in the matrix which of the rows relate to the site allocations and whether an assessment of all sites has been included.
- Suggest a chapter outlining how the SEA has influenced the proposed LDP2.

#### **Equalities and Human Rights Impact Assessment**

##### Mairead Fernandez McCann (407/4)

- Further detail on Environmental human rights assessment required.

#### **Action Programme**

##### Mairead Fernandez McCann (407/3)

- More detailed action plans required.

#### **Background Reports**

Mairead Fernandez McCann (407/6)

- Queries whether these are related reports.

**Modifications sought by those submitting representations:****Habitats Regulations**Scottish Natural Heritage (178/1)

- Replace references to 'Natura' sites with 'European' designated sites.
- Reference to the 'Directive' is changed to 'Habitats Regulations'.
- Refer to HRA screening process.

**Glossary**Woodland Trust Scotland (476/9)

- Insert definition of Ancient Woodland to Glossary:  
'Ancient woodland is a woodland area which has been continuously wooded for hundreds of years, or has had a very short break in woodland cover. Mapping evidence for these types of woodlands in Scotland exists since the 1750s. To determine the antiquity of woodland a range of data should be consulted such as the Ancient Woodland Inventory, the Native Woodland Survey for Scotland, historic OS maps at six inches to the mile available on the National Library of Scotland website, as well as site surveys where there needs to be further confirmation.'

**Policy Context**Scottish Power Renewables (496/2)

- Insert on page 14 the following after para 1: *National Planning Framework 4 (NPF4) will be developed within the lifetime of this plan and the proposed plan will be reviewed to ensure alignment with emerging national policies and objectives. Net zero targets and the climate emergency will be key features of NPF4 and should be identified within this section of the final LDP2.*
- On page 14 remove the following text: *The Scottish Government is currently undertaking a review of the Planning System which will introduce changes to legislation, development plans and development management systems and processes. This includes an updated NPF and SPP. The Council will monitor progress with this review during preparation of LDP2.* And replace with the following: *The Scottish Government review of the planning system has been completed and the Planning (Scotland) Act 2019 has been implemented. The new Act will ensure significant changes to the planning system, including the incorporation of revised Scottish Planning Policy into NPF4. These changes will be reflected in amended versions of ERC's LDP2.*
- On page 15 after para 3 insert the following: *The Planning (Scotland) Act 2019 has replaced Strategic Development Plans (SDP) with Regional Spatial Strategies (RSS). Clarification on the role and influence of Clydeplan and the RSS will emerge during the lifetime of this plan through Scottish Government transitional*

*arrangements. The proposed plan will be reviewed and updated to ensure alignment with national policy and objectives.*

### **Summary of responses (including reasons) by planning authority:**

As detailed above, the representations made to this section have been grouped under the following sub-headings: Introduction, Habitats Regulations, Consultation and LDP Process, Climate Emergency, Glossary, Policy Context and Supporting Documents.

#### **Introduction**

#### **Support**

##### **Broom, Kirkhill and Mearns Kirk Community Council (255/1)**

- The Council acknowledges and welcomes the supporting comments.
- It is not proposed to modify the Plan based upon the above.

#### **Objections**

#### **Habitats Regulations**

##### **Scottish Natural Heritage (178/1)**

- The Council has considered whether the LDP2 should be subject to Habitats Regulations Appraisal. To determine if an appraisal is required the Council followed the procedures required by regulations 48 and 85b of the Habitats Regulations, and considered the following questions:
  - Is the Plan directly connected with or necessary to the nature conservation management of a European site.
  - Would the plan be likely to have a significant effect on a European site or a European Offshore Marine Site either alone or in combination with other plans or projects?
- The Council's response to the above two tests is that the LDP2 is not directly connected with or necessary to the nature conservation management Natura site. Nor does the LDP2 adversely affect the integrity of a Natura site. In accordance with the guidance there is no requirement to carry out further assessment under the Habitats Regulations Appraisal (HRA).
- In reaching this conclusion the Council has followed Stage 1 of SNH's recommended approach to methodology and reporting as detailed in the Habitats Regulations Appraisal of Plans Guidance for plan-making bodies in Scotland (2015). Further information is set out in the Habitats Regulations Appraisal document (CD/@@).
- The Council agrees with the suggested text and amendments proposed and agrees to add additional text on the HRA process. If the Reporter is so minded to recommend that the representation from SNH is accepted and the Plan modified, as set out below, the Council would be supportive of this modification.
- Habitats Directive header should be amended to read (revised text in italics):
  - 'Habitats *Directive Regulations*'
- 1st Para should be amended to read (revised text in italics):



- *A Habitats Regulations Appraisal (HRA) determines whether a plan or project should be subject to appraisal; outlines the 'screening' process for determining whether an appropriate assessment is required, as well as, any appropriate assessment. The screening Stage of the Habitats Regulations Appraisal screens the plan for likely significant effects on European sites. The Council has determined, that in the area covered by the Local Development Plan there are no Special Areas of Conservation or Special Protection Areas and there are no other *Natura 2000 sites European' designated sites* located outwith the East Renfrewshire area which are likely to be affected by the strategies, policies or proposals in the Plan and as a result a HRA is not required.*
- 2<sup>nd</sup> Para should be amended to read (revised text in italics):
  - Any future proposals or changes to the Plan which have the potential to have an adverse effect on the integrity of any *Natura 2000 site European' designated sites* will be subject to a Habitats Regulations Appraisal (HRA) in accordance with the Habitats Directive.

### **Consultation and LDP Process**

Ian Davidson (210/1), Sean Deakin (402/1)

- Concerns were expressed regarding the complexity of the LDP process and the quality and timing of the consultation process involved.
- The strategic policy framework for the policies in the Plan is contained in national, National Planning Framework3 (NPF3) (CD/@@) and Scottish Planning Policy (SPP) (CD/@@) and regional guidance in Clydeplan (SDP) (CD/@@). Each of these levels of the strategic policy framework are summarised under the 'Policy Context' section (pages 12-17) of the Proposed Plan.
- Circular 6/2013 - Development Planning (CD/@@) sets out the form and content of Local Development Plans. Central to the preparation of the LDP has been the significant consultation and engagement with a range of stakeholders.
- Each key stage of the process has been approved by the Council and subject to consultation which exceeds the statutory minimum. The 2019 Development Plan Scheme (DPS) (CD/@@) includes a participation statement which set how and when anyone could become involved and the publicity and consultation that was to be undertaken for the Proposed Plan. It also sets out the consultation that was undertaken for the earlier Main Issues Report stage.
- The extent of consultation undertaken is set out in the Report of Conformity (CD/@@) and which clearly shows that the Council has met and in many cases significantly exceeded the minimum statutory consultation requirements. It is considered that there have been various opportunities and methods of communication, consultation and engagement for communities to shape the Plan and provide comment at the different stages of the plan making process. For example an 8 week consultation period for the Proposed Plan rather than the 6 week minimum; Drop in Sessions; Social Media; Use of Posters and events with Primary and Secondary School Children.
- The Proposed Plan has been prepared following extensive consultation with a range of stakeholders, including with key agencies such as Transport Scotland, the Strathclyde Partnership for Transport, Scottish Natural Heritage, Scottish Water, the Scottish Environment Protection Agency, the Health Boards, Community

Councils, other council departments such as education and the roads service, community groups and the wider public.

- The Council recognises the complexity of the LDP process. The Council has aimed to ensure that the layout of the documentation and supporting Proposals Maps are as user friendly, easy to interpret and accessible as possible and has attempted to incorporate a range of presentational techniques to assist this. In particular the use of the ESRI software and interactive Story-maps have greatly assisted with meeting this objective.
- It is not proposed to modify the Plan based upon the above.

#### James Bennett (234/1) (234/2)

- Links to the suite of Council Plans, Programmes and Strategies shown in Figure 3 of the Proposed Plan are available on the Councils website, where available. The Economic Development and Inclusive Growth Strategy, Local Transport Strategy (LTS), Adaptations Strategy and Local Heat and Energy Efficiency Strategy are all emerging strategies and will appear on the Councils website in due course. Information on other Regional and National documents can be found on their relevant websites.
- The Councils Risk Management strategy can be viewed on the Councils website. It is not viewed necessary to include a link to this document within the Proposed Plan.
- It is not proposed to modify the Plan based upon the above.

### Climate Emergency

#### Ian Davidson (210/1)

- Reducing carbon emissions and adapting to climate change is identified in SPP as one of the four outcomes that the planning system should set out to achieve. Net zero targets and the climate emergency are fully addressed under Issues 31 and 32.
- The introductory sections to the Proposed Plan and Spatial Objective 3 clearly reference the requirement to move towards a zero carbon place and economy.
- It is not proposed to modify this section of the Plan based upon the above.

### Glossary

#### Woodland Trust Scotland (476/9)

- To provide greater clarity to the Proposed Plan the Council is supportive of a definition of Ancient woodland being added to the glossary. If the Reporter is so minded to recommend that the representation is accepted and the Plan modified, as set out below, the Council would be supportive of this modification.
- Insert the following text into the Glossary after 'Amenity':
  - **Ancient Woodland**  
*'Ancient woodland is a woodland area which has been continuously wooded for hundreds of years, or has had a very short break in woodland cover. Mapping evidence for these types of woodlands in Scotland exists since the 1750s. To determine the antiquity of woodland a range of data should be*

*consulted such as the Ancient Woodland Inventory, the Native Woodland Survey for Scotland, historic OS maps at six inches to the mile available on the National Library of Scotland website, as well as site surveys where there needs to be further confirmation.'*

## **Policy Context**

### **Scottish Power Renewables (496/2)**

- The Council agrees that the Proposed Plan requires to be amended to more accurately reflect progress with the Planning (Scotland) Act 2019. The Council does not support the wording proposed, however, the Council is supportive of the following modifications.
- Delete the final para on page 14 and replace with the following text to be inserted below the heading 'National Policy' as follows:
  - **National Policy**  
*The Planning (Scotland) Act 2019 has introduced a significant number of changes to legislation, spatial planning and development management processes. Scottish Planning Policy will be incorporated into the National Planning Framework (NPF) and this revised NPF will form part of the statutory development plan. In addition the Planning Act will replace Strategic Development Plans (SDP) with Regional Spatial Strategies (RSS). Clarification on the role and influence of Clydeplan and the future RSS for the Glasgow and Clyde Valley Region will emerge during the lifetime of this plan through Scottish Government transitional arrangements. The Council will continue to monitor progress with this review and emerging national policies and objectives during preparation of LDP2.*
- Insert the following as the first paragraph under the 'Clydeplan' section of Regional Policy on page 15 as follows:
  - **Regional Policy**  
**Clydeplan**  
*The implementation of the Planning (Scotland) Act 2019 will see Clydeplan replaced by a Regional Spatial Strategy (RSS). The Council will continue to monitor progress in this regard during preparation of LDP2.*

## **Supporting Documents**

Representations were received to documents that accompany but do not form part of the Proposed Plan or this Examination. However, to ensure all matters are addressed the points raised have been acknowledged and responded to in the following sections.

## **Site Evaluation**

### **Support**

#### **Newton Mearns Flood Group (480/3)**

- The Council acknowledges the support for the scoring and findings of the Site Evaluation.
- It is not proposed to modify the Plan based upon the above.

## **Objections**

James Bennett (234/4), Mairead Fernandez McCann (407/5)

- Representations objected to the scoring and findings of the Site Evaluation (CD/@@) and Strategic Environmental Assessment (SEA) (CD/@@).
- The site evaluation study was prepared to assist with the identification of sites to be included in the Proposed Plan. The assessment methodology along with the SEA, together provide a consistent, robust and objective framework for the assessment of land use proposals. The site evaluation methodology is thorough and robust and provides a fair and consistent method of ranking and comparing alternative sites.
- This approach has been applied consistently across all sites and has been agreed as an accepted methodology by Reporters at previous LDP examinations. The Council stands by the outcomes of these exercises.
- It is not proposed to modify the Plan based upon the above.

**Strategic Environmental Assessment**

- The Council acknowledges and welcomes the supporting comments from the SEA Gateway Authorities.
- The SEA clearly identifies environmental effects on policies and proposals and potential mitigation measures. It is acknowledged that further information on mitigation would be beneficial. The Council is of the view that the SEA has had a positive effect on the preparation of the Proposed Plan. Comments from the SEA gateway and other organisations will inform the next stage of the SEA process.
- The next stage of the SEA will be informed by these comments.

**Equalities and Human Rights Impact Assessment**Mairead Fernandez McCann (407/4)

- The Council is of the opinion that the document clearly considers the potential consequences of policies and proposals on identified equality groups.
- It is not proposed to modify the Plan based upon the above.

**Action Programme**Mairead Fernandez McCann (407/3)

- The Action programme clearly sets out the timescales and actions as to how the policies and proposals will be delivered and implemented over the short, medium and longer term.
- It is not proposed to modify the Plan based upon the above.

**Background Reports**Mairead Fernandez McCann (407/6)

- The Background Reports inform and provide further detailed technical information to support the policies and proposals contained within the Proposed Plan.
- It is not proposed to modify the Plan based upon the above.

<b>Reporter's conclusions:</b>
<b>Reporter's recommendations:</b>

<b>Issue 2</b>	<b>Development Strategy</b>	
<b>Development plan reference:</b>	Development Strategy	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Tracy Rowan (65/1)  GoBike (174/1)  Scottish Natural Heritage (178/2)  Woodland Trust Scotland (376/1)  Persimmon Homes (382/3) (384/3) (397/2)  Laura Wiggins (385/2)  Jackson Carlaw MSP (428/6)  Miller Homes (463/10)  Cala Homes (West) (464/9)  CALA Homes (West) and Lynch Homes (467/2)  Aldi Stores (474/4)  Homes for Scotland (476/11)  Historic Environment Scotland (482/2)  Wallace Land Investments (489/10)  Scottish Power Renewables (496/3)  Gladman Developments Ltd (503/6), (503/8), (571/7)  Avant Homes (504/10)  Lynch Homes (505/4)</p>		
<b>Provision of the development plan to which the issue relates:</b>	Section 2: Managing and Enabling Growth Development Strategy Spatial Objectives Strategic Policy 1: Development Strategy	
<b>Planning authority's summary of the representation(s):</b>		
<p><b><u>Support</u></b></p> <p><u>GoBike (174/1)</u></p> <ul style="list-style-type: none"> <li>• Welcome the document's stated aspirations to ensure that East Renfrewshire is a thriving, attractive and sustainable place to live, work, and visit, and to move towards a low carbon place and economy. Active travel is an essential part of meeting this challenge.</li> </ul> <p><u>Woodland Trust Scotland (376/1)</u></p> <ul style="list-style-type: none"> <li>• This is the best LDP we have seen this year compared to other local authorities across Scotland, covering a comprehensive range of policies aiming to balance, economic, social and environmental pillars. We are generally supportive of most policies.</li> </ul> <p><u>Aldi Stores (474/4)</u></p>		

- Support these priorities within the LDP. Aldi consider that they are already contributing to the delivery of these objectives through their current store estate and future expansion plans within the area.

#### Historic Environment Scotland (482/2)

- We are grateful for the opportunity to comment on the draft proposed plan prior to consultation. As a result of this we welcome that our recommendations in relation to the policy framework have been acted upon. We also note that the spatial strategy for housing is being carried forward from the previous Local Development Plan. We can therefore confirm that we are content with the proposed plan.

#### NHS Greater Glasgow (500/1)

- Support the Spatial objectives and development strategy and in particular the proposal to recognise the importance of health and well-being as part of this strategy.

#### **Objections**

##### Tracy Rowan (65/1)

- Objects to loss of greenspace.
- No need for additional housing.
- Pressure on local amenities (schools, doctors & utilities).

##### Scottish Natural Heritage (178/2)

- In relation to green networks (page. 25), enhancement should also be promoted.
- Figure 6: Key Diagram should be amended to distinguish the existing green network and opportunities for new/enhanced provision.

##### Persimmon Homes (382/3) (384/3) (397/2)

- One of the key strategic objectives of the proposed LDP is to 'provide new homes across all tenures which meet the needs of the local community'; however, lack of new housing sites has meant the Proposed Plan has failed to address the affordability issue and in doing so has not met the housing needs of the community which is contrary to this strategic objective.
- The Proposed Plan 'aims to create thriving, attractive and sustainable places and neighbourhoods that provide for the younger generation, so they can live and work in the area they grew up in, provide homes and facilities for families and individuals moving into the area and enable older people to live independently in their own homes for longer'. However, by providing no new additional housing sites East Renfrewshire Council have completely gone against this aim.

##### Laura Wiggins (385/2)

- Support plans objective of creating thriving attractive sustainable communities.

- Difficult to achieve given competing priorities to provide housing which allows for sufficient infrastructure roads, schools, health services, but not at the expense of greenspace within the community.

#### Jackson Carlaw MSP (428/6)

- Healthcare infrastructure requires a specific section in the LPD2.

#### Miller Homes (463/10), Cala Homes (West) (464/9), Wallace Land Investments (489/10), Avant Homes (504/10), Lynch Homes (505/4)

- Objection that the Proposed LDP2 does not include any new housing sites based upon justification that there is insufficient education capacity to support additional residential allocations.

#### CALA Homes (West) and Lynch Homes (467/2)

- Object to Strategic Policy 1 on the basis that the Council's development strategy - in terms of housing release and education planning - is overly restrictive and inflexible.
- The approach is at odds with the Council's spatial strategy which should be to support the consolidation and regeneration of existing urban areas, alongside controlled edge of settlement growth; it prevents new development coming forward in 'pockets' of the Council area where education pressures are not significant (i.e. where schools have remaining capacity) and approach fails to take into account the phasing plans being proposed by prospective developers.

#### Homes for Scotland (476/11)

- LDP2 strategy represents an unfortunate reversal of the preferred option at the MIR stage which would have seen modest new housing allocations. New allocations would augment the existing spatial strategy and provide much needed additional homes of all tenures.
- Failure to do so is inconsistent with the requirement to plan for sustainable economic growth in SPP.

#### Scottish Power Renewables (496/3)

- In Spatial Objective 3 the LDP2 should emphasise net zero targets to ensure alignment with renewable energy objectives

#### Gladman Developments Ltd (503/6) (503/8) (571/7)

- Support and endorse Homes for Scotland submission.
- Council are required to make significant modifications to the Proposed Plan prior to it being submitted for Examination
- The Council's approach to housing does not support the delivery of the Spatial Objectives, particularly in relation to creating sustainable places and communities, and promoting sustainable and inclusive economic growth.
- Strategic Objective (point 2.4) is key to ensure the Council deliver on the objective to promote sustainable & inclusive economic growth. The Council's proposed



strategy towards housing specifically not identifying any new housing is not sustainable and will exacerbate issues of affordability of housing.

- It is imperative that the Council amend the strategy towards housing, as the objectives set cannot be achieved without identifying new allocations for private and affordable housing, to provide a range and choice of housing.
- In terms of education the Council have identified that there is significant pressure on the existing school estate and do not control any land to address this need. This need must be addressed within this LDP2 and suitable sites for new schools must be identified. It is essential that the Council identify a willing landowner, developer, promoter to include provision for a new school with a site promoted within LDP2.
- Gladman's proposed site at Glasgow Road, Waterfoot (Site Ref: CS039) is a suitable opportunity to provide new housing, a neighbourhood school and a new primary school.
- Generally support the objectives for LDP2, however the current strategy towards housing and education does not help to achieve these objectives, therefore it is currently flawed.

#### **Modifications sought by those submitting representations:**

##### Scottish Natural Heritage (178/2)

- Inserting the following text in relation to green networks (p. 25): "The green network is a core component of the Development Strategy, ensuring that important open space, biodiversity and green corridors are protected, connected, *enhanced* and provided in new developments."
- Recommend amending the key for Figure 6: Key Diagram (p. 27) to distinguish the existing green network and opportunities for new/enhanced provision.

##### Jackson Carlaw MSP (428/6)

- Healthcare infrastructure requires a specific section in the LPD2.

##### Scottish Power Renewables (496/3)

- On Page 21 amend the title of Spatial Objective 3, Objective 3.2 and Objective 3.4 to replace low carbon with net zero.

##### Persimmon Homes (382/3) (384/3) (397/2), Laura Wiggins (385/2), Miller Homes (463/10), Cala Homes (West) (464/9), Homes for Scotland (476/11), Wallace Land Investments (489/10), Avant Homes (504/10), Gladman Developments Ltd (503/6) (503/8) (571/7)

- Recommend the Council's strategy to housing and education be amended with new sites being identified for private and affordable housing.

#### **Summary of responses (including reasons) by planning authority:**

##### **Support**

GoBike (174/1), Woodland Trust Scotland (376/1), Aldi Stores (474/4), Historic Environment Scotland (482/2), NHS Greater Glasgow (500/1)

- The Council acknowledges and welcomes the supporting comments in relation to the strategy of the Plan. Support for the Plans economic, social and environmental focus from the Woodland Trust Scotland, support for active travel emphasis from GoBike and comments from NHS on the Plans emphasis on health and well-being are particularly welcomed.
- It is not proposed to modify the Plan based upon the above.

### **Development Strategy**

Persimmon Homes (382/3) (384/3) (397/2), Laura Wiggins (385/2), Miller Homes (463/10), Cala Homes (West) (464/9), Homes for Scotland (476/11), Wallace Land Investments (489/10), Avant Homes (504/10), Gladman Developments Ltd (503/6) (503/8) (571/7)

- A number of objections were received regarding the Development Strategy of the Proposed Plan with concerns raised over the Plans restrictive approach towards new Housing allocations and Education provision. It is worth noting that neither the Scottish Government nor any of the Key Agencies or infrastructure providers have raised any significant concerns with the Development Strategy or any significant infrastructure issues with sites allocated in the Proposed Plan.
- Paragraph 48 of Scottish Planning Policy (SPP) (CD/@@) states that '*local development plans should be based on spatial strategies that are deliverable, taking into account the scale and type of development pressure and the need for growth and regeneration*'.
- The Council commenced a review of the adopted LDP1 (CD/@@) and started the preparation of LDP2 in October 2016 with the publication of the Main Issues Report (MIR) (CD/@@) for consultation. The MIR set out the Council's preferred options and possible alternatives. Two development strategy options were identified in the MIR to explore how and where future development could best be accommodated and to meet the housing requirements of SPP and the approved Strategic Development Plan 'Clydeplan' (2017) (CD/@@). The 2 options were as follows:
  - Option 2A – Consolidation, Regeneration and controlled edge of settlement growth; and
  - Option 2B – Consolidation and Regeneration.
- The MIR identified 'Option 2A' consolidation, regeneration and controlled edge of settlement growth as the preferred strategy. This promoted limited expansion of settlements. In that context the MIR identified 13 sites as new preferred housing sites with a total estimated capacity of 1050 units. Option 2B sought to retain the existing green belt boundaries set out in LDP1 and did not promote any new residential development outside the current urban areas.
- Meeting educational needs was raised in the MIR as a key issue for LDP2. In preparing the Proposed Plan further detailed research and analysis was undertaken to inform long term planning of educational infrastructure and understanding of requirements.
- The Council has clearly evidenced the strategic approach taken for the Proposed Plan and its approach to current and future education provision and mitigation in the Education Background Report (BR4) (CD/@@) and other Council Reports. The long term strategic analysis undertaken has clearly shown that further housing releases would have major impacts upon the existing education infrastructure across all sectors and both the Leven Valley and Eastwood areas; and that there is no viable solution to provide sufficient additional education places to accommodate the further housing releases as originally proposed in the LDP2 MIR. The existing schools will support LDP1 and approved windfall development however any

additional housing would cause capacity problems within the school estate. Attempts to identify potential school locations within the Eastwood area have so far been unsuccessful as the availability of sites is extremely limited. The Council owns little land in the Eastwood area and certainly no land appropriate for this purpose. Discussions with landowners and developers are continuing.

- The Council has provided a detailed response on this matter under Issue 13 and acknowledges the need to continually monitor the demand for education places and address future education infrastructure requirements.
- The Development Strategy included in the Proposed Plan reflects the results of this process and analysis. The Development Strategy provides the framework for managing change and shaping how the area will develop in the future. The focus is on regeneration and consolidation of the urban areas and the enhancement of existing places centred around 3 spatial objectives. The Proposed Plan is focused on delivering sustainable and inclusive economic growth and a move towards a low carbon place and economy and seeks to direct all new development to the urban area, which is considered to be the most sustainable option. This approach is in line with the 'compact city' approach and vision set out in the Clydeplan.
- No additional housing releases or amendments to the green belt boundary were proposed. Green belt boundaries are particularly important in directing development to the right locations to achieve the overall objectives of the Plan.
- The green belt boundary was reviewed during the preparation of the adopted LDP1 (CD/@@) utilising the principles in SPP. It set out a sustainable, robust and defensible boundary, providing a defence to unplanned growth and reflecting a long term settlement strategy.
- An updated Green belt and Landscape Character Assessment was undertaken in 2016 and has informed the Strategy and green belt boundary for the Proposed Plan. Further information is set out in Green Belt Landscape Character Assessment (CD/@@), the Green Belt Landscape Character Assessment Background Report (BR2) (CD/@@) and under Issue 8.
- It is considered that the green belt boundary accords with the principles and requirements of SPP and Clydeplan, and that it remains an important element of the Proposed Plans Development Strategy.
- The development strategy will support the creation of sustainable mixed communities to help to ensure the continued delivery of new housing in accordance with paragraph 122 of SPP and with Clydeplan. The policies in the Proposed Plan offer flexibility to support the delivery of new homes alongside the redevelopment of brownfield land. The Proposed Plan provides a sufficient mix of brownfield and greenfield sites to comply with SPP. The Council also maintains that the Proposed Plan makes adequate provision for housing including affordable housing through the provision of a generous supply of land.
- There remains considerable pressure for development in the Green Belt surrounding both the urban and rural settlements. As set out under Issues 20 to 27 there has been a range of alternative housing locations promoted. None of the 31 alternative proposals are being recommended by the Council for inclusion in the Proposed Plan. Proposals have been evaluated through the Site Evaluation (CD/@@) at relevant stages.
- The Council is of the view that allowing additional new housing sites in the green belt would be contrary to the vision and strategy of the Proposed Plan, and would direct development away from the strategic master planned areas and other urban housing sites.
- As the Proposed Plan already provides a generous housing land supply, as demonstrated under Issue 14, there is no numerical or policy justification for

additional sites to be identified to meet housing needs. If further sites do come forward they can be assessed against Strategic Policy 1 and Policy SG1.

- Delivery of the development strategy and the housing requirements of the Proposed Plan will be achieved through a continued focus upon development within the urban areas, together with the established housing sites within the land supply including the 3 Strategic Development Opportunities at Newton Mearns (Policy M2.1- Malletsheugh/Maidenhill, Newton Mearns (Policy M2.1) and at Barrhead South (Policy M2.2) and a major regeneration proposal at Barrhead North, Glasgow Road/Shanks Park (Policy M3).
- The Strategic Development Opportunities are intended to deliver not only private sector housing, but also affordable and particular needs housing, employment opportunities, neighbourhood scale retail development, community/ leisure/ educational/ religious facilities, transport network and public transport improvements across the council area, the upgrading of vacant land and enhancements to the Dams to Darnley Country Park. These areas will be the primary focus for growth throughout the Plan period. In the rural settlements, development will be limited to infill only, focussing on meeting local identified needs.
- Central to the Proposed Plan's overall approach is ensuring that site delivery is phased and monitored to assess the impact upon existing infrastructure and ensure infrastructure is in place or will be provided through Strategic Policy 2: Development Contributions.
- As discussed under Issue 14, and if the Reporter is in agreement the Council would also be supportive of the plan period being revised to cover the period 2021 to 2031. This would ensure compliance with Para 119 of SPP which states that Local Development Plan's '*should allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected date of adoption*'. It is recommended that references to 2029 and beyond are revised to '*2031 and beyond*'.
- Gladman's proposed site at Glasgow Road, Waterfoot is discussed under Issue 27.
- The Council is strongly of the view that the Proposed Plan is in compliance with Clydeplan and SPP and that the development strategy and supporting policies and proposals provide a strong framework that will deliver the three spatial objectives of the Plan.
- It is not proposed to modify the Plan based upon the above.

### **Greenspace**

#### Tracy Rowan (65/1)

- The Proposed Plan promotes a compact strategy of consolidation and regeneration of the urban areas alongside a focus on protecting green spaces. The Proposed Plan seeks to protect, enhance and increase the amount and quality of greenspaces. This is clearly evidenced in Spatial Objective 1.4, Strategic Policy 1 and Policy D5.
- It is not proposed to modify the Plan based upon the above.

### **Healthcare**

#### Jackson Carlaw MSP (428/6)

- The Council notes the request for the creation of a specific policy section towards healthcare facilities. The Proposed Plan aims to ensure that health and well-being are recognised as a core component of the Development Strategy. Health facilities and healthy lifestyles are strongly referenced in Spatial Objectives 1.1 and 1.6.
- Following receipt of comments from NHS Greater Glasgow and East Renfrewshire HSCP and the letter received from the Cabinet Secretary for Health and Sport and Minister for Local Government, Housing and Planning, the Council are committed to carrying out future analysis with our community planning partners to consider the capacity required to support future demand for healthcare infrastructure. This is outlined further under Issue 3 and clearly stated within Strategic Policy 2: 'Development Contributions'.
- The Proposed Plan seeks to provide new health facilities to meet future needs and ensure new facilities are integrated and accessible to local communities through Strategic Policy 2 and Policy D12.
- The Council maintains that the Proposed Plan strongly recognises the importance of health and well-being.
- It is not proposed to modify the Plan based upon the above.

### **Green Network**

#### **Scottish Natural Heritage (178/2)**

- The Council agrees with the amendment proposed. If the Reporter is so minded to recommend that the representation from Scottish Natural Heritage is accepted and the Plan modified, as set out below, the Council would be supportive of this modification.
- Insert the following text in relation to green networks (page. 25) 1<sup>st</sup> sentence Para 10 (revised text in italics):
  - The green network is a core component of the Development Strategy, ensuring that important open space, biodiversity and green corridors are protected, connected, *enhanced* and provided in new developments.

### **Key Diagram**

#### **Scottish Natural Heritage (178/2)**

- The key diagram shows broad locations for development. The symbols are indicative and do not represent precise locations or sites. Opportunities for new/enhanced green network provision are shown in Schedule 3 and on the Proposals Map. It is not viewed necessary to replicate all proposals on the key diagram.
- It is not proposed to modify the Plan based upon the above.

### **Spatial Objectives**

#### **Scottish Power Renewables (496/3)**

- Reducing carbon emissions and adapting to climate change is identified in SPP as one of the four outcomes that the planning system should set out to achieve.
- The Council agrees with the amendments proposed. If the Reporter is so minded to recommend that the representation from Scottish Power Renewables is accepted

and the Plan modified, as set out below, the Council would be supportive of these modifications.

- Spatial Objective 3 should be amended to read (revised text in italics):  
3. Promoting a *Low-Net Zero Carbon Place*
- Spatial Objective 3.2 should be amended to read (revised text in italics):  
3.2. To promote sustainable design to provide for energy conservation and generation, ensuring a reduction in carbon emissions and the move towards a *low-carbon net zero place and economy.*
- Spatial Objective 3.4 should be amended to read (revised text in italics):  
3.4. To reduce emissions through prioritisation of *low/zero carbon and sustainable transport.*

**Reporter's conclusions:**

**Reporter's recommendations:**

<b>Issue 3</b>	<b>Development Contributions</b>	
<b>Development plan reference:</b>	Strategic Policy 2: Development Contributions	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>East Renfrewshire Council Education Department (170/2)  Network Rail (475/4)  Homes for Scotland (476/7)  Robertson Homes (495/3)  Scottish Government (486/10)  NHS Greater Glasgow (500/2)</p>		
<b>Provision of the development plan to which the issue relates:</b>	Section 2: Managing and Enabling Growth	
<b>Planning authority's summary of the representation(s):</b>		
<p><b><u>Support</u></b></p> <p><u>East Renfrewshire Council Education Department (170/2)</u></p> <ul style="list-style-type: none"> <li>• Support for Development Contribution policy and Strategic Policy 2 to provide support for new education infrastructure and ensure infrastructure is in place at the right time.</li> </ul> <p><u>Network Rail (475/4)</u></p> <ul style="list-style-type: none"> <li>• Network Rail welcomes the approach of LDP2 and the commitment to developer contributions for a range of infrastructure provision, services or facilities.</li> </ul> <p><b><u>Objections</u></b></p> <p><u>Network Rail (475/4)</u></p> <ul style="list-style-type: none"> <li>• Recommend that “roads and transportation” is quantified to include road and rail infrastructure to ensure that contributions benefit the wider transport infrastructure and not just road-based. We note that this is clarified in the supplementary guidance (p14) but reference to it should also be made in the LDP policy also.</li> <li>• Network Rail should be clearly excluded from having to make developer contributions as an arm’s length body of the Department for Transport (DfT) publicly owned company.</li> </ul> <p><u>Homes for Scotland (476/7), Robertson Homes (495/3)</u></p> <ul style="list-style-type: none"> <li>• Homes for Scotland does not believe that any burden should be placed on the developer through a developer obligation to contribute wholly or proportionately</li> </ul>		

towards the capital costs of delivering a GP practice to a centrally funded Health Board who may be the end owner or tenant of the premises, or to a private business owning, leasing or operating such a facility.

- The burden to cover any funding shortfall that may hinder the provision of new primary healthcare facilities should not fall to the development industry. Further, primary healthcare provision should not be for the Council to provide for, nor should it be for developer contributions to meet the cost of any necessary facilities.

#### Scottish Government (486/10)

- In accordance with Paragraph 139 of Planning Circular 6/2013 which states that *“matters that should not be included in Supplementary Guidance, but be within the plan, include: items for which financial or other contributions, including affordable housing, will be sought, and the circumstances (locations, types of development) where they will be sought”*, and to give a greater degree of clarity within the plan on the nature of developer contributions.

#### NHS Greater Glasgow (500/2)

- Object to Strategic Policy 2 which relates to proposed developer contributions.
- NHS GGC & ERHSCP request the creation of a specific policy context which requires developer contributions towards healthcare facilities.
- NHS GGC & ERHSCP are concerned that healthcare is not included in the list of facilities where DC's may be sought.
- Strategic Policy 2 makes a commitment to consider future demand for healthcare infrastructure, this is welcomed but it does not provide sufficient reassurance that developer contributions will become a requirement.
- The current medical facilities will not meet the needs of residents in new developments. Barrhead Health and Care Centre is at capacity as is Newton Mearns.

### **Modifications sought by those submitting representations:**

#### Network Rail (475/4)

- At paragraph 4 on p31 amend the text as follows: "and Sports); Parks and Open Space; Roads and Transportation (*including rail infrastructure*) Active travel; and Green Infrastructure."

#### Homes for Scotland (476/7), Robertson Homes (495/3)

- Reference to healthcare should be removed.

#### Scottish Government (486/10)

- Further detail should be provided in the plan in relation to the items for which developer contributions will be sought and the circumstances in which they will be sought, for example, with specific reference to policies M2, M2.1, M2.2 and M3, relating to strategic development opportunities.

#### NHS Greater Glasgow (500/2)



- Request a specific policy which provides explicit recognition for the contributions towards healthcare facilities.

### Summary of responses (including reasons) by planning authority:

The Council works closely with key agencies, the development industry and infrastructure providers to ensure that developments included in the Proposed Plan have sufficient levels of infrastructure and services or any deficits can be addressed by the development.

#### Support

##### East Renfrewshire Council Education Department (170/2), Network Rail (475/4)

- The Council acknowledges and welcomes the support for the Council's commitment to developer contributions for a range of infrastructure provision, services or facilities.
- It is not proposed to modify the Plan based upon the above.

#### Objections

##### Network Rail (475/4)

- The Council considers that Strategic Policy 2 sets out a clear framework for development contributions. It is not considered necessary to quantify the term "roads and transportation" to specifically reference rail, as the term transportation would cover this and a number of other forms of transport. In addition further detailed information and guidance is provided in the Council's existing Development Contributions Supplementary Planning Guidance (SPG) (CD@@), which the Council intends to update to support LDP2.
- All new development must be accompanied by appropriate infrastructure and services required to support new or expanded communities. Further detailed information and guidance is provided in the Development Contributions SPG, which advises that the policy will apply to residential development of 4 or more units and non-residential developments of over 1000m<sup>2</sup>. Development Contributions will fairly and reasonably relate in scale to the proposed development and will be required in order to make the proposed developments acceptable in planning terms, all in accordance with the policy tests of Scottish Government Planning Circular 3/2012: Planning Obligations and Good Neighbour Agreements (Circular 3/2012) (CD@@).
- The Council does not agree with the requested modifications. However, to add further clarity to the supporting text and Policy, the Council would be supportive of the following modification:
- On page 30, Para 2, change text to read (revised text in italics):
  - ...This includes schools, early learning and childcare facilities; open spaces; *transportation* infrastructure and services (*including road, rail, bus, active travel etc.*); utilities; green network linkages...
- On Page 31 Strategic Policy 2 Para 4, change text to read (revised text in italics):
  - Where appropriate...Parks and Open Space; ~~Roads and Transportation infrastructure~~...

Homes for Scotland (476/7), Robertson Homes (495/3)

- The Council disagree that reference to healthcare should be removed from Strategic Policy 2.
- The Proposed Plan aims to ensure that health and well-being are recognised as a core component of the Development Strategy, and the Plan aims to create places that support healthy and active lives. Like other infrastructure provision, it is therefore essential that healthcare facilities have sufficient capacity to accommodate new developments. Scottish Planning Policy (SPP) (CD@@) and Circular 3/2012 make no distinction between who funds the required infrastructure and whether planning obligations can be sought towards it.
- A number of other local authorities (e.g. Moray, Aberdeen City, Aberdeenshire and Edinburgh City Councils, amongst others) have evidenced that additional healthcare infrastructure capacity is required as a direct result of new development, and have gone on to successfully secure development contributions to support the required capacity enhancements.
- Following receipt of comments from NHS Greater Glasgow and East Renfrewshire Health and Social Care Partnership (HSCP) the Council are committed to carrying out future analysis with our community planning partners to consider the capacity required to support future demand for healthcare infrastructure. It is felt necessary that Strategic Policy 2 is transparent and outlines the fact that this analysis is to be carried out. Only if increased capacity is required in certain areas would consideration be given to requesting contributions for this purpose. Any such addition would be reflected in an update to the Council's Development Contributions SPG, which would be subject to consultation and submission to Scottish Ministers.
- The Council also requires to give consideration to the letter from the Scottish Government's Cabinet Secretary for Health and Sport and Minister for Local Government, Housing and Planning (CD@@), sent to all local authority and health board chief executives in March 2019. This letter highlights existing and forthcoming duties for Planning Authorities and Health Boards in regard to development planning and its relationship to primary care, and the need to ensure that new development can be supported in locations or at times when the impact of the development on primary healthcare facilities can be managed. The annex to the letter highlights some practical examples from planning authorities to demonstrate the value of integrating primary care services to development planning e.g. giving the example of Moray Council's Proposed Plan which tabulates and maps primary care service needs arising from anticipated development and requires development proposals to provide for Education, Health, Transport, Sports and Recreation and Access facilities.
- It is not proposed to modify the Plan based upon the above.

Scottish Government (486/10)

- The focus of the Proposed Plan is regeneration and consolidation of our urban areas and enhancing existing places. As the Proposed Plan provides a generous housing land supply, no new additional housing sites have been identified for release. All identified development sites have therefore been brought forward from the Council's current adopted Local Development Plan (LDP1) (CD@@). The LDP1 master plan sites (e.g. M2, M2.1, M2.2 and M3 etc.) will play a significant role in achieving the objectives of both LDP1 and the Proposed Plan. As such the development contribution framework for each master plan area was developed and

agreed prior to the adoption of the master plans back in 2015. These contribution requirements have been reflected in individual planning applications coming forward and Section 75 legal agreements concluded and in place. Where master plan sites do not yet have planning permission, the development contribution framework has already been agreed with landowners / developers at pre-application stage.

- Outwith the master plan areas the Council's Development Contribution SPG sets out requirements and detailed discussions are encouraged at pre-application stage.
- It is therefore not felt necessary or appropriate to add this level of detail into the plan itself. Rather this information is available in the master plans and SPG or alongside the individual planning permissions and Section 75 legal agreements.
- The Council will however take these comments into account in the future where further land release is proposed.
- It is not proposed to modify the Plan based upon the above.

#### NHS Greater Glasgow (500/2)

- The Council notes the request for the creation of a specific policy context which requires developer contributions towards healthcare facilities, however the Council's position is that we cannot require development contributions towards healthcare facilities until there is a detailed evidence base and methodology in place to support this. Planning obligations can only be used in line with the legal tests set out in Circular 3/2012 which states that where a planning obligation is considered essential it must have a relevant planning purpose and must always be related and proportionate in scale and kind to the development in question.
- Further evidence needs to be gathered and analysis carried out to fully determine the impact that new development proposed within the Proposed Plan will have on existing healthcare facilities. The Council have committed to working with our community planning partners to carry out a capacity analysis and if required develop an appropriate contribution methodology in which to seek contributions towards relevant healthcare facilities. This is a complex piece of work which will require input from a number of community planning partners. Until such time as this work is complete it is not appropriate to add in a requirement for contributions or provide further reassurance within the policy.
- The advice that the current medical facilities will not provide the capacity required to meet the needs of residents in new developments is noted. As set out in the Policy, the Council have committed to working with community partners to carry out future analysis to consider the capacity required to support future demand for healthcare infrastructure.
- The Proposed Plan aims to ensure that health and well-being are recognised as a core component of the Development Strategy.
- It is not proposed to modify the Plan based upon the above.

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**

<b>Issue 4</b>	<b>City Deal</b>	
<b>Development plan reference:</b>	<b>Strategic Policy 3: City Deal</b>	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>James Whyteside (22/1)  GoBike (174/3)  Broom, Kirkhill and Mearnskirk Community Council (255/2) (255/3) (255/4) (255/5)  Thomas Cornwallis (471/2)  Visit Scotland (472/2)  Network Rail (475/3)  Scottish Government (486/1) (486/2)</p>		
<b>Provision of the development plan to which the issue relates:</b>	<p>Section 2: Managing and Enabling Growth  Delivery of City Deal Proposals  Strategic Policy 3: City Deal  Schedule 1: City Deal Proposals  Strat 3.1 Aurs Road  Strat 3.2 Lavern Valley Link road  Strat 3.3 Dams to Darnley Country Park – Visitor Centre  Strat 3.7 Barrhead South Train Station  Pages 32 to 34  Supporting documents:</p> <ul style="list-style-type: none"> <li>• Action Programme</li> </ul>	
<b>Planning authority's summary of the representation(s):</b>		
<p><b><u>(a) Strategic Policy 3: City Deal</u></b></p> <p><b><u>Support</u></b></p> <p><u>Broom, Kirkhill and Mearnskirk Community Council (255/2) (255/3) (255/4)</u></p> <ul style="list-style-type: none"> <li>• Support for the proposal for funding support under the City Deal and illustrated in Figure 7 on page 33 of LDP2.</li> <li>• Support proposals Strat 3.1: Aurs Road and Strat 3.2: Lavern Valley Link road.</li> </ul> <p><b><u>(b) Schedule 1 - Strat 3.3: Dams to Darnley Country Park – Proposed Visitor Centre</u></b></p> <p><b><u>Support</u></b></p> <p><u>Broom, Kirkhill and Mearnskirk Community Council (255/5)</u></p> <ul style="list-style-type: none"> <li>• Support Strat 3.3 Dams to Darnley Country Park – Proposed Visitor Centre.</li> </ul> <p><u>Visit Scotland (472/2)</u></p>		

- Welcome the proposal for a new visitor centre at the Dams to Darnley Country Park as a way to encourage new and repeat visits to the area.

### **Objections**

#### **James Whyteside (22/1)**

- Objects to visitor centre and associated cable wakeboarding facility. Participation in wake-boarding remains low and of limited interest to residents and non-residents. Both visitor centre & wakeboarding facilities are not needed and would also do harm to bio-diversity in the area.
- Project diverts funds from other subjects (roads, schools, care homes & inclusive sports).
- Contrary to LDP spatial objectives (1, 2 &3) and SEA objectives (9, 10, 12, D8.6 and D12.4).
- Interpretative panels would suffice, building facilities will lead to 'urban creep'.

### **(c) Schedule 1 - Strat 3.7: Barrhead South Train Station**

#### **Support**

#### **GoBike (174/3), Thomas Cornwallis (471/2)**

- Welcome the prospect of a new railway station at Barrhead South - walking and cycling routes to the station should be predominant over driving routes.

#### **Objections**

#### **Network Rail (475/3)**

- It is the experience of Network Rail that the effective planning and delivery of railway infrastructure rarely fits neatly into either a local or regional area scale. Improvements or enhancements to the rail network are most appropriately planned and delivered on a 'rail corridor' or route basis as changes to the rail infrastructure in one place may impact on the operation of the wider rail network and will often benefit places geographically remote from the physical location of the improved infrastructure. This should be borne in mind when identifying how the projects set out in Schedule 1, p34 can be implemented, particularly with reference to Strat 3.6 and 3.7.

#### **Scottish Government (486/1) (486/2)**

- SPP paragraph 277 states "The strategic case for a new station should emerge from a complete and robust multimodal transport appraisal in line with Scottish Transport Appraisal Guidance."
- Whilst it is understood that the Council are undertaking the Barrhead South Accessibility Appraisal in line with STAG, the outcomes however are not yet known, therefore, the plan should not pre-judge the outcomes.

### **Modifications sought by those submitting representations:**

**(b) Schedule 1 - Strat 3.3: Dams to Darnley Country Park – Proposed Visitor Centre**

James Whyteside (22/1)

- Removal of proposal Strat 3.3 Dams to Darnley Country Park – Proposed Visitor Centre from the Proposed Plan.

**(c) Schedule 1 - Strat 3.7: Barrhead South Train Station**

Scottish Government (486/1) (486/2)

- Strat 3.7 is recommended to detail the Barrhead South Accessibility Appraisal replacing the text on the Barrhead South train station. The above appraisal is being undertaken in line with STAG and will determine the optimum transport solutions to identified transport constraints in the area.
- Recommended the text on page 18 of the Action Programme is amended to reflect the Barrhead South Accessibility Appraisal and not a specific option being appraised. Recommended changes within Strat 3.7 in Schedule 1 include: Strat 3.7 is recommended to detail the Barrhead South Accessibility Appraisal replacing the text on the Barrhead South train station. This appraisal is being undertaken in line with STAG and will determine the optimum transport solutions to identified transport constraints in the area.

**Summary of responses (including reasons) by planning authority:****(a) Strategic Policy 3: City Deal****Support**

Broom, Kirkhill and Mearnskirik Community Council (255/2) (255/3) (255/4)

- The Council acknowledges and welcomes the support for Strategic Policy 3 and proposals Strat 3.1 and Strat 3.2.
- It is not proposed to modify the Plan based upon the above.

**(b) Schedule 1 - Strat 3.3: Dams to Darnley – Proposed Visitor Centre****Support**

Broom, Kirkhill and Mearnskirik Community Council (255/5), VisitScotland (472/2)

- The Council acknowledges and welcomes the support for proposal Strat 3.3.
- It is not proposed to modify the Plan based upon the above.

**Objections**

James Whyteside (22/1)

- The Council is aware of the sensitivity of the site and has taken a careful and considered approach to this proposal. The need for a visitor centre and wake

boarding has been established through appropriate stages of feasibility which are detailed in The Dams to Darnley Country Park Supplementary Planning Guidance (2015) (CD/@@). The SPG sets out the rationale and benefits of a Visitor Centre and wakeboarding facility and identifies a preferred option which has the least impact on landscape and biodiversity. The design brief is for an ecologically sensitive facility that blends into the rural setting. The impact of the visitor centre was assessed through the SEA (2015) (CD/@@) which accompanied the Dams to Darnley SPG, which remains relevant.

- It is not proposed to modify the Plan based upon the above.

### **(c) Schedule 1 - Strat 3.7: Barrhead South Train Station**

#### **Support**

GoBike (174/3), Thomas Cornwallis (471/2)

- The Council acknowledges and welcomes the support for Strat 3.7: Barrhead South Train Station.
- It is not proposed to modify the Plan based upon the above.

#### **Objections**

Network Rail (475/3), Scottish Government (486/1) (486/2)

- The Council is working closely with Transport Scotland, Network Rail and SPT to develop this proposal and ensure that no detrimental impacts on the wider network are created. This close working is being undertaken within and subject to the STAG appraisal process. Further representations on this matter from the Scottish Government and Network Rail are addressed under Issues 5 and 12. The Council is supportive of the suggested amendments to reflect the outcome of the Barrhead South Accessibility Appraisal and the STAG process.
- If the reporter is so minded to recommend that the representation from Scottish Government is accepted and the Plan modified, as set out below, the Council would be supportive of these modifications.

Page 34 Schedule 1 Strat 3.7, insert the following text (revised text in italics):

*A railway station, subject to the outcome of the appraisal being undertaken in line with STAG, and bus interchange.....*

- Modifications will also be made to the Action Programme to reflect the STAG process.

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**

<b>Issue 5</b>	<b>Areas for Change</b>	
<b>Development plan reference:</b>	Policy M1 – Master Plans Policy M2 – M77 Strategic Development Opportunity. Policy M2.1 M77 Strategic Development Opportunity- Maidenhill/ Malletsheugh, Newton Mearns. Policy M2.2 M77 Strategic Development Opportunity – Barrhead South-Springhill, Springfield, Lyoncross	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
Mr and Mrs Green (133/1) Broom, Kirkhill and Mearnskirk Community Council (255/6) (255/7) (255/8) Network Rail (475/2) Scottish Government (486/11) Tarmac (491/1)		
<b>Provision of the development plan to which the issue relates:</b>	Section 2: Managing and Enabling Growth Areas for Change- Spatial Delivery of Growth pages 35 to 41	
<b>Planning authority's summary of the representation(s):</b>		
<p><b><u>(a) Policy M1: Master Plans</u></b></p> <p><b><u>Support</u></b></p> <p><u>Broom, Kirkhill and Mearnskirk Community Council (255/6)</u></p> <ul style="list-style-type: none"> <li>• Support Policy M1: Master Plans.</li> </ul> <p><b><u>(b) Policy M2 – M77 Strategic Development Opportunity</u></b></p> <p><b><u>Support</u></b></p> <p><u>Broom, Kirkhill and Mearnskirk Community Council (255/7)</u></p> <ul style="list-style-type: none"> <li>• Support Policy M2: M7 Strategic Development Opportunity.</li> </ul> <p><b><u>Objections</u></b></p> <p><u>Tarmac (491/1)</u></p> <ul style="list-style-type: none"> <li>• Representee is seeking to extend the boundary of the Strategic Development Opportunity identified within Policy M2.</li> </ul>		



- Promoting sustainable use of the site as a facility to support the strategic transport network and future growth of the M77 Strategic Development Opportunity. Paragraph 5.20 of the SPP (2014) recognises that the strategic road network has “an essential role to play in connecting cities by car, public transport and active travel.” Furthermore, Scotland’s Infrastructure Investment Plan includes measures to improve the safety, capacity and performance of the strategic inter-city road network.
- Provision of a facility to support the inter-city M77 trunk road is considered to be compliant with the national infrastructure measures to improve Scotland’s strategic road network. The adopted LDP1 for East Renfrewshire recognises the importance of safeguarding existing transportation infrastructure. Policy SG10 makes specific reference to preservation of the Glasgow Southern Orbital and M77 transport corridors.

**(c) Policy M2.1: M77 Strategic Development Opportunity - Maidenhill/ Malletsheugh, Newton Mearns**

**Support**

Broom, Kirkhill and Mearns Kirk Community Council (255/8)

- Support Policy M2.1: M77 Strategic Development Opportunity – Maidenhill/ Malletsheugh, Newton Mearns.

**Objections**

Mr and Mrs Green (133/1)

- Object to designation of land to the north of Fa'Side House under Policy D5 Urban greenspace.
- Land should be re-designated as M2.1 and included within the Maidenhill masterplan area.

**(d) Policy M2.2: M77 Strategic Development Opportunity - Barrhead South - Springhill, Springfield, Lyoncross**

**Objections**

Network Rail (475/2)

- Network Rail welcomes the masterplan approach for the phasing and delivery of the planned growth areas within East Renfrewshire which will allow consideration and future planning of the proposed rail infrastructure and its impact on existing services.
- With specific reference to the proposed new railway station and bus interchange at Barrhead South (Strat 3.6) it is important that use is made of the STAG process to assess the impact a new station may have on the existing services, train stock, timetabling and platform capacity at Glasgow Central Station.

Scottish Government (486/11)

SPP paragraph 277 states “The strategic case for a new station should emerge from a complete and robust multimodal transport appraisal in line with Scottish Transport Appraisal Guidance.” An appraisal in line with STAG is required when seeking Government funding, support or approval for options to change the transport system.

#### **Modifications sought by those submitting representations:**

##### **(b) Policy M2 – M77 Strategic Development Opportunity**

Tarmac (491/1)

- Request the boundary of Policy M2 is extended to include their site.

##### **(c) Policy M2.1: M77 Strategic Development Opportunity - Maidenhill/ Malletsheugh, Newton Mearns**

Mr and Mrs Green (133/1)

- Removal of D5: Urban greenspace allocation and re-designate land within Policy M2.1 Maidenhill/ Malletsheugh masterplan area.

##### **(d) Policy M2.2: M77 Strategic Development Opportunity - Barrhead South - Springhill, Springfield, Lyoncross**

Network Rail (475/2)

- At point 2 of Policy M2.2 recommend the following revisions:  
2. Provision of a sustainable roads, access and transport strategy, including improved connections to surrounding road, foot and cycle path network and to the Dams to Darnley Country Park, public transport upgrades and roads and transportation improvements, including a railway station and bus interchange (Strat 3.6) and the Lavern Valley link road (Strat 3.2), *all to be subject to the STAG appraisal process*; and...

Scottish Government (486/11)

- At point 2 of Policy M2.2 recommend the following revisions:  
2. Provision of a sustainable roads, access and transport strategy, including improved connections to surrounding road, foot and cycle path network and to the Dams to Darnley Country Park, public transport upgrades and roads and transportation improvements, including *the potential for a railway station subject to the outcome of the appraisal being undertaken in line with STAG*, and bus interchange.....

#### **Summary of responses (including reasons) by planning authority:**

##### **(a) Policy M1: Master Plans**

##### **Support**

Broom, Kirkhill and Mearnskirk Community Council (255/6)

- The Council acknowledges and welcomes the support for Policy M1.
- It is not proposed to modify the Plan based upon the above.

**(b) Policy M2 – M77 Strategic Development Opportunity.**

**Support**

Broom, Kirkhill and Mearnskirk Community Council (255/7)

- The Council acknowledges and welcomes the support for Policy M2.
- It is not proposed to modify the Plan based upon the above.

**Objections**

Tarmac (491/1)

- Reference within the representation is made to Scottish Planning Policy (SPP) (CD/@@) with quotation “essential role in connecting cities.....” This quotation is misplaced, and is actually taken from paragraph 5.20 of the National Planning Framework (NPF3) (CD/@@). No such reference is contained within SPP.
- The suite of national projects contained within NPF3 including strategic transport projects are enabled through the associated ‘Infrastructure Investment Plan and Annex A-National Developments’.
- For information neither the ‘NPF3’ or the associated ‘Infrastructure Investment Plan’ and subsequent annual updates on progress, include M77/GSO corridor. The location is not a National Development project and therefore reference to the associated text is misleading.
- None of (NPF3 and IIP) projects are relevant to or support the extension to M77-SDO, and neither the SPP or NPF3 and associated Investment plan (2015) and subsequent Progress Reports can be construed to promote or advocate any further extension to the M77 master plan area.
- It is acknowledged that the adopted LDP1 (CD/@@), through Policy SG10, recognises amongst other items, the importance of the Glasgow Southern Orbital and M77 route, through safeguarding the existing transport infrastructure from development that could prejudice its ability to function. Schedule 17 of the adopted LDP lists a range of projects, including (SG10.10- M77/GSO, Newton Mearns. (Potential for MSA). This possibility, at that time, for potential MSA, has been superseded by events and is no longer an active project. The adopted LDP does not in any way advocate or promote any further development proposals in the vicinity, excepting the potential MSA referenced above. No further development/expansion in addition to the M77 masterplan is advocated.
- Additionally it could be considered that any further development proposals at this location, which are not adequately justified, may in themselves prejudice (M77/GSO) ability to function efficiently.
- It is not proposed to modify the plan based upon the above.

**(c) Policy M2.1: M77 Strategic Development Opportunity - Maidenhill/ Malletsheugh, Newton Mearns**

**Support**

Broom, Kirkhill and Mearnskirk Community Council (255/8)

- The Council acknowledges and welcomes the support for Policy M2.1.
- It is not proposed to modify the Plan based upon the above.

**Objections**Mr and Mrs Green (133/1)

- Whilst the site in question is within the overall Policy M2.1 designation, it has consistently never been an area where development has been promoted. Within the masterplan the sites' existing attributes have been recognised as features out with the detailed landscape framework, with rocky outcrops and slopes, especially from lodge up the access road to the Faside House (B- listed building). These landscape features are recognised as important entranceways.
- The prominence and importance of the setting of Faside House a listed building (B) is recognised as a valuable feature to maintain. The 'protected greenspace' serves to maintain the open character and entranceway to the listed building. This in effect retains and enhances the approach to the listed building, as has been the case since its erection in the late 18th century. The open field to the north of Faside house also contains Faside Lodge at the entranceway and Faside House is accessed up a tree lined sloping access road to Faside House and is an important feature of the setting of the listed building.
- The masterplan aimed to utilise the features, landscape characteristics and attributes. In this instance the 'greenspace designation' helps to ensure that the open sloping field and entranceway up to the listed building is maintained as a feature. There are numerous examples of greenspace designations within successive major development release sites over successive development plans (e.g. Greenlaw and Westacres). Given all these features it is entirely fitting for the Policy D5 designation to be maintained as it serves a useful purpose.
- A change in designation from Policy D5 within the overall masterplan policy M2.1 is considered inappropriate.
- It is not proposed to modify the plan based upon the above.

**(d) Policy M2.2: M77 Strategic Development Opportunity - Barrhead South - Springhill, Springfield, Lyoncross****Objections**Network Rail (475/2), Scottish Government (486/11)

- The Council acknowledge the support from Network Rail (475/2) for the master planned approach and the specific reference to point 2 within the policy in relation to the proposed new railway station and bus interchange at Barrhead South (Strat3.6).
- The Council is working closely with Transport Scotland, Network Rail and SPT to develop this proposal and ensure that no detrimental impacts on the wider network are created. This close working is being undertaken within and subject to the STAG appraisal process.
- It is acknowledged and accepted that, as per SPP (para 277) the STAG process is required when seeking Government funding support or approval for options to

change the Transport system. Network Rail and Transport Scotland have both requested the inclusion of text relating to the STAG process.

- The Council agrees with the inclusion of additional reference to STAG process within Criterion 2 of the policy.
- If the Reporter is so minded to recommend that the representation from Scottish Government is accepted and the Plan modified, as set out below, the Council would be supportive of this modification because it would accord with SPP, strengthen the policy and show that the STAG's role in the process is explicit. This modification would also address the points raised by Network Rail. Further representations on this matter from the Scottish Government and Network Rail are addressed under Issues 4 and 12.
- Policy M2.2 Criterion 2 should be amended to read (revised text in italics):  
Provision of a sustainable roads, access and transport strategy, including improved connections to surrounding road, foot and cycle path network and to the Dams to Darnley Country Park, public transport upgrades and roads and transportation improvements, including *the potential for a railway station subject to the outcome of the appraisal being undertaken in line with STAG*, and bus interchange.....

**Reporter's conclusions:**

**Reporter's recommendations:**

<b>Issue 6</b>	<b>Braidbar Quarry, Giffnock</b>	
<b>Development plan reference:</b>	Policy M4: Master Plan Braidbar Quarry	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Sport Scotland (7/10)  Lorna Alexander (13/1)  William Bailey (15/1)  Lynsey Craig (16/1)  Bob Bryce (17/1)  Neil Watson (19/1)  Alicia Whyte (20/1)  Lyndsay MacLeod (21/1)  Anne Philips (24/1)  Elaine Grimes (25/1)  Mark Heron (26/1)  Callum Johnson (27/1)  Ross Burns (28/1)  Diane Campbell (29/1)  Martin Campbell (30/1)  Joanna Leslie (31/1)  Vicky Lafferty (32/1)  Lindsey Coyne (33/1)  Louise Chalmers (34/1)  Anna Curley (35/1)  Mary Walker (36/1)  Gail Duff (37/1)  Patrick Ruddy (38/1)  Alison Ruddy (40/1)  Thomas Fay (41/1)  Peter Wiggins (42/1)  Paul Verrico (43/1)  Andrew Jarvis (44/1)  Thomas McGuire (45/1)  Lesley MacKay (46/1)  William Welsh (47/1)  Catherine A. S. Welsh (48/1)  Sharon De Sykes (49/1)  Norma Morrison (50/1)  Dan Greenberg (51/1)  Alastair Kelly (52/1)  Colin McMahon (53/1)  Joan Bryans (54/1)  Alex Mackie (55/1) (55/2)  Gillian Gordon (57/1)  Bernard Conway (58/1)  Janet Boe (61/1)  Byron Myrden (62/1)</p>		

Emma Ritchie (63/1)  
Laura Harrison (64/1)  
S McGeady (66/1)  
Gerry Coyle (67/1)  
Alan Ferguson (68/1)  
Elizabeth Roberta Ferguson (69/1)  
Frank Kaye (70/1)  
Gordon Connell (71/1)  
Francis Burns (72/1)  
William Wallace (74/1)  
Lesley MacDonald (75/1)  
Nancy Dear (76/1)  
Caroline Wilkinson (77/1)  
Pamela Campbell (78/1)  
Michael Watt (79/1)  
James Scott (80/1)  
Andrew Wodehouse & Lorna Campbell (81/1)  
Gavin Dickson (82/1)  
Catherine Drew (83/1)  
Jean M Rankin (84/1)  
Mr & Mrs W Arnott (85/1)  
Douglas Harvie (86/1)  
Alastair I. Grant (87/1)  
James H Kennedy & Hilary L Kennedy (88/1)  
Pearl du Feu (89/1)  
Janet Reid (90/1)  
Thomas Birkett (91/1)  
G W Montieth (92/1)  
Monica Finnegan (93/1)  
B S Laidlaw (94/1)  
K Monteith (95/1)  
Anne Howard (96/1)  
Tom Carlin & Lucy Macintyre (97/1)  
P E McKinlay (98/1)  
Jean MacMillan (99/1)  
Mrs H G Payne (100/1)  
Peter Cupples (101/1)  
David Boyes (102/1)  
Elaine Boyes (103/1)  
Alicia Whyte (104/1)  
Morris Van Looy 106/1  
Connie Shields (107/1)  
Gordon Ingram (108/1)  
Martina Ingram (109/1)  
Gerard Fay (110/1)  
Kim Russell (111/1)  
Hilary Millar (112/1)  
Mrs Virginia A. Thomson (115/1)  
Alison Grossart (116/1)  
Jill Griffiths (119/1)  
Amy Edmunds (123/1)  
Robert Taylor (124/1)

Margaret Rae (125/1)  
Anne B Morrison (128/1)  
Giffnock Community Council (131/1) (131/2)  
The Hutchesons (138/1)  
James Walker (139/1)  
W A Philips (141/1)  
Allan & Ayako Fanning (142/1)  
Veronica Sutherland (143/1)  
Mrs Elizabeth Logue (144/1)  
Kenneth & Leonie Cook (145/1)  
Mrs Eunice A. Johnston (146/1)  
James Clokey (148/1)  
Shirley Tritschler (149/1)  
Allan G Steele (150/1)  
Mrs J G Birnie (151/1)  
David Christie (152/1)  
John Connor (154/1)  
Mrs Christine Sharp (155/1)  
Mrs Norma Lynch (156/1)  
Ann Elder (157/1)  
Susan Zeitlin (158/1)  
John Sharp (159/1)  
Christine Sharp (160/1)  
Ivor Britton & Carole Britton (161/1)  
Elaine Tarves (162/1)  
Jane R. Zeitlin (163/1)  
Jackie McGuigan (166/1)  
Patricia Sampaio (167/1)  
Lyndsey Greenshields (168/1)  
Adam Dawson (169/1)  
East Renfrewshire Council Education Department (170/3)  
Jane Floyd (173/1) (173/2)  
Marion Biggin (175/1)  
Rena J Findlay (176/1)  
I J Zeitlin (179/1)  
Harriet Hannah (180/1)  
Rosalind Jamieson (181/1)  
Malcolm McPherson (182/1)  
Margaret A. Robb (183/1)  
J Ian Mundell (184/1)  
Iain McCrimmon (185/1)  
James K. Tarves (186/1)  
J Treagold (187/1)  
Eric M. Elder (189/1)  
Niall McTeague (190/1)  
Gaynor J Paul (191/1)  
Fiona McTeague (192/1)  
R W Scott (194/1)  
Charles Allen (196/1)  
Tom Mathews (197/1)  
Nancy Mathews (198/1)  
Alastair Greenshields (199/1)



Jennifer Greenshields (200/1)  
J. Campbell (201/1)  
Elaine Brown (204/1)  
Elspeth Summers (205/1)  
Lauren Jarvis (206/1)  
George Duncan (209/1)  
Laura Chalmers (211/1)  
David Chalmers (212/1)  
Martine Macdonald (213/1)  
Nicola Gallen (214/1)  
Garry Crosbie (215/1)  
Callum McCosh (216/1)  
Paolo Andreuccetti (217/1)  
Nicola Littlewood (219/1)  
Janis Thomson (220/1)  
Ross MacArthur (222/1)  
Jack Connor (223/1)  
James Platt (224/1)  
Robert Marshall (225/1)  
Anne Marshall (226/1)  
Tom Cloke (227/1)  
Lucille MacKinnon (228/1)  
Jeanette Whiteside (229/1)  
Leslie B Gardner (230/1)  
Mairi Donald (231/1)  
Gillian Esposito (232/1)  
Peter McGlynn (233/1)  
Michael Shiel (236/1)  
Neal Peggs (237/1)  
David Henderson (238/1)  
John Holmes (239/1)  
Sandra Platt (240/1)  
Richard Park (241/1)  
Margaret McKnight (242/1)  
Maureen Park (243/1)  
Robin Mair (244/1)  
Dr Ronald MacLean (246/1)  
Jim Kerr (248/1)  
Marianne Mair (249/1)  
Darren Macdonald (251/1)  
Marlies MacLean (252/1)  
David Stevenson (253/1)  
Thomas Anderson Whiteside (254/1)  
Graham Picken (256/1)  
Douglas Hegney (257/1)  
Jean Hegney (258/1)  
Marilyn Keegan (260/1)  
Agapitos Patakas (262/1)  
Susan Grant (263/1) (263/2)  
Yi Huei Tsai (264/1)  
Roseanne Henderson (265/1)  
Fiona Harkess (266/1)

Marilyn Keegan (267/1)  
Mark Robertson (268/1)  
Ian Crowther (270/1)  
Gordon Wilton (272/1)  
Sharon Shiel (275/1)  
Alison Lee (278/1)  
Keith Dale (280/1)  
Lucy Dornan (284/1)  
Morag Peggs (286/1)  
Stephen Doherty (308/1)  
Dr Paul Deehan (311/1)  
Mary Kerr (336/1)  
Ruth Levey (337/1)  
Elizabeth Somerville (354/1)  
Philippa Mayes (355/1)  
Agnes Jamieson (360/1)  
Keir Jamieson (362/1)  
Catherine Somerville (371/1)  
Andrew & Marie Carey (375/1)  
Colin MacCallum (377/1)  
Dr Colin M Tait (381/1)  
Mrs Elizabeth Tait (383/1)  
Laura Wiggins (385/1)  
Sheila Watson (386/1)  
James Bone (388/1)  
Richard Wallis (389/1)  
Raffaele Esposito (390/1)  
John Charles (391/1)  
James Ian Mundell (392/1)  
Brian Letham (393/1)  
Katie McGuire (395/1)  
Alex O'Hara (398/1)  
W Pollock (399/1)  
Clare Pollock (401/1)  
Raymond Sweeney (403/1)  
Robert Squair (404/1)  
Susan Brydie (405/1)  
William Martin (406/1)  
Mairead Fernandez McCann (407/1) (407/2)  
Wendy Wallis (410/1)  
W. P. Edmondson (413/1)  
Fabizio Ventisei (414/1)  
Scott & Emma Yuill (416/1)  
Margaret C. Cameron (417/1)  
Sandra Paterson (418/1)  
John W. Clingan (419/1)  
Lynn Bale (420/1)  
A E. Lancaster (422/1)  
Alastair Bale (423/1)  
Andrew Yates (425/1)  
Jean Taylor (427/1)  
Jackson Carlaw MSP (428/1)

<p>Sylvia M. Gordon (429/1)  Andrew &amp; Rita Keane (430/1)  Nick Treadgold (431/1)  Robert Harrison (432/1)  Mrs Joan Marion Adams (433/1)  A Hunter (434/1)  C Barr (435/1)  Allan &amp; Irene McNeilage (436/1)  Graham D Paul (438/1)  Brendan Harris (439/1)  Laura &amp; Alice van den Akker (440/1)  Patricia Riddell (441/1)  Patricia M. Doran (443/1)  Paul Drury (444/1)  Moirra Harris (445/1)  Scot &amp; Elaine van den Akker (446/1)  Friends of Huntly Park (448/1)  Iain Biggin (449/1)  F Greene (455/1)  Dr Paul Greig (456/1)  Mary MacCallum (468/1)  Andrew Morley (469/1)  Heather Hughes (479/1)  Shirley Wallace (481/1)  G Muir (483/1)</p>	
<p><b>Provision of the development plan to which the issue relates:</b></p>	<p>Section 2 Managing and Enabling Growth  Policy D4: Green Network  Policy D5 Protection of Urban Greenspace  Braidbar Quarry  Proposal D7.3 Local Biodiversity Sites Giffnock Scrub  Proposal D8.1: Core Paths  Proposal D12.6: Huntly Park, Giffnock: Improvement of football facilities and new build pavilion – linked with longer term proposals at Braidbar Quarry (M4)  Supporting Documents:</p> <ul style="list-style-type: none"> <li>• Site Evaluation</li> <li>• Strategic Environmental Assessment</li> </ul>
<p><b>Planning authority's summary of the representation(s):</b></p>	
<p><b><u>Support</u></b></p> <p><u>Sport Scotland (7/10)</u></p> <ul style="list-style-type: none"> <li>• LDP2 should exclude Huntly playing fields from the M4 area.</li> <li>• Highlights that LDP2 proposes protection of Huntly playing fields under D13.</li> <li>• Highlights that SPP para 226 would apply to the protection of Huntly Playing fields.</li> </ul> <p><u>William Wallace (74/1)</u></p>	

- Supports remediation & building to finance remediation.
- Site is a known inherent danger which needs remediated.
- This will require extensive monies which the council cannot finance.
- Huntly Park (top playing field) should be retained and not used for building purposes (gifted to people). However the (bottom playing field), Braidbar Park, maybe be treated separately.

Allan G Steele (150/1)

- Supports housing on the site if this stabilises the quarry.
- Suggests that Huntly Park should be excluded from Housing area, with focus on Quarry site.

East Renfrewshire Council Education Department (170/3)

- Requirement for education solution if development detailed in Policy M4 Braidbar is brought forward.

**Objections**

**Full list of representations set out in Appendix 1 with summarised key points set out below.**

Lorna Alexander (13/1), William Bailey (15/1), Lynsey Craig (16/1), Bob Bryce (17/1), Neil Watson (19/1), Alicia Whyte (20/1), Lyndsay MacLeod (21/1), Anne Philips (24/1), Elaine Grimes (25/1), Mark Heron (26/1), Callum Johnson (27/1), Ross Burns (28/1), Diane Campbell (29/1), Martin Campbell (30/1), Joanna Leslie (31/1), Vicky Lafferty (32/1), Lindsey Coyne (33/1), Louise Chalmers (34/1), Anna Curley (35/1), Mary Walker (36/1), Gail Duff (37/1), Patrick Ruddy (38/1), Alison Ruddy (40/1), Thomas Fay (41/1), Peter Wiggins (42/1), Paul Verrico (43/1), Andrew Jarvis (44/1), Thomas McGuire (45/1), Lesley MacKay (46/1), William Welsh (47/1), Catherine A. S. Welsh (48/1), Sharon De Sykes (49/1), Norma Morrison (50/1), Dan Greenberg (51/1), Alastair Kelly (52/1), Colin McMahon (53/1), Joan Bryans (54/1), Alex Mackie (55/1), Gillian Gordon (57/1), Bernard Conway (58/1), Janet Boe (61/1), Byron Myrden (62/1), Emma Ritchie (63/1), Laura Harrison (64/1), S McGeady (66/1), Gerry Coyle (67/1), Alan Ferguson (68/1), Elizabeth Roberta Ferguson (69/1), Frank Kaye (70/1), Gordon Connell (71/1), Francis Burns (72/1), Lesley MacDonald (75/1), Nancy Dear (76/1), Caroline Wilkinson (77/1), Pamela Campbell (78/1), Michael Watt (79/1), James Scott (80/1), Andrew Wodehouse & Lorna Campbell (81/1), Gavin Dickson (82/1), Catherine Drew (83/1), Jean M Rankin (84/1), Mr & Mrs W Arnott (85/1), Douglas Harvie (86/1), Alastair I. Grant (87/1), James H Kennedy & Hilary L Kennedy (88/1), Pearl du Feu (89/1), Janet Reid (90/1), Thomas Birkett (91/1), G W Montieth (92/1), Monica Finnegan (93/1), B S Laidlaw (94/1), K Monteith (95/1), Anne Howard (96/1), Tom Carlin & Lucy Macintyre (97/1), P E McKinlay (98/1), Jean MacMillan (99/1), Mrs H G Payne (100/1), Peter Cupples (101/1), David Boyes (102/1), Elaine Boyes (103/1), Alicia Whyte (104/1), Morris Van Looy (106/1), Connie Shields (107/1), Gordon Ingram (108/1), Martina Ingram (109/1), Gerard Fay (110/1), Kim Russell (111/1), Hilary Millar (112/1), Mrs Virginia A. Thomson (115/1), Alison Grossart (116/1), Jill Griffiths (119/1), Amy Edmunds (123/1), Robert Taylor (124/1), Margaret Rae (125/1), Anne B Morrison (128/1), Giffnock Community Council (131/1), The Hutchesons (138/1), James Walker (139/1), W A Philips (141/1), Allan & Ayako Fanning (142/1), Veronica Sutherland (143/1), Mrs Elizabeth Logue (144/1), Kenneth & Leonie Cook (145/1), Mrs Eunice A. Johnston (146/1), James Clokey (148/1), Shirley Tritchler (149/1), Mrs J G Birnie

(151/1), David Christie (152/1), John Connor (154/1), Mrs Christine Sharp (155/1), Mrs Norma Lynch (156/1), Ann Elder (157/1), Susan Zeitlin (158/1), John Sharp (159/1), Christine Sharp (160/1), Ivor Britton & Carole Britton (161/1), Elaine Tarves (162/1), Jane R. Zeitlin (163/1), Jackie McGuigan (166/1), Patricia Sampaio (167/1), Lyndsey Greenshields (168/1), Adam Dawson (169/1), Jane Floyd (173/1), Marion Biggin (175/1), Rena J Findlay (176/1), I J Zeitlin (179/1), Harriet Hannah (180/1), Rosalind Jamieson (181/1), Malcolm McPherson (182/1), Margaret A. Robb (183/1), J Ian Mundell (184/1), Iain McCrimmon (185/1), James K. Tarves (186/1), J Treagold (187/1), Eric M. Elder (189/1), Niall McTeague (190/1), Gaynor J Paul (191/1), Fiona McTeague (192/1), R W Scott (194/1), Charles Allen (196/1), Tom Mathews (197/1), Nancy Mathews (198/1), Alastair Greenshields (199/1), Jennifer Greenshields (200/1), J. Campbell (201/1), Elaine Brown (204/1), Elspeth Summers (205/1), Lauren Jarvis (206/1), George Duncan (209/1), Laura Chalmers (211/1), David Chalmers (212/1), Martine Macdonald (213/1), Nicola Gallen (214/1), Garry Crosbie (215/1), Callum McCosh (216/1), Paolo Andreuccetti (217/1), Nicola Littlewood (219/1), Janis Thomson (220/1), Ross MacArthur (222/1), Jack Connor (223/1), James Platt (224/1), Robert Marshall (225/1), Anne Marshall (226/1), Tom Cloke (227/1), Lucille MacKinnon (228/1), Jeanette Whiteside (229/1), Leslie B Gardner (230/1), Mairi Donald (231/1), Gillian Esposito (232/1), Peter McGlynn (233/1), Michael Shiel (236/1), Neal Peggs (237/1), David Henderson (238/1), John Holmes (239/1), Sandra Platt (240/1), Richard Park (241/1), Margaret McKnight (242/1), Maureen Park (243/1), Robin Mair (244/1), Dr Ronald MacLean (246/1), Jim Kerr (248/1), Marianne Mair (249/1), Darren Macdonald (251/1), Marlies MacLean (252/1), David Stevenson (253/1), Thomas Anderson Whiteside (254/1), Graham Picken (256/1), Douglas Hegney (257/1), Jean Hegney (258/1), Marilyn Keegan (260/1), Agapitos Patakas (262/1), Susan Grant (263/1), Yi Huei Tsai (264/1), Roseanne Henderson (265/1), Fiona Harkess (266/1), Marilyn Keegan (267/1), Mark Robertson (268/1), Ian Crowther (270/1), Gordon Wilton (272/1), Sharon Shiel (275/1), Alison Lee (278/1), Keith Dale (280/1), Lucy Dornan (284/1), Morag Peggs (286/1), Stephen Doherty (308/1), Dr Paul Deehan (311/1), Mary Kerr (336/1), Ruth Levey (337/1), Elizabeth Somerville (354/1), Philippa Mayes (355/1), Agnes Jamieson (360/1), Keir Jamieson (362/1), Catherine Somerville (371/1), Andrew & Marie Carey (375/1), Colin MacCallum (377/1), Dr Colin M Tait (381/1), Mrs Elizabeth Tait (383/1), Laura Wiggins (385/1), Sheila Watson (386/1), James Bone (388/1), Richard Wallis (389/1), Raffaele Esposito (390/1), John Charles (391/1), James Ian Mundell (392/1), Brian Letham (393/1), Katie McGuire (395/1), Alex O'Hara (398/1), W Pollock (399/1), Clare Pollock (401/1), Raymond Sweeney (403/1), Robert Squair (404/1), Susan Brydie (405/1), William Martin (406/1), Mairead Fernandez McCann (407/1), Wendy Wallis (410/1), W. P. Edmondson (413/1), Fabrizio Ventisei (414/1), Scott & Emma Yuill (416/1), Margaret C. Cameron (417/1), Sandra Paterson (418/1), John W. Clingan (419/1), Lynn Bale (420/1), A E. Lancaster (422/1), Alastair Bale (423/1), Andrew Yates (425/1), Jean Taylor (427/1), Jackson Carlaw MSP (428/1), Sylvia M. Gordon (429/1), Andrew & Rita Keane (430/1), Nick Treadgold (431/1), Robert Harrison (432/1), Mrs Joan Marion Adams (433/1), A Hunter (434/1), C Barr (435/1), Allan & Irene McNeilage (436/1), Graham D Paul (438/1), Brendan Harris (439/1), Laura & Alice van den Akker (440/1), Patricia Riddell (441/1), Patricia M. Doran (443/1), Paul Drury (444/1), Moira Harris (445/1), Scot & Elaine van den Akker (446/1), Friends of Huntly Park (448/1), Iain Biggin (449/1), F Greene (455/1), Dr Paul Greig (456/1), Mary MacCallum (468/1), Andrew Morley (469/1), Heather Hughes (479/1), Shirley Wallace (481/1), G Muir (483/1)

- Support for retaining the site as protected greenspace under Policy D5
- Support for designation as Local Biodiversity Sites under D7.3

- Loss and damage to biodiversity
- Loss of green space/ open space
- Huntly Park Playing fields should be excluded from Housing area
- Negative impact on health and wellbeing of local residents
- Levels of construction traffic would be unacceptable on suburban streets
- Risks of release of contaminated materials during remediation/construction
- Construction/remediation work would create unacceptable noise
- Remediation work likely to take years with ensuing years of disruption
- Development will increase CO2 emissions
- Completed development would increase traffic congestion on local roads
- Air quality would suffer from increased traffic on local roads
- Increased population would put pressure on school rolls
- Increased population would put pressure on local medical facilities
- Increased population would put pressure on local transport facilities
- There is sufficient housing land supply therefore no requirement for 400 houses in this area
- Development on M4 site was rejected by DPEA Reporter in 2011
- Loss of Public Right of Way
- Loss of cycling/walking routes
- Loss of sports pitches and facilities
- Loss of outlook and visual amenity
- LDP2 is not clear on what is protected by overlapping designations within the M4 boundary

### **Site Evaluation and Strategic Environmental Assessment**

#### Alex Mackie (55/2)

- Development in quarry area is bound to destroy habitat and be detrimental to the environment.

#### Jane Floyd (173/2)

- Affects upon the environment are unknown.

#### Susan Grant (263/2)

- Object to Advanced Construction facilitating a large housing development on Braidbar Quarry as set out in the table on page 34 of the Site Evaluation Document (SMIR04) and would support this being taken out.

#### Giffnock Community Council (131/2)

- Objects to the associated CS014 Braidpark Drive development listed in Site Evaluation, which is linked to policy M4.

#### Mairead Fernandez McCann (407/2)

- Quotes Para 5.2.2 of SEA. Some specific consequences would include the following: The loss of the greenspace resource (both urban greenspace and

green belt) to inappropriate development; Unplanned development could lead to the physical and visual coalescence of settlements.

**Modifications sought by those submitting representations:**

**(a) Policy M4: Master Plan Braidbar Quarry**

Sport Scotland (7/10), Lorna Alexander (13/1), William Bailey (15/1), Lynsey Craig (16/1), Bob Bryce (17/1), Neil Watson (19/1), Alicia Whyte (20/1), Lyndsay MacLeod (21/1), Anne Philips (24/1), Elaine Grimes (25/1), Mark Heron (26/1), Callum Johnson (27/1), Ross Burns (28/1), Diane Campbell (29/1), Martin Campbell (30/1), Joanna Leslie (31/1), Vicky Lafferty (32/1), Lindsey Coyne (33/1), Louise Chalmers (34/1), Anna Curley (35/1), Mary Walker (36/1), Gail Duff (37/1), Patrick Ruddy (38/1), Alison Ruddy (40/1), Thomas Fay (41/1), Peter Wiggins (42/1), Paul Verrico (43/1), Andrew Jarvis (44/1), Thomas McGuire (45/1), Lesley MacKay (46/1), William Welsh (47/1), Catherine A. S. Welsh (48/1), Sharon De Sykes (49/1), Norma Morrison (50/1), Dan Greenberg (51/1), Alastair Kelly (52/1), Colin McMahon (53/1), Joan Bryans (54/1), Alex Mackie (55/1), Gillian Gordon (57/1), Bernard Conway (58/1), Janet Boe (61/1), Byron Myrden (62/1), Emma Ritchie (63/1), Laura Harrison (64/1), S McGeady (66/1), Gerry Coyle (67/1), Alan Ferguson (68/1), Elizabeth Roberta Ferguson (69/1), Frank Kaye (70/1), Gordon Connell (71/1), Francis Burns (72/1), William Wallace (74/1), Lesley MacDonald (75/1), Nancy Dear (76/1), Caroline Wilkinson (77/1), Pamela Campbell (78/1), Michael Watt (79/1), James Scott (80/1), Andrew Wodehouse & Lorna Campbell (81/1), Gavin Dickson (82/1), Catherine Drew (83/1), Jean M Rankin (84/1), Mr & Mrs W Arnott (85/1), Douglas Harvie (86/1), Alastair I. Grant (87/1), James H Kennedy & Hilary L Kennedy (88/1), Pearl du Feu (89/1), Janet Reid (90/1), Thomas Birkett (91/1), G W Montieth (92/1), Monica Finnegan (93/1), B S Laidlaw (94/1), K Monteith (95/1), Anne Howard (96/1), Tom Carlin & Lucy Macintyre (97/1), P E McKinlay (98/1), Jean MacMillan (99/1), Mrs H G Payne (100/1), Peter Cupples (101/1), David Boyes (102/1), Elaine Boyes (103/1), Alicia Whyte (104/1), Morris Van Looy (106/1), Connie Shields (107/1), Gordon Ingram (108/1), Martina Ingram (109/1), Gerard Fay (110/1), Kim Russell (111/1), Hilary Millar (112/1), Mrs Virginia A. Thomson (115/1), Alison Grossart (116/1), Jill Griffiths (119/1), Amy Edmunds (123/1), Robert Taylor (124/1), Margaret Rae (125/1), Anne B Morrison (128/1), Giffnock Community Council (131/1), The Hutchesons (138/1), James Walker (139/1), W A Philips (141/1), Allan & Ayako Fanning (142/1), Veronica Sutherland (143/1), Mrs Elizabeth Logue (144/1), Kenneth & Leonie Cook (145/1), Mrs Eunice A. Johnston (146/1), James Clokey (148/1), Shirley Tritschler (149/1), Allan G Steele (150/1), Mrs J G Birnie (151/1), David Christie (152/1), John Connor (154/1), Mrs Christine Sharp (155/1), Mrs Norma Lynch (156/1), Ann Elder (157/1), Susan Zeitlin (158/1), John Sharp (159/1), Christine Sharp (160/1), Ivor Britton & Carole Britton (161/1), Elaine Tarves (162/1), Jane R. Zeitlin (163/1), Jackie McGuigan (166/1), Patricia Sampaio (167/1), Lyndsey Greenshields (168/1), Adam Dawson (169/1), Jane Floyd (173/1), Marion Biggin (175/1), Rena J Findlay (176/1), I J Zeitlin (179/1), Harriet Hannah (180/1), Rosalind Jamieson (181/1), Malcolm McPherson (182/1), Margaret A. Robb (183/1), J Ian Mundell (184/1), Iain McCrimmon (185/1), James K. Tarves (186/1), J Treagold (187/1), Eric M. Elder (189/1), Niall McTeague (190/1), Gaynor J Paul (191/1), Fiona McTeague (192/1), R W Scott (194/1), Charles Allen (196/1), Tom Mathews (197/1), Nancy Mathews (198/1), Alastair Greenshields (199/1), Jennifer Greenshields (200/1), J. Campbell (201/1), Elaine Brown (204/1), Elspeth Summers (205/1), Lauren Jarvis (206/1), George Duncan (209/1), Laura Chalmers (211/1), David Chalmers (212/1), Martine Macdonald (213/1), Nicola Gallen (214/1), Garry Crosbie (215/1), Callum

McCosh (216/1), Paolo Andreuccetti (217/1), Nicola Littlewood (219/1), Janis Thomson (220/1), Ross MacArthur (222/1), Jack Connor (223/1), James Platt (224/1), Robert Marshall (225/1), Anne Marshall (226/1), Tom Cloke (227/1), Lucille MacKinnon (228/1), Jeanette Whiteside (229/1), Leslie B Gardner (230/1), Mairi Donald (231/1), Gillian Esposito (232/1), Peter McGlynn (233/1), Michael Shiel (236/1), Neal Peggs (237/1), David Henderson (238/1), John Holmes (239/1), Sandra Platt (240/1), Richard Park (241/1), Margaret McKnight (242/1), Maureen Park (243/1), Robin Mair (244/1), Dr Ronald MacLean (246/1), Jim Kerr (248/1), Marianne Mair (249/1), Darren Macdonald (251/1), Marlies MacLean (252/1), David Stevenson (253/1), Thomas Anderson Whiteside (254/1), Graham Picken (256/1), Douglas Hegney (257/1), Jean Hegney (258/1), Marilyn Keegan (260/1), Agapitos Patakas (262/1), Susan Grant (263/1), Yi Huei Tsai (264/1), Roseanne Henderson (265/1), Fiona Harkess (266/1), Marilyn Keegan (267/1), Mark Robertson (268/1), Ian Crowther (270/1), Gordon Wilton (272/1), Sharon Shiel (275/1), Alison Lee (278/1), Keith Dale (280/1), Lucy Dornan (284/1), Morag Peggs (286/1), Stephen Doherty (308/1), Dr Paul Deehan (311/1), Mary Kerr (336/1), Ruth Levey (337/1), Elizabeth Somerville (354/1), Philippa Mayes (355/1), Agnes Jamieson (360/1), Keir Jamieson (362/1), Catherine Somerville (371/1), Andrew & Marie Carey (375/1), Colin MacCallum (377/1), Dr Colin M Tait (381/1), Mrs Elizabeth Tait (383/1), Laura Wiggins (385/1), Sheila Watson (386/1), James Bone (388/1), Richard Wallis (389/1), Raffaele Esposito (390/1), John Charles (391/1), James Ian Mundell (392/1), Brian Letham (393/1), Katie McGuire (395/1), Alex O'Hara (398/1), W Pollock (399/1), Clare Pollock (401/1), Raymond Sweeney (403/1), Robert Squair (404/1), Susan Brydie (405/1), William Martin (406/1), Mairead Fernandez McCann (407/1), Wendy Wallis (410/1), W. P. Edmondson (413/1), Fabrizio Ventisei (414/1), Scott & Emma Yuill (416/1), Margaret C. Cameron (417/1), Sandra Paterson (418/1), John W. Clingan (419/1), Lynn Bale (420/1), A E. Lancaster (422/1), Alastair Bale (423/1), Andrew Yates (425/1), Jean Taylor (427/1), Jackson Carlaw MSP (428/1), Sylvia M. Gordon (429/1), Andrew & Rita Keane (430/1), Nick Treadgold (431/1), Robert Harrison (432/1), Mrs Joan Marion Adams (433/1), A Hunter (434/1), C Barr (435/1), Allan & Irene McNeilage (436/1), Graham D Paul (438/1), Brendan Harris (439/1), Laura & Alice van den Akker (440/1), Patricia Riddell (441/1), Patricia M. Doran (443/1), Paul Drury (444/1), Moira Harris (445/1), Scot & Elaine van den Akker (446/1), Friends of Huntly Park (448/1), Iain Biggin (449/1), F Greene (455/1), Dr Paul Greig (456/1), Mary MacCallum (468/1), Andrew Morley (469/1), Heather Hughes (479/1), Shirley Wallace (481/1), G Muir (483/1)

- Delete Policy M4 and retain site as greenspace under Policy D5.
- Exclude Huntly playing fields from the M4 master plan area.

#### **(b) Proposal D7.3 Local Biodiversity Sites Giffnock Scrub**

David Henderson (238/1)

- The woodland at the eastern end of the upper park adjacent to the railway line should be included within the area covered by Policy D7.3.

#### **(c) Proposal D8.1: Core Paths**

David Henderson (238/1)



- Existing path from Huntly to Braidpark Drive and thereafter to Muirend Park should be identified within Policy D8.1 as a Core Path or Policy D8.3 as an active travel route.

**(d) Proposal D12.6: Huntly Park: Improvement of football facilities and new build pavilion**

Mary MacCallum (468/1)

- The policy links the upgrading work for new sports pavilion facilities at Huntly Park to housing development occurring under Policy M4. Upgrades to pavilions at other council Sports pitches are not dependent on development. This is differential treatment, the Council should not link improvement of the facility to development at Braidbar.

**Summary of responses (including reasons) by planning authority:**

**(a) Policy M4: Policy M4; Master Plan Braidbar Quarry**

Sport Scotland (7/10), Lorna Alexander (13/1), William Bailey (15/1), Lynsey Craig (16/1), Bob Bryce (17/1), Neil Watson (19/1), Alicia Whyte (20/1), Lyndsay MacLeod (21/1), Anne Philips (24/1), Elaine Grimes (25/1), Mark Heron (26/1), Callum Johnson (27/1), Ross Burns (28/1), Diane Campbell (29/1), Martin Campbell (30/1), Joanna Leslie (31/1), Vicky Lafferty (32/1), Lindsey Coyne (33/1), Louise Chalmers (34/1), Anna Curley (35/1), Mary Walker (36/1), Gail Duff (37/1), Patrick Ruddy (38/1), Alison Ruddy (40/1), Thomas Fay (41/1), Peter Wiggins (42/1), Paul Verrico (43/1), Andrew Jarvis (44/1), Thomas McGuire (45/1), Lesley MacKay (46/1), William Welsh (47/1), Catherine A. S. Welsh (48/1), Sharon De Sykes (49/1), Norma Morrison (50/1), Dan Greenberg (51/1), Alastair Kelly (52/1), Colin McMahon (53/1), Joan Bryans (54/1), Alex Mackie (55/1), Gillian Gordon (57/1), Bernard Conway (58/1), Janet Boe (61/1), Byron Myrden (62/1), Emma Ritchie (63/1), Laura Harrison (64/1), S McGeady (66/1), Gerry Coyle (67/1), Alan Ferguson (68/1), Elizabeth Roberta Ferguson (69/1), Frank Kaye (70/1), Gordon Connell (71/1), Francis Burns (72/1), William Wallace (74/1), Lesley MacDonald (75/1), Nancy Dear (76/1), Caroline Wilkinson (77/1), Pamela Campbell (78/1), Michael Watt (79/1), James Scott (80/2), Gavin Dickson (82/1), Catherine Drew (83/1), Jean M Rankin (84/1), Mr & Mrs W Arnott (85/1), Douglas Harvie (86/1), Alastair I. Grant (87/1), James H Kennedy & Hilary L Kennedy (88/1), Pearl du Feu (89/1), Janet Reid (90/1), Thomas Birkett (91/1), G W Montieth (92/1), Monica Finnegan (93/1), B S Laidlaw (94/1), K Monteith (95/1), Anne Howard (96/1), Tom Carlin & Lucy Macintyre (97/1), P E McKinlay (98/1), Jean MacMillan (99/1), Mrs H G Payne (100/1), Peter Cupples (101/1), David Boyes (102/1), Elaine Boyes (103/1), Alicia Whyte (104/1), Morris Van Looy (106/1), Connie Shields (107/1), Gordon Ingram (108/1), Martina Ingram (109/1), Gerard Fay (110/1), Kim Russell (111/1), Hilary Millar (112/1), Mrs Virginia A. Thomson (115/1), Alison Grossart (116/1), Jill Griffiths (119/1), Amy Edmunds (123/1), Robert Taylor (124/1), Margaret Rae (125/1), Anne B Morrison (128/1), Giffnock Community Council (131/1), The Hutchesons (138/1), James Walker (139/1), W A Philips (141/1), Allan & Ayako Fanning (142/1), Veronica Sutherland (143/1), Mrs Elizabeth Logue (144/1), Kenneth & Leonie Cook (145/1), Mrs Eunice A. Johnston (146/1), James Clokey (148/1), Shirley Triteschler (149/1), Allan G Steele (150/1), Mrs J G Birnie (151/1), David Christie (152/1), John Connor (154/1), Mrs Christine Sharp (155/1), Mrs Norma Lynch (156/1), Ann Elder (157/1), Susan Zeitlin (158/1), John Sharp (159/1), Christine Sharp (160/1), Ivor Britton & Carole Britton

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- The Council acknowledges the support for housing development to assist with a remediation strategy for the site (74/1) (150/1).
- The site was removed from the 2011 Local Plan following a recommendation from the Reporter (CD/@@). The site was introduced to LDP1 and the

Reporter agreed with the Council that the master plan approach promoted through Policy M4 provided adequate protection for the existing greenspace. The Proposed Plan has strengthened the wording of the policy further and the Council is of the opinion that the policy clearly states that development cannot proceed without a comprehensive remediation strategy covering the entire site. Remediation of the unstable quarries remains a Council priority.

- Any remediation strategy would have to address both onsite issues relating to contaminated land and offsite issues relating to construction traffic on surrounding roads. While the M4 designation covers the entire site the policy does not promote development on all areas, M4 is a mechanism to allow for a master planned approach. The master plan will identify those areas of the site that can be developed for specific uses. Master plan proposals will be required to include the elements of an accessible green network, adequate open space and retention of sports pitches and facilities. These are essential elements of any masterplan and are underwritten by the multiple layers of policy that cover the M4 site.
- The Council acknowledges that Scottish Planning Policy (SPP) (CD/@@) seeks to safeguard outdoor sports facilities from development other than in certain specified circumstances. The Huntly Playing fields are protected under Policy D12.6 and Policy D13 in accordance with SPP. The safeguarding and upgrading of these facilities is also integral to the master plan. Likewise Policy D7.3 ensures protection and mitigation for the area designated as the Local Biodiversity Site.
- The site is clearly identified as a longer term development opportunity and is not listed as a housing site within Schedule 15. The site does not contribute to the effective or established housing land supply or been included in any education analysis.
- In preparing the Proposed Plan considerable detailed research and analysis was undertaken to inform long term planning of educational infrastructure and understanding of requirements. A Report to Council on 31st October 2018 (CD/@@) considered the results of this research and analysis. Para 32 and 33 of this report were clear that *'any residential development at the former Braidbar Quarry site ... would have an impact on education provision, especially the denominational sector.....the site at Braidbar could not be taken forward until an appropriate and implementable remediation strategy has been developed and an agreed solution found regarding meeting educational provision'*. The requirement to address education needs is also clearly addressed in para 1 of Policy M4. This position is supported by the representation from the Council's Education Department (170/3).
- Policies D4 and D5 offer strong protection for the protection for both the green network and greenspace. It is noted that a large number of representations list support for Policies D4, D5, and D7.3. This support is welcomed within the context of the wider M4 masterplan policy. The Council believes that the policy approach of M4 provides a balanced way forward for remediation of unstable ground which integrates the protection and enhancement of the environment and community facilities within the master plan boundary.
- It is not proposed to modify the Plan based upon the above.

**(b) Proposal D7.3 Local Biodiversity Sites Giffnock Scrub**

David Henderson (238/1)

- The Council can confirm that the eastern area of woodland referred to is part of the Giffnock Scrub Local Biodiversity Site and its exclusion from the D7.3 designation is a minor mapping error.
- In order to correct this error if the Reporter was so minded the Council would be supportive of adjusting the boundary to incorporate this woodland area within the Giffnock Scrub Local Biodiversity Site. (Figure 1)

### **(c) Proposal D8.1: Core Paths**

David Henderson (238/1)

- The Council notes the request to incorporate the path from Huntly to Braidbar into the Core Path Plan or identify the route as an active travel route in Schedule 6. Schedule 6 lists path networks rather than individual paths, inclusion of the Braidbar Path will depend on the scope of active travel projects. The LDP process cannot add a path to the Core Paths Plan but the Council will be undertaking a review of the Core Paths Plan and the Braidbar path will be considered for core path adoption during this process.
- It is not proposed to modify the Plan based on the above.

### **(d) Proposal D12.6: Huntly Park: Improvement of football facilities and new build pavilion**

Mary MacCallum (468/1)

- The Council notes the objection to the improvement of sport's facilities being linked to development under Policy M4. The Policy is intended to ensure that any development proposal under M4 consider the whole site as defined by the M4 boundary, including the pavilion and sports pitches. Development under M4 is dependent on a comprehensive remediation strategy across the whole site, and there are unstable areas in close proximity to the pitches which will require remediation. The Policy provides a mechanism where by community facility improvements could be facilitated as part of wider remediation and development. The Huntly Playing fields are protected designated under Policy D12.6 and Policy D13.
- It is not proposed to modify the Plan based on the above.

### **Site Evaluation and Strategic Environmental Assessment**

Jane Floyd (173/2), Susan Grant (263/2), Giffnock Community Council (131/2)

- Representations objected to the scoring and findings of the Site Evaluation (CD/@@) and Strategic Environmental Assessment (CD/@@).
- The site evaluation study was prepared to assist with the identification of sites to be included in the Proposed Plan. The assessment methodology along with the SEA, together provide a consistent, robust and objective framework for the assessment of land use proposals. The site evaluation methodology is thorough and robust and provides a fair and consistent method of ranking and comparing alternative sites.
- This approach has been applied consistently across all sites and has been agreed as an accepted methodology by Reporters at previous LDP examinations. The Council stands by the outcomes of these exercises.

- Site CS014 Braidpark Drive was promoted for residential development separately to the wider masterplan and has been evaluated accordingly. The policy is clear that the whole site must be considered together under a master plan approach to ensure a comprehensive remediation strategy can be implemented. The Council is not supportive of piecemeal individual developments at Braidbar.
- The SEA clearly identifies environmental effects on policies and proposals and potential mitigation measures. Comments from the SEA gateway and other organisations will be inform the next stage of the SEA process as referred to further under Issue 1. The Council believes that the policy approach of M4 provides a balanced way forward for remediation of unstable ground which integrates the protection and enhancement of the environment and community facilities within the master plan boundary.
- It is not proposed to modify the Plan based on the above.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue 7</b>	<b>Placemaking and Design</b>	
<b>Development plan reference:</b>	Policy D1: Placemaking and Design Policy D1.1: Extensions and Alterations to Existing Buildings for Residential Purposes	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Sportscotland (7/3)          Andrew Bennie Planning (171/2)          Scottish Natural Heritage (178/3)          Persimmon Homes (397/1)          Miller Homes (463/2)          Cala Homes (464/3)          Homes for Scotland (476/8) (476/9)          Wallace Land Investments (489/4)          Robertson Homes (495/2)          Avant Homes (504/3)</p>		
<b>Provision of the development plan to which the issue relates:</b>	Section 3: Creating Sustainable Places and Communities Pages 50 to 54	
<b>Planning authority's summary of the representation(s):</b>		
<p><b><u>(a) Policy D1: Placemaking and Design</u></b></p> <p><b><u>Support</u></b></p> <p><u>Sportscotland (7/3)</u></p> <ul style="list-style-type: none"> <li>• Policy welcomed as it seeks to protect and improve spaces which provide opportunities to participate in sport, recreation and have responsible access.</li> </ul> <p><b><u>Objections</u></b></p> <p><u>Andrew Bennie Planning (171/2)</u></p> <ul style="list-style-type: none"> <li>• Whilst general support is given to the terms of Policy D1: Place making and Design, objection is made to the terms of criterion 13 of the Policy which states that "Backland development should be avoided".</li> <li>• The range of criteria detailed under Policy D1 are considered to be sufficient to allow for appropriate control to be exercised over the form of development which comes forward within the plan area and it is not considered necessary to "single out" backland development as being a special case in relation to which there is a de facto presumption against.</li> </ul> <p><u>Scottish Natural Heritage (178/3)</u></p>		

- Consider layout to be an important consideration in development design and it could be included in Criteria 2 to provide further detail.
- Criteria 6 includes the requirement to “Respond to and complement” landscape character. Suggest that landscape setting is also included.

#### Persimmon Homes (397/1)

- Do not support Criteria 12: presumption against all proposals that require land raising. Sites are rarely completely flat and in order for surface water to drain to a suitable outlet areas of the site may need to be raised to comply with Scottish Water policy. Development will therefore almost always involve an element of land raising and should not be rejected on this basis.

#### Miller Homes (463/2), Wallace Land Investments (489/4), Avant Homes (504/3)

- D1 is unnecessarily restrictive. Object to Criteria 6 and 12 as follows:
- Criteria 6: Clydeplan requires new development to not undermine the objectives rather than not impact adversely upon.
- Criteria 12: Only proposals that identify a significant and adverse impact upon the visual and physical connections should be resisted.

#### Homes for Scotland (476/9), Robertson Homes (495/2)

- Support the broad aims of Policy D1. However, Criteria 12 on landraising is unnecessarily restrictive in setting a general presumption against all proposals that involve landraising. While landraising can have an impact upon landscape, this can be beneficial by improving land drainage or solar gain potential and is not inherently detrimental. Consider that this element of the policy should be amended.

### **(b) Policy D1.1: Extensions and Alterations to Existing Buildings for Residential Purposes**

#### **Objections**

#### Homes for Scotland (476/8)

- Objects to 4th para on page 54. The justification for the policy appears to be ill thought-out compared to reasonable alternatives which would achieve its ostensible objective of improving choice and affordability in the housing market.
- It is within the Council’s gift to allocate more land, increase choice and address stretched affordability. If supply is constricted and new opportunities are not available, then it is unsurprising that some homeowners will look to extend their existing properties to accommodate growing families or changed circumstances. The proposed policy gives the impression of a strongly negative and zero-sum approach to development and policy making. It is inconsistent with pursuing sustainable economic growth and addresses a potential symptom of undersupply rather than the cause.

#### **Modifications sought by those submitting representations:**

**(a) Policy D1: Placemaking and Design**Andrew Bennie Planning (171/2)

- Criteria 13 should be deleted from the terms of Policy D1 and that the remaining criteria be renumbered accordingly.

Scottish Natural Heritage (178/3)

- Recommend the following revisions: Criteria 2: “The proposal should be appropriate to its location, be of a high quality and of a size, scale, height, massing, density and *layout* that is in keeping with the buildings in the locality...”
- Recommend the following revisions: Criteria 6: “Respond and complement...green belt, landscape character *and setting*...”

Miller Homes (463/2), Wallace Land Investments (489/4), Avant Homes (504/3)

- Recommend the following revisions: Criteria 6: Respond to and complement site topography *where possible* and not ~~impact adversely upon~~ *undermine* the green belt *objectives* and landscape character, green networks, features of historic interest, landmarks, vistas, skylines and key gateways. Existing buildings and natural features of suitable quality, should be retained and sensitively integrated into proposals including greenspace, trees and hedgerows;
- Recommend the following revisions: Criteria 12: ~~There will be a general presumption against all proposals that involve landraising. Where there is a justifiable reason for landraising, proposals must have regard to the scale and visual impact of the resultant changes to the local landscape and amenity.~~ Proposals that *are demonstrated to have significant* adversely impact upon the visual and physical connections through the site and to the surrounding areas will be resisted.

Homes for Scotland (476/9), Robertson Homes (495/2)

- Recommend the following revisions: Criteria 12: ~~There will be a general presumption against all proposals that involve landraising. Where there is a justifiable reason for landraising, proposals must have regard to the scale and visual impact of the resultant changes to the local landscape and amenity.~~ Proposals that adversely impact upon the visual and physical connections through the site and to the surrounding areas will be resisted.

**Summary of responses (including reasons) by planning authority:****(a) Policy D1: Placemaking and Design****Support**Sportscotland (7/3)

- The Council acknowledges and welcomes the support for Policy D1.
- It is not proposed to modify the Plan based upon the above.



## Objections

### Andrew Bennie Planning (171/2)

- 'Backland' is an accepted and well understood planning term. The criterion augments the other placing making criteria in the policy.
- It is not proposed to modify the Plan based upon the above.

### Scottish Natural Heritage (178/3)

- In recognition of the importance of the placemaking agenda of the Proposed Plan the Council agrees with the suggested text to insert reference to 'layout' within criterion 2 and landscape setting into criterion 6 of Policy D1: Placemaking and Design.
- If the Reporter is so minded to recommend that the representation from SNH is accepted and the Plan modified, as set out below, the Council would be supportive of these modifications because they would strengthen the policy.
- Criterion 2 should be amended to read (revised text in italics):
  - The proposal should be appropriate to its location, be of a high quality and of a size, scale, height, massing, density and *layout* that is in keeping with the buildings in the locality...
- Criterion 6 should be amended to read (revised text in italics):
  - Respond to and complement site topography ...green belt, landscape character *and setting*...

### Miller Homes (463/2), Wallace Land Investments (489/4), Avant Homes (504/3)

- The Council does not agree with the revised wording suggested. It is viewed that the policy provides a strong policy framework for considering impacts upon the green belt, landscape character etc. The Council is supportive of the modifications proposed by Scottish Natural Heritage (178/3). No further changes required.
- It is not proposed to modify the Plan based upon the above.

### Miller Homes (463/2), Wallace Land Investments (489/4), Avant Homes (504/3), Homes for Scotland (476/9), Robertson Homes (495/2)

- The policy states that there is a 'general presumption' and does not preclude all landraising. Instead it seeks to ensure that developments comply with the aims of Scottish Planning Policy (SPP) (CD/@@) and Designing Streets policies (CD/@@).
- One of the key principles of SPP is that 'Planning should support development that is designed to a high-quality, which demonstrates the six qualities of a successful place. This principle is reinforced by paras 41 to 46 of SPP which reflects Designing Streets. LDPs should promote efficient use of land, protect and enhance landscape features, the natural environment, and biodiversity. These factors are clearly set out under Policy D1.
- Extensive landraising can involve extracting/exporting or importing significant quantities of earth. This is considered not to be resource efficient and can significantly impact on the natural resources, ecological habitats and landscape features on sites.
- The Council would state that this indicates that these factors should be carefully considered in developing a new housing layout as oppose to substantial eliminating these features through landraising. It would also state that utilising the topography

can add visual interest and character thereby creating distinctiveness and identity to a development.

- In addition, Designing Streets (page 19) seeks that new developments provide 'good connectivity for all modes of movement and for all groups ... respecting inclusion'. It also indicates (page 17) that designers should work within the constraints of the site. The Council would state in order to allow access for all, to ensure that there is physical and visual connection and integration between the site and its surroundings, and to promote permeability, to ensure that development does not create poor links thereby creating enclaves/isolated developments as required by Designing Streets, development that includes significant and extensive landraising and the creation of elevated development platforms above adjacent land/surroundings should be resisted.
- SPP (Para 265) states that landraising should only be considered in exceptional circumstances and should be avoided where it could adversely impact on other areas. The Council recognises that there may be circumstance, such as drainage, where landraising is required. However in the first instance developers should investigate incorporating alternative SUDs such as swales within a site rather than 'tilting' the land through landraising to drain the site to one outlet. In addition, developers in large scale release areas should work together to drain sites to more than one outlet.
- It is not proposed to modify the Plan based upon the above.

#### **(b) Policy D1.1: Extensions and Alterations to Existing Buildings for Residential Purposes**

#### **Objections**

##### Homes for Scotland (476/8)

- The Council disagrees with the representation from Homes for Scotland. The Proposed Plan is clear that there is a requirement for new residential development proposals to provide a range of house sizes, types and tenures through Policy SG2. However, the Council also recognises the importance of protecting the existing stock of smaller homes to allow a balanced housing market within the area and to have a range of properties available for first time buyers and downsizers. Para 4 is also clear that extensions and demolitions can significantly impact upon the character and amenity of existing neighbourhoods and seeks to protect these areas from inappropriate proposals.
- The Development Strategy of the Proposed Plan together with the section on 'Education Infrastructure' (pg78) also recognises the significant implications of further residential development, including from the 2nd hand housing market on the existing school estate. It is felt important to highlight this particular issue within this section. The Councils approach to Education and Housing matters are further documented under Issue 2, Issue 13 and Issue 14.
- It is viewed that Policies D1.1 and D1.2 provide a strong policy framework for considering proposals for extensions, alterations, sub-division and replacement.
- It is not proposed to modify the Plan based upon the above.

**Reporter's conclusions:**

**Reporter's recommendations:**

<b>Issue 8</b>	<b>Green Belt</b>	
<b>Development plan reference:</b>	Policy D3: Green Belt and Countryside around Towns (CAT) Policy D3.3: New Build Housing	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>David Williamson (117/1)          Andrew Bennie Planning (171/1)          Scottish Natural Heritage (178/4)          Woodland Trust Scotland (376/2)          Persimmon Homes (397/3)          Miller Homes (463/6)          Cala Homes (West) (464/6)          Homes for Scotland (476/6)          Wallace Land Investments (489/7)          Robertson Homes (495/4)          Gladman Developments Ltd (503/5) (503/7)          Avant Homes (504/6)          Gladman Developments Ltd (571/5) (571/6)</p>		
<b>Provision of the development plan to which the issue relates:</b>	Section 3: Creating Sustainable Places and Communities Page 56 to 59	
<b>Planning authority's summary of the representation(s):</b>		
<p><b><u>(a) Policy D3: Green Belt and Countryside around Towns (CAT)</u></b></p> <p><u>Support</u></p> <p><u>Woodland Trust Scotland (376/2)</u></p> <ul style="list-style-type: none"> <li>• Support policy.</li> </ul> <p><b><u>Objections</u></b></p> <p><u>Andrew Bennie Planning (171/1)</u></p> <ul style="list-style-type: none"> <li>• Objection to green belt boundary dissecting garden curtilage at number 379 Glasgow Road, Waterfoot.</li> <li>• Seek confirmation of boundary of green belt.</li> </ul> <p><u>Scottish Natural Heritage (178/4)</u></p>		

- Note that the text in relation to boundary treatment and landscape framework has not been included in the Proposed Plan. We consider this to be a useful aspect of the Plan and recommend that it is included.

#### Persimmon Homes (397/3)

- This policy in its current format would preclude any development on green belt sites. The policy promotes a strategy of consolidation and regeneration of the urban areas and restricts development on green belt however as the availability of unconstrained brownfield sites reduces further consideration should be given to appropriate green belt proposals which include mitigation to strengthen and enhance green belt objectives and do not have adverse impacts upon the landscape. Appropriate infill development presents an opportunity to enhance the green belt boundary in towns and villages helping to preserve and strengthen the settlement/ green belt edge. The policy should set out clear concise criteria on where green belt development would be accepted especially in cases were a shortfall in the 5yr housing land supply arises.
- Disagree with the proposals to cover green belt and countryside allocations within one policy. By potentially applying the same policy restrictions as green belt on countryside area is not consistent with SPP, which requires new green belt designations to be justified.
- A policy covering countryside should be significantly less restrictive. It should allow infill development and smaller scale housing development subject to the usual design and context policies. Smaller settlements will also have need for new housing regardless of the bigger picture on housing land supply.

#### Miller Homes (463/6), Cala Homes (West) (464/6), Wallace Land Investments (489/7), Avant Homes (504/6)

- The text relating to Policy D3 does not accord with the policy requirements set out in Clydeplan.
- Local Authorities are required to provide a minimum of five years effective land supply at all times for each Housing Sub-Market Area and for each Local Authority. Where a shortfall in the five year effective housing land supply is identified, housing developments located in the green belt can be granted planning permission.

#### Homes for Scotland (476/6), Robertson Homes (495/4)

- Both the green belt and countryside policies should make exceptions for when there is a shortfall in five-year housing land supply.
- The conflation between countryside and green belt is inconsistent with SPP. The policy on countryside should be significantly less obstructive. It should allow infill development and smaller scale housing development subject to the usual design and context policies. Smaller settlements will have need for new housing regardless of the wider picture on housing land supply and this will provide opportunities for small scale homebuilders.

#### Gladman Developments Ltd (503/5)

- Support and endorse Homes for Scotland submission.
- Question the blanket green belt designation across the authority. Quoting SPP (paras 49 – 51). Considers SPP not to have influenced the green belt designation

across the authority. In its current form the green belt designation restricts edge of settlement development despite being a potentially sustainable and appropriate location for development, rather than directing planned growth in line with SPP and Clydeplan.

- In addition the policy should make exceptions when there is a short-fall in the 5 yr. supply of effective land. Clydeplan policy 8 allows for shortfalls to be addressed on greenfield or brownfield including green belt.

Gladman Developments Ltd (571/5)

- Policy D3 does not comply with SPP which states that for most settlements a green belt is not necessary as other polices can provide an appropriate basis for directing development to the right locations.
- SPP states that Local Authorities should identify the most sustainable locations for longer term development and where necessary review the boundaries of the green belt.
- The spatial form of the green belt should be appropriate to the location, it may encircle a settlement or take the shape of a buffer, corridor, strip or wedge. LDP's should show the detailed boundary of any green belt.

**(b) Policy D3.3: New Build Housing**

**Support**

David Williamson (117/1)

- No new build housing within the green belt.
- Welcome restrictions on development within the green belt and that there are no identified locations within Eaglesham and Waterfoot.

**Objections**

Gladman Developments Ltd (503/7) (571/6)

- Similar to recommendations for Policy D3, an exception should be included within policy D3.3 as well or instead, to allow development within the green belt or countryside when there is a shortfall in the five-year effective housing land supply.

**Modifications sought by those submitting representations:**

**(a) Policy D3: Green belt and Countryside around Towns (CAT)**

Scottish Natural Heritage (178/4)

- Recommend including the following text in Policy D3 at the end of Para 2 as follows:  
 "...surrounding rural area. *Proposals should ensure they provide well-designed landscape treatment, reflecting local landscape character. Robust and appropriate boundary treatments and landscape frameworks using high-quality materials and/or planting should be incorporated into proposals to minimise the visual impact of the development on the surrounding landscape. Existing trees, hedgerows and stone*

*walls should be retained and enhanced where possible. New planting must be with native species. Landscape treatment should be secured through the use of appropriate design tools and developer requirements”.*

Miller Homes (463/6), Cala Homes (West) (464/6), Wallace Land Investments (489/7), Avant Homes (504/6)

- Recommend including the following text in Policy D3 Para 2 as follows:  
Proposals should be designed to complement the surrounding landscape ensuring that there are no *significant* adverse landscape or visual impacts, seek to ensure that the integrity of the landscape character and setting is maintained or enhanced as informed by the Council’s Green Belt Landscape Character Assessment (LCA). Proposals should not be suburban in character or scale and should have no *significant* adverse impacts upon the amenity of the surrounding rural area.
- Recommend the inclusion of an additional Para after Para 4. as follows:  
*Where it is demonstrated that a five year effective housing land supply is not maintained at all times as set out in Policy SG1, new housing development can be granted planning permission in both the green belt and CAT subject to meeting the criteria specified.*

Persimmon Homes (397/3), Homes for Scotland (476/6), Robertson Homes (495/4)

- The policy should be split into 2 separate policies.

### **(b) Policy D3.3: New Build Housing**

Gladman Developments Ltd (503/7) (571/6)

- Exception should be included within policy D3.3 as well or instead, to allow development within the green belt or countryside when there is a shortfall in the five-year effective housing land supply.

## **Summary of responses (including reasons) by planning authority:**

### **(a) Policy D3: Green Belt and Countryside around Towns (CAT)**

#### **Support**

Woodland Trust Scotland (376/2)

- The Council acknowledges and welcomes the supporting comments.
- It is not proposed to modify the Plan based upon the above.

#### **Objections**

Andrew Bennie Planning (171/1)

- A minor change was made to the green belt boundary in preparation of the Proposed Plan to ensure that it more accurately reflected features on the ground at this location. This is clearly shown on the Proposal Map.
- No further modifications are required.

Scottish Natural Heritage (178/4)

- The Council is of the view that boundary treatment and landscaping matters are adequately covered by criterion 7 of Policy D1: Placemaking and Design and these matters do not need to be repeated within Policy D3.
- It is not proposed to modify the Plan based upon the above.

Persimmon Homes (397/3), Miller Homes (463/6), Cala Homes (West) (464/6), Homes for Scotland (476/6), Wallace Land Investments (489/7), Robertson Homes (495/4), Avant Homes (504/6), Gladman Developments Ltd (503/5), Gladman Developments Ltd (571/5)

- Modifications were sought to the proposed plan to that allow exceptions for situations when there is a shortfall in five-year housing land supply and for a separate policy that would support a less restrictive approach in the Countryside Around Towns (CAT) designation.
- Paragraph 49 of Scottish Planning Policy (SPP) (CD/@@) states that the development plan may designate a green belt around a city or town to support the spatial strategy by:
  - directing development to the most appropriate locations and supporting regeneration;
  - protecting and enhancing the character, landscape setting and identity of the settlement; and
  - protecting and providing access to open space.
- Paragraph 50 states that planning authorities should identify the most sustainable locations for longer-term development and, where necessary, review the boundaries of any green belt. SPP states in paragraph 51 that a green belt ‘may encircle a settlement or take the shape of a buffer, corridor, strip or wedge’ and that ‘Local development plans should show the detailed boundary of any green belt,...’. Paragraph 52 requires LDPs to describe the types and scales of development which would be appropriate in the green belt, and gives an indication of what these may include.
- The importance and role of the green belt is also a key component of Clydeplan (CD/@@) and its role in delivering the spatial development strategy as documented in Policy 14. Clydeplan states that the LDPs should identify the inner and outer boundaries of the green belt and to ensure that the strategic objectives set out in Para 8.15 are met including directing planned growth to the most appropriate locations, safe-guarding identity through place setting, protecting the separation between communities and protecting the character, landscape setting and identity of settlements. Clydeplan is clear that the green belt is integral to delivering a development pattern vital to achieving the Plan’s vision. This approach accords with SPP.
- The Development Strategy of the Proposed Plan provides the framework for managing change and shaping how the area will develop in the future. The focus is on regeneration and consolidation of the urban areas and the enhancement of existing places. No additional housing releases or amendments to the green belt boundary were proposed. Green belt boundaries are particularly important in directing development to the right locations to achieve the overall objectives of the Plan. The Proposed Plan Proposals Map clearly identifies the inner and outer boundaries of the green belt in accordance with SPP and Clydeplan.
- Through Policy D3, the Proposed Plan identifies a green belt and sets out what types of development will be acceptable within it. This is complemented by Policies

D3.1 to D3.3, which sets out the circumstances when other housing proposals would be considered in the green belt.

- The green belt boundary was reviewed during the preparation of the adopted LDP1 (CD/@@) utilising the principles in SPP. It set out a sustainable, robust and defensible boundary, providing a defence to unplanned growth and reflecting a long term settlement strategy. A number of sites were released from the Green belt in LDP1, both larger master plan sites such as Maidenhill (Policy M2.1) and Barrhead South (Policy M2.2) and smaller individual proposals such as at Neilston (SG1.18 to SG1.20)(Proposed LDP2 references Schedule 15). This boundary and approach was supported by the Reporter at the Examination to LDP1 (CD/@@).
- An updated Green belt and Landscape Character Assessment was undertaken in 2016 and has informed the Strategy and green belt boundary for the Proposed Plan. Further information is set out in Green Belt Landscape Character Assessment (CD/@@) and the Green Belt Landscape Character Assessment Background Report (BR2) (CD/@@).
- It is considered that the East Renfrewshire green belt accords with the principles and requirements of SPP and Clydeplan, and that it remains an important element of the Proposed Plans Development Strategy.
- Strategic Policy 1 seeks to protect and enhance the green belt and countryside around towns designations. Strategic Policy 1 and Policy SG1 also apply a sequential approach to new development which prioritises brownfield sites in the urban area. The policies clearly state that sites within the green belt will only be considered for development where it has been demonstrated that a suitable site does not exist in the urban area. This criteria is a key requirement for all new proposals in the green belt to prevent urban sprawl and further loss of green belt.
- It was requested that Policy D3 include a reference to supporting new housing development in the green belt where it is demonstrated that a 5 year effective housing land supply is not met. It is viewed that Policy D3 in combination with Strategic Policy 1, Policy SG1 and Policies D3.1 to D3.3 provide a suitable policy framework for considering new residential development proposals in the green belt or countryside around towns and for directing development to suitable locations. Policy SG1 specifically covers this issue under Paragraph 5. There is no requirement to include the proposed amendments in Policy D3.
- Policy D3 deals with development in both the green belt and wider rural area, setting out the circumstances in which it may be allowed. The policy is clear that within the green belt and countryside, limited development will only be permitted and should complement and protect the rural character. The restrictive approach to housing development in the rural areas as a whole is justified because the plan area is subject to ongoing development pressures. This approach accords with Paragraph 81 of SPP which states that *“In accessible or pressured rural areas, where there is a danger of unsustainable growth in long-distance car-based commuting or suburbanisation of the countryside, a more restrictive approach to new housing development is appropriate, and plans and decision-making should generally: guide most new development to locations within or adjacent to settlements; .....”*
- The approach in Policy D3 is appropriate for assessing development proposals throughout the rural area, and reflects SPP. There is therefore no justification for a less restrictive approach in the countryside around towns designation or for the policy to be split into separate policies.
- The Council disagrees with the representation that emphasis should be given to ‘significant’ impacts within the 2<sup>nd</sup> Paragraph of Policy D3. The policy is clear that proposals should not impact negatively upon the landscape.



- All sites submitted through the Call for Sites stage as well as additional sites suggested through the Main Issues Report consultation stage (CD/@@) were assessed in detail to see the appropriateness of each site. The site selection process is set out in the Site Evaluation Background Report (CD@@) and covered issues such as landscape and visual sensitivity, coalescence and long term integrity of the green belt. The site evaluation methodology is thorough and robust and provides a fair and consistent method of ranking and comparing alternative sites. Alternative sites that were promoted for residential development are considered under issues 20 to 27. The Council is not recommending the inclusion of any of these alternative proposals in the Proposed Plan.
- The Council is of the opinion that Policy D3 and Policies D3.1 to D3.3 are consistent with SPP, Clydeplan and as the Proposed Plan already provides a generous housing land supply, as demonstrated under Issue 2, Issue 13 and Issue 14, there is no numerical or policy justification for additional green belt land to be identified to meet housing needs. It is recommended that the green belt boundary is maintained and protected. As such, no modifications to Policy D3 or Policies D3.1 to D3.3 are required.
- It is not proposed to modify the Plan based upon the above.

### **(b) Policy D3.3: New Build Housing**

#### **Support**

David Williamson (117/1)

- The Council acknowledges and welcomes the supporting comments.
- It is not proposed to modify the Plan based upon the above.

#### **Objections**

Gladman Developments Ltd (503/7) (571/6)

- As explained above the Council is of the view that Policy D3 in combination with Strategic Policy 1, Policy SG1 and Policies D3.1 to D3.3 provide a suitable policy framework for considering new residential development proposals in the green belt or countryside around towns and for directing development to suitable locations. There is no requirement to include the proposed amendments in Policy D3.3.
- In addition as demonstrated under Issue 2, Issue 13 and 14 the Proposed Plan provides a generous housing land supply to meet the requirements of SPP and Clydeplan and there is no numerical or policy justification for additional green belt land to be identified to meet housing needs.
- It is not proposed to modify the Plan based upon the above.

**Reporter's conclusions:**

**Reporter's recommendations:**

<b>Issue 9</b>	<b>Green Infrastructure</b>	
<b>Development plan reference:</b>	Policy D4: Green Networks and Infrastructure	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>SportScotland (7/4)  GoBike (174/3)  Scottish Natural Heritage (178/5)  Broom, Kirkhill and Mearnskirk Community Council (255/9) (255/10) (255/11) (255/12)  Woodland Trust Scotland (376/3) (376/4)  Jackson Carlaw MSP (428/5)  Thomas Cornwallis (471/4)</p>		
<b>Provision of the development plan to which the issue relates:</b>	Section 3: Creating Sustainable Places and Communities Schedule 3: Green Networks and Projects Pages 60 to 62	
<b>Planning authority's summary of the representation(s):</b>		
<p><b><u>(a) Policy D4: Green Networks and Infrastructure</u></b></p> <p><b><u>Support</u></b></p> <p><u>Sport Scotland (7/4)</u></p> <ul style="list-style-type: none"> <li>Policy welcomed as it seeks to protect &amp; improve spaces which provide opportunities to participate in sport, recreation and have responsible access.</li> </ul> <p><u>GoBike (174/3), Thomas Corwallis (471/4)</u></p> <ul style="list-style-type: none"> <li>Welcome the mention in D4.9 (Netherlee master plan) of improving active travel links between Netherlee, Stamperland and the Primary School, given the high proportion of children who are currently driven to school in East Renfrewshire. The railway line in this area forms a barrier to active travel, encouraging car use and a new bridge over the railway will make it feasible for people of all ages to walk and cycle in this area.</li> </ul> <p><u>Broom, Kirkhill and Mearnskirk Community Council (255/9) (255/10) (255/11) (255/12)</u></p> <ul style="list-style-type: none"> <li>Support policy D4, D4.7 Rouken Glen Park, D4.11 Maidenhill/Malletsheugh and D4.12 enhanced greenspace at Mearns, Crookfur and Shawwood Parks.</li> </ul> <p><u>Woodland Trust Scotland (376/3)</u></p>		

- Support this policy as written- particularly requirement that green network provision will form a core component of any masterplan or development brief. Ensuring highest quality green network development incorporated from early stage.

Jackson Carlaw MSP (428/5)

- Support the retention of land to the west of Waterfoot as Green Network.
- Support the retention of Broomburn Park as Green Network and open space.

**Objections**

Scottish Natural Heritage (178/5)

- Where a proposal impacts adversely on the character or function of the green network, proposals may be required to contribute to enhancing any remaining, or create new green infrastructure and green network in accordance with Strategic Policy 2 and D6”, could be strengthened to ensure the delivery of new or enhanced green infrastructure provision.

**(b) Proposal D4.8: Cowdenhall adj. to Cofthead Mill, Neilston**

Woodland Trust Scotland (376/4)

- D4.8 (schedule 3) ‘Access & woodland management’ wording should be extended with a further references to the protection of woodland and enhancement with suitable native tree species.

**Modifications sought by those submitting representations:**

**(a) Policy D4: Green Networks and Infrastructure**

Scottish Natural Heritage (178/5)

- Recommend making the following amendment to paragraph 4 of Policy D4: Green Networks and Infrastructure:  
“When a proposal impacts adversely on the character or function of the green network, proposals ~~may~~ *will* be required to contribute to enhancing any remaining, or create new green infrastructure and green networks in accordance with Strategic Policy 2 and D6”.

**(b) Schedule 3 - Proposal D4.8: Cowdenhall adj. to Cofthead Mill, Neilston**

Woodland Trust Scotland (376/4)

- In Schedule 3 D4.8 insert additional policy wording:  
“Protection of woodland area and enhancement including planting with suitable native tree species”.

**Summary of responses (including reasons) by planning authority:**

**(a) Policy D4: Green Networks and Infrastructure**

**Support**

Sport Scotland (7/4), GoBike (174/3), Thomas Corwallis (471/4), Broom, Kirkhill and Mearns Kirk Community Council (255/9) (255/10) (255/11) (255/12), Woodland Trust Scotland (376/3), Jackson Carlaw MSP (428/5)

- The Council acknowledges and welcomes the support for Policy D4 and projects set out in Schedule 3.
- It is not proposed to modify the Plan based upon the above.

**Objections**

Scottish Natural Heritage (178/5)

- The Council agrees with the proposed amendment.
- If the Reporter is so minded to recommend that the representation from SNH is accepted and the Plan modified, as set out below, the Council would be supportive of this modification.

Para 4 of Policy D4 should be amended to read (revised text in italics):

Where a proposal impacts adversely on the character or function of the green network, proposals *may will* be required to contribute to enhancing any remaining, or create new green infrastructure and green networks in accordance with Strategic Policy 2 and D6.

**(b) Schedule 3 - Proposal D4.8: Cowdenhall adj. to Cofthead Mill, Neilston**

Woodland Trust Scotland (376/4)

- The Council agrees in part with the suggested text and amendments proposed. However, to ensure the modification links with Policy D1 Criterion 11 and Policy D7 Criterion 3 the Council has proposed some revised wording
- If the Reporter is so minded to recommend that the representation from Woodland Trust Scotland is partly accepted together with revised wording from the Council and the Plan modified, as set out below, the Council would be supportive of this modification.

Schedule 3 Proposal D4.8 – insert the following text after ‘Access and woodland planting management’ in the description field (revised text in italics):

*Protection of woodland area and enhancement of the habitat and biodiversity of the area.*

**Reporter’s conclusions:****Reporter’s recommendations:**

<b>Issue 10</b>	<b>Greenspace and Open space</b>	
<b>Development plan reference:</b>	Policy D5 Protection of Urban Greenspace Policy D6 Open Space Requirements in New Developments	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
Sport Scotland (7/5) Scottish Natural Heritage (178/6) (178/7) Woodland Trust Scotland (376/5)) Church of Scotland General Trustees (499/2)		
<b>Provision of the development plan to which the issue relates:</b>	Section 3: Creating Sustainable Places and Communities Schedule 4: Open Space Requirements Pages 63 to 65	
<b>Planning authority's summary of the representation(s):</b>		
<p><u>Sport Scotland (7/5)</u></p> <ul style="list-style-type: none"> <li>Certain policies have direct implications for participation in sport &amp; recreation. Both policies are welcomed as they seek to protect &amp; improve spaces which provide opportunities to participate in sport, recreation and have responsible access.</li> </ul> <p><u>Scottish Natural Heritage (178/6) (178/7)</u></p> <ul style="list-style-type: none"> <li>The inclusion of policy D5 is welcomed. However, greater detail could be provided in relation to alternative urban greenspace provision to ensure that it is high quality and in a convenient location.</li> <li>Support the emphasis given to green infrastructure in policy D6 and the requirement for it (open space) to be integrated into the design approach from the outset.</li> <li>However, the requirements set out for D6 in in Schedule 4: Open Space Requirements are not in line with the accepted approach set out in both East Renfrewshire's LDP1 and paragraph 31 of PAN65: Planning and Open Space. The latter states that quantity, the "amount of space per house unit or head of population", should be included in standards. Basing open space requirements on the number of habitable rooms could also lead to lower provision of open space, particularly where most needed.</li> </ul> <p><u>Woodland Trust Scotland (376/5)</u></p> <ul style="list-style-type: none"> <li>Welcome and support policy D6.</li> </ul> <p><u>Church of Scotland General Trustees (499/2)</u></p>		

- The Policy D5 designation should not apply at location Mearns Kirk Glebe (LDP2-23) because it is a private open space where there is no public access. The land covered by D5 does not perform any significant function in terms of nature conservation its main function is the setting of the Kirk.
- 

#### **Modifications sought by those submitting representations:**

##### Scottish Natural Heritage (178/6)

- Recommend inserting the following text into Policy D5: Protection of Urban Greenspace:  
“Appropriate mitigation is provided as part of the development for *high quality* alternative provision *within a convenient distance* of at least equal biodiversity, community benefit and accessibility”.

##### Scottish Natural Heritage (178/7)

- Recommend amending Schedule 4: Open Space Requirements so that it is in line with paragraph 31 of PAN65: Planning and Open Space. A similar approach could be taken to that of East Renfrewshire’s LDP1.

##### Church of Scotland General Trustees (499/2)

- The relevant part of the Mearns Kirk Glebe site (LDP2-23) should be removed from the terms of Policy D5.

#### **Summary of responses (including reasons) by planning authority:**

##### Scottish Natural Heritage (178/6)

- The Council agrees with the suggested text and amendments proposed in relation to mitigation for the loss of greenspace.
- If the Reporter is so minded to recommend that the representation from SNH is accepted and the Plan modified, as set out below, the Council would be supportive of this modification.

Para 3 of Policy D5 3<sup>rd</sup> bullet should be amended to read (revised text in italics):  
Appropriate mitigation is provided as part of the development for *high quality* alternative provision *within a convenient distance* of at least equal biodiversity, community benefit and accessibility.

##### Scottish Natural Heritage (178/7)

- The Council does not accept the proposed modification to revise the open space requirements. The Council’s requirement in Schedule 4 of the Proposed Plan is intended to provide a more nuanced approach to calculating open space size by using habitable rooms to anticipate population. The formula of 10sq. m per habitable room has been calculated to provide an area of greenspace commensurate with the number of likely users. Paragraph 154 of PAN 65 (CD/@@) allows for the standards to be tailored to the local area, there is no requirement to be in line with the PAN 65. The Council does not accept the suggestion that Schedule 4 may lead to lesser provision. The Council does not accept the

suggestion to revert to the open space standards used in LDP1 which used sliding scale calculations based on the number of houses in a development. In practice this was a crude methodology that did not discern between developments of small flats or large detached houses.

- The Council does not propose to modify the Plan based upon the above.

#### Church of Scotland General Trustees (499/2)

- The Council recognises the proposal is largely located on the footprint of the existing manse and associated garden ground/open space. The proposal is for 8 mainstream family sized homes.
- The Council accepts that there is little public use of the site at present but contends that any future proposal on this site should satisfy the requirements of policy D5 and demonstrate no loss of biodiversity or landscape function and provide an appropriate level of mitigation. The Council agrees with the representee that the open space provides the landscape setting to the B Listed Kirk building. The objection states that the proposed development will improve views of the Kirk and enhance the setting of the listed building but does not provide evidence on how this will be achieved or what mitigation measures will be put in place in line with Policy D5.
- Matters relating to Housing Supply and Education Capacity are addressed further under Issue 13 and Issue 14 which clearly demonstrates that further housing releases would have major impacts upon the existing education infrastructure. The suitability of the site for housing is also addressed under Issue 24.
- The site given its protection as Urban Greenspace is therefore not supported by the Proposed Plan. Other more sustainable sites have been identified in the Plan to meet housing needs.
- The Proposed Plan promotes a compact strategy of consolidation and regeneration of the urban areas alongside a focus on protecting green spaces. The Proposed Plan seeks to protect, enhance and increase the amount and quality of greenspaces. This is clearly evidenced in Spatial Objective 1.4, Strategic Policy 1 and Policy D5. Development of this site would clearly be contrary to this key objective and the strategy of the Proposed Plan.
- It is recommended that this site continues to be allocated as Urban Greenspace under Policy D5.
- It is not proposed to modify the Plan based upon the above.

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**

<b>Issue 11</b>	<b>Natural Environment Features</b>	
<b>Development plan reference:</b>	Policy D7: Natural Environment Features	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Mr and Mrs Green (133/2)          Scottish Natural Heritage (178/8)          Broom, Kirkhill and Mearnskirk Community Council (255/1)          Woodland Trust Scotland (376/6)</p>		
<b>Provision of the development plan to which the issue relates:</b>	Section 3: Creating Sustainable Places and Communities Schedule 5: Natural Environment Policy D7.3: Local Biodiversity Sites Pages 66 to 67	
<b>Planning authority's summary of the representation(s):</b>		
<p><b><u>(a) Policy D7: Natural Environment Features</u></b></p> <p><b><u>Support</u></b></p> <p><u>Broom, Kirkhill and Mearnskirk Community Council (255/1)</u></p> <ul style="list-style-type: none"> <li>• Support for Policy D7.</li> </ul> <p><b><u>Objections</u></b></p> <p><u>Scottish Natural Heritage (178/8)</u></p> <ul style="list-style-type: none"> <li>• Clarification should be provided in relation to mitigation measures. A number of modifications to the text are suggested to provide this clarity.</li> <li>• The inclusion of woodland in this policy is welcomed. However, consideration could be given to the wildlife habitats to ensure the protection and enhancement of the habitat network. The policy could also give explicit protection for semi-natural woodland and Tree Preservation Orders.</li> <li>• Consider that Part 4 of this policy should be expanded to ensure that the findings from an ecological appraisal inform the mitigation measures.</li> </ul> <p><u>Woodland Trust Scotland (376/6)</u></p> <ul style="list-style-type: none"> <li>• Considered to be a strong policy wording, suggest it could be strengthened even further by a slight addition to the policy wording taken from the introductory text and inserted into the policy.</li> </ul> <p><b><u>(b) Schedule 5 - Proposal D7.3 Local Biodiversity Sites</u></b></p> <p><u>Mr and Mrs Green (133/2)</u></p>		



- Object to designation of woods and polices as of Fa'side house under D7.3 as a Local Biodiversity Site (LBS).
- The Council has not conducted the necessary site survey to determine the biodiversity value of the site.
- The Council has not discussed the designation with the landowner.
- The biodiversity site is now surrounded by large scale development which may have forced protected species to relocate.

### **Modifications sought by those submitting representations:**

#### **(a) Policy D7: Natural Environment Features**

##### Scottish Natural Heritage (178/8)

- Recommend inserting the following text into Part 1 of Policy D7: Natural Environment Features:  
“Adverse effects on species and habitats should be avoided with mitigation measures provided *wherever this is not possible*”.
- Recommend amending the following text in Part 2 of Policy D7: Natural Environment Features:  
“Development that affects a Site of Special Scientific Interest (SSSIs) will only be permitted where: a. The objectives of designation and the overall integrity of the area will not be compromised; or...”
- Recommend inserting the following text into Part 3a for Policy D7: Natural Environment Features (p. 66):  
“Any tree, group of trees or woodland that makes a significant positive contribution to the setting, amenity and character of the area has been incorporated into the development through design or layout *and, where possible, enhancing and contributing to the wildlife network...*”
- Recommend inserting the following text into the final paragraph of bullet Part 3 of Policy D7: Natural Environment Features:  
“The loss of Ancient *or semi-natural* woodland, *or trees covered by Tree Preservation Orders* will not be supported *unless there are overriding social, economic or environmental benefits that outweigh the loss of the woodland habitat*”.
- Recommend inserting the following text into part 4 of Policy D7: Natural Environment Features:  
“Where there is likely to be an adverse impact on natural features or biodiversity an ecological appraisal will be required. *This appraisal should identify measures adequate to mitigate any such impacts that are identified*”.

##### Woodland Trust Scotland (376/6)

- Insert the into part 4 of Policy D7 the following text:
- “Ancient woodland is an irreplaceable resource and should be protected from adverse impacts arising from development”

#### **(b) Schedule 5 - Proposal D7.3 Local Biodiversity Sites**

##### Mr and Mrs Green (133/2)

- Remove the D7.3: Local Biodiversity Site designation from Fa'side House and Woods and Quarry.

### Summary of responses (including reasons) by planning authority:

#### **(a) Policy D7: Natural Environment Features**

##### **Support**

##### Broom, Kirkhill and Mearnskirik Community Council (255/1)

- The Council acknowledges and welcomes the support for Policy D7.
- It is not proposed to modify the Plan based on the above.

##### **Objections**

##### Scottish Natural Heritage (178/8)

- The Council agrees with the suggested text and amendments proposed to Policy D7.
- If the Reporter is so minded to recommend that the representations from SNH is accepted and the Plan modified, as set out below, the Council would be supportive of these modifications.

Criterion 1 final sentence should be amended to read (revised text in italics):

Adverse effects on species and habitats should be avoided with mitigation measures provided *wherever this is not possible.*

Criterion 2 should be amended to delete the 'and' at the end of part a and replace with 'or' (revised text in italics):

2a. The objectives of designation and the overall integrity of the area will not be compromised; ~~and-or...~~

Criterion 4 Insert Additional Sentence (revised text in italics):

4. Where there is likely to be an adverse impact on natural features or biodiversity an ecological appraisal will be required. *This appraisal should identify measures adequate to mitigate any such impacts that are identified.*

- The Council does not agree that additional wording in relation to wildlife networks is required to be inserted to Criterion 3a. The retention of trees in development will secure these benefits and will contribute to wider wildlife networks, the additional text is therefore superfluous and is not required.
- It is not proposed to modify the Plan based on the above.

##### Scottish Natural Heritage (178/8), Woodland Trust Scotland (376/6)

- The Council does not fully agree with the modification proposed by SNH. The Council accepts the addition of the words or '*semi-natural woodland or trees covered by Tree Preservation Orders*' but believes that that the sentence regarding overriding 'social, economic or environmental benefits' weakens the policy and should not be inserted. The Council agrees that the suggested additional text requested by the Woodland Trust strengthens the policy.  
If the Reporter is so minded to recommend that the representation from SNH is partially accepted and the additional sentence from the Woodland Trust is accepted

and the Plan modified, as set out below, the Council would be supportive of this modification.

Criterion 3 Para 3 should be amended to read (revised text in italics):

*The loss of Ancient or semi-natural woodland, or trees covered by Tree Preservation Orders will not be supported. Ancient woodland is an irreplaceable resource and should be protected from adverse impacts arising from development.*

**(b) Schedule 5 - Proposal D7.3 Local Biodiversity Sites**

Mr and Mrs Green (133/2)

- The Council does not accept the modification. The Local Biodiversity Site (CD/@@) was surveyed by an ecologist in August 2012 and a site assessment produced. The survey found 2 locally uncommon plants. The Council undertook a review of the criteria required for designating LBS sites in 2013. Standard ecological methodologies were used to survey and score sites, Fa'side Woods met the requisite score of 12 to be automatically designated an LBS. The landowner was contacted in 2012 and stated that they wished their land to be protected by the designation. The adjacent housing development may increase habitat connectivity because new and extensive shelter belt screening will extend the area of woodland south and eastwards.
- It is not proposed to modify the Plan based on the above.

**Reporter's conclusions:**

**Reporter's recommendations:**

<b>Issue 12</b>	<b>Sustainable Transport Networks and Access</b>	
<b>Development plan reference:</b>	Policy D8: Sustainable Transport Networks Policy D9: Access Policy D11: Electric Charging Infrastructure	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Mr Forsyth (2/1)  SportScotland (7/6) (7/7)  Marian Stewart (8/1)  Katie Whyte (9/1)  Lauren Gilbert (11/1)  Sean McGowan (12/1)  Mrs S Crichton (14/1)  Charles Curran (23/1)  Stephen Thomson (39/1)  East Renfrewshire Sustrans volunteers (60/1) (60/2)  Allan Davidson (73/1)  Sylvia Johnston (105/1)  Andrew Shanks (114/1)  David Williamson (117/2) (117/3)  Morag Rough (118/1)  Anne Hind (120/1)  Alexander Newall (121/1)  Kathryn Hamilton (126/1)  Olivia Knight (127/1)  Alan McGinlay (129/1)  Lynn McGinlay (130/1)  Mr and Mrs Green (133/3)  GoBike (174/2) (174/6) (174/7)  R O'Brien (177/3)  Scottish Natural Heritage (178/9)  David Henderson (238/2)  Broom, Kirkhill and Mearnskirk Community Council (255/14)  Stephen Lockie (345/1)  Persimmon Homes (397/4)  Rolf Matthews (400/1)  Martin Lages (437/1)  Miller Homes (463/3)  Cala Homes (West) (464/4)  Mary MacCallum (468/2) (468/3)  Thomas Cornwallis (471/1) (471/5) (471/6) (471/7)  Network Rail (475/1)  Homes for Scotland (476/5)  Scottish Government (486/9)  Wallace Land Investments (489/5)  Robertson Homes (495/5)</p>		

Strathclyde Partnership for Transport (498/1) Avant Homes (504/4)	
<b>Provision of the development plan to which the issue relates:</b>	Section 3: Creating Sustainable Places and Communities. Sustainable Transport Network and Travel (Page68-75) Schedule 6: Sustainable Transport D8.1: Core Paths (Council Wide) D8.2: Rights of Way (Council Wide) D8.10: Busby Glen/Overlee Park D8.13: Netherlee to Giffnock Transport - Background Report
<b>Planning authority's summary of the representation(s):</b>	
<b><u>(a) Policy D8: Sustainable Transport Networks</u></b>	
<b><u>Support</u></b>	
<u>SportScotland (7/6)</u>	
<ul style="list-style-type: none"> <li>• Policy welcomed as it seeks to protect and improve spaces which provide opportunities to participate in sport, recreation and have responsible access.</li> </ul>	
<u>David Williamson (117/3)</u>	
<ul style="list-style-type: none"> <li>• Agree with emphasis on improving bus services to increase patronage and fully serve the areas covered by routes.</li> </ul>	
<u>Broom, Kirkhill and Mearnskirik Community Council (255/14)</u>	
<ul style="list-style-type: none"> <li>• Supports this policy and in particular that proposals will be required to prioritize improvements to public transport networks and infrastructure, including the need for enhancements to bus and rail infrastructure and services to maintain or increase patronage within the area.</li> </ul>	
<u>Network Rail (475/1)</u>	
<ul style="list-style-type: none"> <li>• Network Rail welcomes the Council's support towards investment in the strategic transport network as set out in Policy D8.</li> <li>• There are likely to be a number of rail enhancement projects within East Renfrewshire Council area arising from the East Kilbride/Barrhead Corridor Enhancement project. The project seeks to increase passenger capacity between East Kilbride-Glasgow-Barrhead and may involve a number of physical works to improve capacity. It is currently at options/design stage with work expected to start at some point during the current control period (CP6, 2019-2024).</li> </ul>	
<u>Strathclyde Partnership for Transport (498/1)</u>	

- SPT supports the content of the Proposed Plan and welcomes the focus on sustainable development patterns which will reduce the need to travel and encourage walking and cycling and public transport use.
- Look forward to continued partnership working with the Council towards the implementation of the LDP and community plan and in the development of the new regional transport strategy and the Council's new local transport strategy and active travel plan.

### **Objections**

#### East Renfrewshire Sustrans volunteers (60/1)

- Welcomes Policy D8 and associated (schedule 6).
- Welcomes renewed commitment to providing active travel and sustainable transport. Wording within LDP2 similar as that included within the (2015-Active Travel Plan).
- No progress or development to date in relation to cycling and proposed cycle corridors outlined in both (2015 – Active Travel Plan) and Proposed LDP2.
- Liaise with Glasgow City Council on commuter cycle routes

#### David Williamson (117/2)

- List of Strategic Cycle Corridors is as identified within the 'Active travel Plan 2015' with no progress to date. Eaglesham is a focal point for leisure cycling due to quiet roads in the East Kilbride and Kilmarnock directions. Route out to Eaglesham from Clarkston has heavy traffic and is not cycle friendly. A cycle lane along this route would encourage cycle use.

#### GoBike (174/2), Thomas Cornwallis (471/1)

- Support the mentions of active travel infrastructure and networks. Support the proposals for new active travel routes and safer streets alluded to throughout Schedule 6.
- Support updates to Active Travel Plan.
- Levels of active travel in East Renfrewshire are low - even lower than the Scottish average. Uptake is hindered by a lack of safe protected infrastructure (key determinant of whether or not people choose cycling as a means of transport) and the existing dominance of motor traffic in the area. This is the result of planning decisions which have consistently prioritised the needs of car users over other forms of transport.
- Reducing demand for car transport through better active travel provision will free up space on the roads for those who have no alternative but to drive, such as those with disabilities or other limitations.
- Concerned that the proposals indicate a focus on leisure at the expense of a modal shift towards walking and cycling as means of transport. Focus should be on major cycle commuting routes into Glasgow on the A77 and into the towns of East Renfrewshire. Such protected cycle lanes will not only allow people to get to their work without using the car but will encourage people to cycle into the local town for school, shopping or leisure trips. The plans for active travel routes to Dams to Darnley Country

Park, long-distance routes between Eaglesham and Darvel, and other rural connecting routes are to be welcomed, but are unlikely to achieve the levels of behaviour change that are aspired to elsewhere in the plan.

Scottish Natural Heritage (178/9)

- In order to ensure that development proposals connect to and enhance existing active travel networks, the Policy should clearly state the requirement to provide new connections where required as well as enhancing existing routes.

Miller Homes (463/3), Cala Homes (West) (464/4), Wallace Land Investments (489/5), Avant Homes (504/4)

- Policy has the potential to be unnecessarily burdensome on new development. Text relating to achieving a sustainable transport service needs to be capped in timescale or related to viability.

Mary MacCallum (468/3)

- Council should investigate potential for a new interchange station at Drumby Road where the two rail lines cross over. Parking facilities could be provided in the spare land instead of using it for housing.

Thomas Cornwallis (471/7)

- Need for segregated cycleways.
- Improvements needed to roundabouts – dangerous to cross.

Scottish Government (486/9)

- SPP paragraph 277 states “The strategic case for a new station should emerge from a complete and robust multimodal transport appraisal in line with “Scottish Transport Appraisal Guidance.”
- An appraisal in line with STAG is required when seeking Government funding, support or approval for options to change the transport system.

**(b) Proposal D8.1: Core Paths (Council Wide)**

David Henderson (238/2)

- Path from Huntly to Braidpark Drive and thereafter to Muirend Park should be identified as a core path.

**(c) Proposal D8.2: Rights of Way (Council Wide)**

Mr and Mrs Green (133/3)

- Comment on potential to reroute right of way if future proposals were to come forward.

**(d) Proposal Policy D8.10: Busby Glen/Overlee Park**

Alexander Newall (121/1)

- Supports path network, however the white cart cycle path extension at Monteith Drive and surrounding residential streets are incredibly narrow and steep, therefore a route along the waterfront might make more sense.

**(e) Proposal D8.13: Netherlee to Giffnock****Support**GoBike (174/6), Thomas Cornwallis (471/5)

- Support Proposal. It will provide greater connectivity between shopping and residential areas.

Mary MacCallum (468/2)

- Huntly Park would benefit from a footbridge across the railway line to allow access to/from Netherlee.

**Objections****Full list of representations set out in Appendix 1 with summarised key points set out below.**

Mr Forsyth (2/1), Katie Whyte (9/1), Lauren Gilbert (11/1), Sean McGowan (12/1), Mrs S Crichton (14/1), Charles Curran (23/1), Stephen Thomson (39/1), Allan Davidson (73/1), Sylvia Johnston (105/1), Andrew Shanks (114/1), Morag Rough (118/1), Anne Hind (120/1), Kathryn Hamilton (126/1), Olivia Knight (127/1), Alan McGinlay (129/1), Lynn McGinlay (130/1), Stephen Lockie (345/1), Rolf Matthews (400/1), Martin Lages (437/1)

- Proposed footbridge not required/wanted - costs outweigh the benefits.
- Council budgets should be more appropriately spent on other priorities.
- Sufficient alternative routes - access to Giffnock already reasonable (10 min) via access lane at bottom of Gordon Drive.
- Turn quiet dead-end into short-cut route with resultant increased traffic, congestion, car parking and pedestrians.
- Poor condition of Gordon Drive pavement will worsen with increased pedestrians.
- Limited benefit to cyclists and pedestrians.
- Bridge structure considered an eyesore against existing trees.
- Crossing would be a challenging construction, given height of railway line and utilities in vicinity.
- Overlooking/privacy issues.
- Seclusion of the area which would be changed and property devalued.
- Increased antisocial behaviour.
- Increased rubbish/dog litter/noise/light pollution.
- Has ownership interest (Katie Whyte (9/1)) in the vicinity of site, which would impact on implementation of project.



**(f) Policy D9: Access****Support****SportScotland (7/7)**

- Policy welcomed as it seeks to protect and improve spaces which provide opportunities to participate in sport, recreation and have responsible access.

**Objections****East Renfrewshire Sustrans volunteers (60/2)**

- Welcomes Policy D9 and renewed commitment to providing active travel and sustainable transport. Wording within LDP2 similar as that included within the (2015- Active Travel Plan).
- No progress or development to date in relation to cycling and proposed cycle corridors s outlined in both (2015 – Active Travel Plan) and Proposed LDP2.

**R O'Brien (177/3)**

- There is disproportionate focus on Whitelee, Dams to Darnley Country Park and Rouken Glen with the former two being almost entirely dependent on visitors using cars to access them. There needs to be more of a focus on local connectivity (and this also presents an opportunity for biodiversity enhancements). However, many smaller local parks are disconnected and largely neglected to safeguard potential future development opportunities.

**(g) Policy D11: Electric Charging Infrastructure****GoBike (174/7) Thomas Cornwallis (471/6)**

- It is arguable that the documents' proposals for electric car charging infrastructure are stronger and more specific than those for active travel infrastructure.

**Persimmon Homes (397/4)**

- The proposed policy is onerous and is not proportional to the demand for electric charging points.
- Agree that there is a need to provide adequate electric vehicle infrastructure within future developments. However, it is not necessary to provide complete charging points within every dwelling. Most households do not currently own an electric car, therefore if implemented would leave the majority of the charging points redundant.
- Suggest passive EV provision to future proof for potential EV installations especially when the technology is evolving and other technologies, such as hydrogen, are being explored. Passive provision generally means providing ducting between the fuse box and parking space whilst ensuring that the

fuse box has capacity for the connection and the appropriate switches to control use of the EV charging point, if installed. This approach would enable easy installation of electric charging points at a future date, or during the development process itself, should this be required. It also reduces the cost associated with the development (which would be passed onto the purchaser) and ensures that the homeowner has the choice alongside active travel and public travel options.

Homes for Scotland (476/5), Robertson Homes (495/5)

- Homes for Scotland supports the intent behind the policy. However, in its current form it would have a substantial impact upon the electricity grid which is outwith the control of site owners and even local authorities. Such a major change of policy requires joined up consideration of the impact on infrastructure. We consider that a national level solution is required. A degree of overprovision compared with current demand may be desirable to encourage increased use. However, requiring 100% provision is likely to result in the majority charging points not being used and potentially becoming obsolete with further advancements in technology.
- The Policy could instead explain that the Council will seek provision of EV charging where appropriate and explain that this would be covered by supplementary guidance. This guidance could then have regard to the NPF4 which is likely to set out a national policy response on reducing carbon emissions.

**(h) Transport - Background Report**

**Objections**

Marian Stewart (8/1)

- Generally transport background paper considered flawed and object to its use. Particular observations include:-
- Data source references considered outdated (e.g. 2014/14 train times)
- No account taken of train cancellations, overcrowding and disabled access onto trains.
- Patterton train station now has inadequate car parking spaces.
- % 10 min walking statistics do not illustrate fully the poor access availability from certain areas (e.g. south of Barrhead Rd. and Eaglesham Rd).
- To expect long walking distances to train stations is inappropriate and access in inclement weather can be problematic
- Bus services considered poor with few express buses, more bus services for travel out with Newton Mearns required.
- Local rds. Congested with high volumes of traffic
- Parking in new housing developments is very limited either within grounds of dwellings or on the road.
- Expectation is that the LDP2 addresses the issue outlined above.

**Modifications sought by those submitting representations:**

**(a) Policy D8: Sustainable Transport Networks****East Renfrewshire Sustrans volunteers (60/1)**

- Suggest including specific commitments such as Review off-road/ quiet routes and associated links to leisure areas such as Rouken Glen and Dams to Darnley.
- Encourage feasibility studies for establishing the 5 strategic cycle corridors.

**Scottish Natural Heritage (178/9)**

- Recommend inserting the following text into Policy D8: Sustainable Transport Networks:  
“...Proposals will be required to be accessible and permeable by foot and cycle, *providing new and enhanced links which connect to existing and proposed walking, cycling and green networks, as well as to public transport networks*”.

**Miller Homes (463/3), Cala Homes (West) (464/4), Wallace Land Investments (489/5), Avant Homes (504/4)**

- Proposals will be required to prioritise improvements to public transport networks and infrastructure, including the need for enhancements to bus and rail infrastructure and services to maintain or increase patronage within the area. Where public transport services are not currently available the Council will encourage applicants to work with transport providers to provide subsidised bus services *for maximum of three years. Should further time be required to achieve until a sustainable service is achievable, discussion should be held between the Council, transport providers and the applicant to identify agreed mitigation.*

**Mary MacCallum (468/3)**

- Include proposal for a new interchange station at Drumby Road.

**Scottish Government (486/9)**

- It is noted within the text on p68 under ‘Sustainable Transport Network and Active Travel’ that a rail halt at Barrhead South is mentioned as being a City Deal project. It is recommended the text on P68 Sustainable Transport Network and Active Travel is amended to read;  
*‘The City Deal infrastructure project will also assist with delivering a range of strategic transport improvements, including the potential for a new train station subject to the outcome of the Barrhead South Accessibility Appraisal, Sustainable Transport Network and Active Travel at the Barrhead South SDO and improvements in the road connections between Barrhead and Newton Mearns to improve access to jobs, services and to the Dams to Darnley Country Park.’*

**(b) Proposal D8.1: Core Paths (Council Wide)**

David Henderson (238/2)

- Path from Huntly to Braidpark Drive and thereafter to Muirend Park should be identified as a core path.

**(d) Proposal Policy D8.10: Busby Glen/Overlee Park**

Alexander Newall (121/1)

- Suggests an alternative core path route along the waterfront.

**(e) Proposal D8.13: Netherlee to Giffnock**

Mr Forsyth (2/1), Katie Whyte (9/1), Lauren Gilbert (11/1), Sean McGowan (12/1), Mrs S Crichton (14/1), Charles Curran (23/1), Stephen Thomson (39/1), Allan Davidson (73/1), Sylvia Johnston (105/1), Andrew Shanks (114/1), Morag Rough (118/1), Anne Hind (120/1), Kathryn Hamilton (126/1), Olivia Knight (127/1), Alan McGinlay (129/1), Lynn McGinlay (130/1), Stephen Lockie (345/1), Rolf Matthews (400/1), Martin Lages (437/1)

- Removal of proposal from Proposed Plan.

**(g) Policy D11: Electric Charging Infrastructure**

Persimmon Homes (397/4)

- Suggest policy should refer to passive EV provision to future proof for potential EV installations.

Homes for Scotland (476/5), Robertson Homes (495/5)

- Policy should only seek provision of EV charging where appropriate and should also include reference to further SPG on this subject.

**Summary of responses (including reasons) by planning authority:**

**(a) Policy D8: Sustainable Transport Networks**

**Support**

SportScotland (7/6), David Williamson (117/3), Broom, Kirkhill and Mearnskir Community Council (255/14), Thomas Cornwallis (471/1), Network Rail (475/1), Strathclyde Partnership for Transport 498/1

- The Council acknowledges and welcomes the support for Policy D8.
- It is not proposed to modify the Plan based upon the above.

**Objections**

East Renfrewshire Sustrans volunteers (60/1), David Williamson (117/2), Thomas Cornwallis (471/7)

- The Council welcomes the renewed support for providing active travel and sustainable transport. It is acknowledged that cycling and proposed strategic cycle corridors, as outlined in the Active Travel Plan (2015) (CD/@@) and as also shown within the Proposed Plan, have not progressed significantly to date.
- The Council appreciates that the lack of progress of this element of the Active Travel plan can frustrate and discourage. The Strategic cycle corridors as depicted both in the Active Travel Plan and Proposed Plan, have been established through a robust process.
- Eaglesham is recognised within the Active Travel Plan as an active travel hub. It is considered inappropriate to identify detailed components of the active travel plan in the LDP, this detail is appropriately contained within the active travel Plan. Within the Active Travel Plan it is recognised that the cycle network would primarily be segregated from carriageways.
- The merit in comprehensively showing all the strategic cycle corridors within the Proposed Plan, is that it shows the potential Strategic Cycle Corridors as a connected network. It is therefore considered inappropriate to separate out strategic cycle corridors or projects.
- The Council agrees that further feasibility studies, in partnership with other relevant organisations including adjoining Councils and funding partners, would be beneficial to progress the 5 strategic cycle corridors. Further elements of these studies could include commuter cycle routes, review of off-road quiet routes and associated links with leisure areas at Rouken glen and Dams to Darnley.
- It is also viewed that a revised Local Transport Strategy and Active travel plan will play an important part in helping achieve a sustainable transport network.
- The Council acknowledges the comment highlighting the hazard that roundabouts present to cyclists. The creation of safe roundabouts is a detailed design process that will be considered at project level, and as such falls out with the scope of the LDP2. It is more appropriate to deal with this matter through the Schedule 6 projects that will investigate improvements at roundabouts. The relevant studies as outlined in the Active Travel Plan (2015) are Corridor B: Giffnock to Newton Mearns and Strategic Cycle Corridor C: Netherlee to Eaglesham.
- It is not proposed to modify the plan based upon the above.

GoBike (174/2), Thomas Cornwallis (471/1)

- Policy D8 and its associated 'sustainable transport and access projects' cover a range of projects including, core paths, Rights of Way's, Strategic cycle corridors, Levern walkway route, access enhancements, new path links to serve Dams to Darnley Country Park and Waulkmill Glen.
- It is acknowledged that a number of these projects are related to particular leisure elements (attractions). These can play an important role in encouraging modal shift towards walking cycling and prompting behavioural change.
- The proposals/projects set out in Schedule 6 will assist with facilitating a modal shift whilst reducing carbon emissions. It is also viewed that a revised Local Transport Strategy and Active travel plan will play an important part in helping achieve a sustainable transport network.

- It is not proposed to modify the plan based upon the above.

#### Scottish Natural Heritage (178/9)

- The Proposed Plan aims to prioritise active travel and the need to demonstrate a clear sustainable movement hierarchy. Consequently the Council agrees with the suggested text, to insert reference to providing new and enhanced links which connects to both existing and proposed networks.
- If the Reporter is so minded to recommend that the representation from SNH is accepted and the Plan modified, as set out below, the Council would be supportive of these modifications because they would strengthen the policy.
- The third paragraph second sentence of the policy be amended to read (revised text italics):  
Proposals will be required to be accessible and permeable by foot and cycle, providing new and enhanced links and which connect to existing and proposed walking, cycling and green networks, as well as to public transport networks.

#### Miller Homes (463/3), Cala Homes (West) (464/4), Wallace Land Investments (489/5), Avant Homes (504/4)

- The fourth paragraph of Policy D8, gives sufficient flexibility in enabling applicants to work with transport providers to provide subsidised public transport services, in accordance with Para 276 of Scottish Planning Policy (SPP) (CD/@@). To impose a time limitation, for such services, would be considered both cumbersome and inappropriate.
- It is not proposed to modify the Plan based upon the above.

#### Mary MacCallum (468/3)

- The Council acknowledges the concept of creating a new rail interchange station at Drumby Road where the 2 rail lines cross. However, such a proposal would have go through a detailed (STAG) process as a justification for such a significant transportation project. As this has not been undertaken the Council is not supportive of including reference to this proposal in the Proposed Plan.
- It is not proposed to modify the Plan based upon the above.

#### Allen Hughes, Scottish Government (486/9)

- The rail halt at Barrhead South is being promoted in line with the STAG requirement as outlined within Para 277 of SPP, however the Council agrees that adherence to this process was not made explicit within the corresponding introductory text to the Sustainable Transport Network section.
- The Council agrees with the suggested amendment. If the reporter is so minded to recommend that the representation from Scottish Government is accepted and the Plan modified, as set out below, the Council would be supportive of these modifications because it would make the requirement to go through the STAG process, clear and explicit within the introductory

text and as according to SPP (para 277). This modification would also ensure consistency with other modifications proposed under Issue 3 and Issue 5 on this same matter.

- The 2<sup>nd</sup> sentence of the fourth paragraph within the introductory text under 'Sustainable Transport Network and Active Travel' (page 68) be amended as follows (revised text in italics):

The City Deal infrastructure project will also assist with delivering a range of strategic transport improvements, including *the potential for a new train station subject to the outcome of the Barrhead South Accessibility Appraisal, Sustainable Transport Network and Active Travel* at the Barrhead South SDO and improvements in the road connections between Barrhead and Newton Mearns to improve access to jobs, services and to the Dams to Darnley Country Park.

### **(b) Proposal D8.1: Core Paths (Council Wide)**

#### **Objections**

David Henderson (238/2)

- The core paths as shown on the Proposed Plan proposals map are taken directly from the Core Paths Plan (2012) (CD/@@) which was competed and approved by Council in accordance with the Land Reform Act (2003).
- The Council notes the request to incorporate the path from Huntly to Braidbar into the Core Path Plan. The LDP process cannot add a path to the Core Paths Plan but the Council will be undertaking a review of the Core Paths Plan and the Braidbar path will be considered for core path adoption during this process. Further information is set out under Issue 6.
- It is not proposed to modify the Plan based upon the above.

### **(c) Proposal D8.2: Rights of Way (Council Wide)**

#### **Objections**

Mr and Mrs Green (133/3)

- The representation was seeking to reroute the right of way (between Landrig Rd and Faside Lodge), in light of prospective development proposals in the vicinity of the old quarry.
- Currently there is no justification or requirement to change the right of way route as depicted on the Proposed Plan proposals map. It is considered that this would be an item for consideration, during the normal development management process, in the event development proposals are submitted. It is also acknowledged that there is provision within the Countryside (Scotland) Act 1967 to reroute a right of way if it was considered appropriate.
- It is not proposed to modify the Plan based upon the above.

### **(d) Proposal D8.10: Busby Glen/Overlee Park**

Alexander Newall (121/1)

- The Council acknowledge and welcome the support for the core path network.
- The representation is seeking the reroute of the Core Path in the vicinity of the White Cart River.
- The core paths as shown on the Proposed Plan proposals map are taken directly from the Core Paths Plan (2012) which was completed and approved by Council in accordance with the Land Reform Act (2003).
- Whilst it is acknowledged that the route for the Core Path in the vicinity of Monteith Drive and surrounding streets is both narrow and less attractive than a waterfront option, at the time the core path routes were established it was considered that the most practical route was through the street/pavement in the vicinity. The terrain at that point in the vicinity of White Cart River is particularly challenging, with inaccessible steep rocky outcrops, bordering the river side. Therefore continuation of the route along the riverside at this location was considered both impractical physically and prohibitive financially.
- The LDP process cannot add a path to the Core Paths Plan but the Council will be undertaking a review of the Core Paths Plan and the Busby Glen path will be considered for core path adoption during this process.
- It is not proposed to modify the Plan based upon the above.

#### **(e) Proposal D8.13: Netherlee to Giffnock**

##### **Support**

GoBike (174/6) Thomas Cornwallis (471/5), Mary MacCallum (468/2)

- The Council acknowledge and welcome the support for the project.
- It is not proposed to modify the plan based upon the above.

##### **Objections**

Mr Forsyth (2/1), Katie Whyte (9/1), Lauren Gilbert (11/1), Sean McGowan (12/1), Mrs S Crichton (14/1), Charles Curran (23/1), Stephen Thomson (39/1), Allan Davidson (73/1), Sylvia Johnston (105/1), Andrew Shanks (114/1), Morag Rough (118/1), Anne hind (120/1), Kathryn Hamilton (126/1), Olivia Knight (127/1), Alan McGinlay (129/1), Lynn McGinlay (130/1), Stephen Lockie (345/1), Rolf Matthews (400/1), Martin Lages (437/1)

- A significant number of objections were received seeking the removal of this proposal from the Proposed Plan. 3 supporting comments were also submitted which acknowledged the benefits to cyclists and pedestrians.
- Currently there is no direct practicable pedestrian or cycle access route between Netherlee and Giffnock. Severance by the railway line currently means there is approximately a 2 mile journey between these areas.
- The use of a symbol on the Proposed Plan proposals map indicates that there is neither a precise location nor an exact specification for this project. It is anticipated that any potential feasibility study for a pedestrian and cyclist crossing would highlight a general corridor, within which an improvement to the linkages could be achieved.
- It is also anticipated that any potential feasibility study would be externally financed and undertaken and would include a comprehensive SWOT



analysis of the range of potential solutions. It is considered premature to remove the principle of this project at this early concept stage, until a robust feasibility study can explore the logistics of the project.

- It is not proposed to modify the plan based upon the above.

#### **(f) Policy D9: Access**

##### **Support**

Gillian Kyle, SportScotland (7/7)

- The Council acknowledges and welcomes the support for Policy D9.
- It is not proposed to modify the Plan based upon the above.

##### **Objections**

East Renfrewshire Sustrans volunteers (60/2), R O'Brien (177/3)

- The Council welcome the renewed support for providing active travel and sustainable transport. Acknowledge that cycling and proposed strategic cycle corridors, as outlined in the Active Travel Plan and as also shown within the Proposed Plan, have not progressed significantly to date.
- The Council appreciates that the lack of progress of this element of the Active Travel plan can frustrate and discourage. The Strategic cycle corridors as depicted both in the Active Travel Plan and Proposed Plan, have been established through a robust process.
- The merit in comprehensively showing all the strategic cycle corridors within the Proposed Plan, is that it shows the potential Strategic Cycle Corridors as a connected network. It is therefore considered inappropriate to separate out strategic cycle corridors or projects.
- The Council agrees that further feasibility studies, in partnership with other relevant organisations including adjoining Councils and funding partners, would be beneficial to progress the 5 strategic cycle corridors. Further elements of these studies could include commuter cycle routes, review of off-road quiet routes and associated links with leisure areas at Rouken glen and Dams to Darnley.
- It is also viewed that a revised Local Transport Strategy and Active travel plan will play an important part in helping achieve a sustainable transport network.
- Access and bio-diversity are key components of Policy D4. Connections and stepping stones between smaller park areas are concepts which have been embraced through existing and future provision of the green network.
- It is not proposed to modify the plan based upon the above.

#### **(g) Policy D11: Electric Charging Infrastructure**

GoBike (174/7), Persimmon Homes (397/4), Thomas Cornwallis (471/6), Homes for Scotland (476/5), Robertson Homes (495/5)

- A key aim of the Proposed Plan is to deliver a low carbon future for East Renfrewshire. This is emphasised within Spatial Objective 3, Strategic

Policy 1 and Policies E1 and E2. The Proposed Plan also seeks to accord with Climate Change (Emissions Reduction Targets) (Scotland) Act 2019.

- Para 289 of SPP is clear that electric vehicle charge points should always be considered as part of any new development.
- The Council believes that the requirement for major proposals to incorporate electric charging is both proportionate and in accordance with legislation to achieve major carbon reduction commitments.
- The Council is of the view that the Proposed Plan aims to achieve Climate Change Reduction targets through a variety of methods. The strong support for active travel is clearly documented in the Proposed Plan and above. However, it is also acknowledged that whilst electric car charging infrastructure will contribute in decarbonising transport, it will have a limited role in prompting significant modal shift away from the private motor vehicle.
- It is not proposed to modify the Plan based upon the above.

#### **(h) Transport - Background Report**

##### **Marian Stewart (8/1)**

- It is considered that the background report provides a strong overview of the existing transport network within East Renfrewshire. This document accompanies but does not form part of the Proposed Plan or this Examination. However, to ensure all matters are addressed the points raised have been acknowledged and responded to.
- A full and robust account of transport matters was taken into account in preparing the Proposed LDP2. The Council undertook a proportionate appraisal based on the proposed level, location and scale of development and transport information known. Neither Transport Scotland, SPT nor Network Rail have queried the integrity or robustness of the background report at MIR or Proposed Plan stages.
- The detailed expectations for the background report, as outlined by the representee, would not be expected to be included as part of the LDP2 process. A revised Local Transport Strategy (LTS) and active travel plan will consider these matters in more detail.
- It is not proposed to modify the Transport Background Report based upon the above.

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**

<b>Issue 13</b>	Community and Education Facilities and Infrastructure	
<b>Development plan reference:</b>	Policy D12: Community and Education Facilities and Infrastructure	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>SportScotland (7/8)  Alexander Newall (121/4)  East Renfrewshire Council Education Department (170/1)  R O'Brien (177/2)  Olawale Olafare (235/1)  Theatres Trust (245/1) (245/2)  Broom, Kirkhill and Mearnskirk Community Council (255/15)  Eastwood High School Parent Council (409/1)  Miller Homes (463/9)  CALA Homes (West) and Lynch Homes (467/4)  Homes for Scotland (476/4)  Stewart Milne (487/3) (488/3)  Wallace Land Investments (489/9)  SEPA (492/1)  NHS Greater Glasgow (500/3) (500/4)  Avant Homes (504/9)  Lynch Homes (505/5)  Mactaggart &amp; Mickel (507/4)  Barratt Homes West (511/4)  Gladman Developments Ltd (571/3)</p>		
<b>Provision of the development plan to which the issue relates:</b>	<p>Section 3: Creating Sustainable Places and Communities  Community Facilities and Infrastructure  Education Infrastructure  Education Background Report (BR4)  Schedule 8: Community Facilities  D12.9: Overlee Park, Netherlee  Schedule 9: Education Facilities  D12.17: Neilston Primary School, Neilston</p>	
<b>Planning authority's summary of the representation(s):</b>		
<p><b><u>(a) Policy D12: Community and Education Facilities and Infrastructure</u></b></p> <p><b><u>Support</u></b></p> <p><u>SportScotland (7/8)</u></p> <ul style="list-style-type: none"> <li>• Policy welcomed as it seeks to protect and improve spaces which provide opportunities to participate in sport, recreation and have responsible access.</li> </ul> <p><u>East Renfrewshire Council Education Department (170/1)</u></p>		

- Support for consolidation and regeneration principle.
- Support for document: BR4 Education Background Report.
- Support for methodology in BR4 to determine anticipated pupil numbers.
- Support for no additional new housing in LDP2.
- Support for principle of promoting walking and cycling to school.
- Education Department will continue to monitor demographic trends and pupil product ratios.

#### Theatres Trust (245/1)

- Supportive of Policy D12 which supports and protects community and education facilities.

#### Broom, Kirkhill and Mearnskirk Community Council (255/15)

- Concurs with the concepts expressed on page 77-78 of LDP2 for enhanced Education Infrastructure, Schedule 8 on page 81, and Schedule 9 on page 83.
- Note the development of nurseries and family centres.
- Concerned that no mention is made of sites for two new primary and one secondary school required within the area by 2029.

#### NHS Greater Glasgow (500/3)

- Support policy.

#### **Objections**

#### R O'Brien (177/2)

- The Council must not repeat the planning failures that led to there being no safe direct pedestrian access to East Renfrewshire's newest primary school (Maidenhill Primary School) in 2019. Policy D12, in relation to new schools, must be upheld and implemented.

#### Olawale Olafare (235/1)

- Need for affordable indoor tennis facilities. This is essential to continue to improve the health and wellbeing of the children and adults in the community.
- Alternatively, the council can expand and turn the outdoor tennis courts at Rouken Glen Park to an indoor facility that can then better serve the community.

#### Theatres Trust (245/2)

- Policy should also make clear it applies to cultural facilities.

#### Eastwood High School Parent Council (409/1)

- Concerns over impact LDP2 on school community.
- Concerns about number of housing units planned and effect on school capacity.
- Eastwood high almost at full capacity.

- Extension at Crookfur Primary will also directly affect Eastwood High and impact on space in the school etc.
- Concerns no spare capacity to deal with increase in school age population within existing stock.
- Queried contingency plans within school estate especially to deal with unforeseen events.

#### Miller Homes (463/9), Avant Homes (504/9)

- The Education note submitted with the representation concludes that education capacity is not an insurmountable constraint to developing the site for housing at this location and that there are no capacity constraints in the Levern Valley sub area as evidenced by the Education background Report (BR4). The report also concludes that:
  - There is capacity available at Hillview Primary School, Barrhead High School and St Luke's High School.
  - An extension would be required at St Mark's Primary School (sufficient space available) which Miller homes would be prepared to make a financial contribution. The Council could also undertake a catchment review to utilise available pupil places in the neighbouring St John's and St Thomas's Primary Schools.

#### CALA Homes (West) and Lynch Homes (467/4)

- With regards to the need to provide additional education infrastructure, the Council's Background Report on Education (BR4) lacks any real detail on whether it has appraised its existing stock of education facilities to review whether potential exists to accommodate growth within existing sites.
- The solution must not just be about providing new schools, but looking at whether existing schools can be extended, or reconfigured to create additional capacity. If such a study were undertaken this could potentially identify less expensive and time consuming solutions which could be put in place sooner. The Council also has the mechanism to undertake catchment area reviews to help manage capacity constraints, however it remains unclear to what extent this has been considered by the Council.

#### Homes for Scotland (476/4) Stewart Milne (487/3) (488/3), Mactaggart & Mickel (507/4)

- Report submitted by Geddes Consulting on behalf of Homes for Scotland. Report reviews the evidence base of the Proposed Plan and the Education Background report (BR4). It highlights gaps in the information provided and suggests a potential series of steps to fully understand and address any issues.
- Grateful to officers for meeting to discuss education matters at a high level prior to the publication of the Proposed LDP.
- At present the information within BR4 and further information subsequently provided is not a sufficiently robust evidence base from which to properly plan for solutions and important information remains outstanding.
- Lack of robust evidence presented in the BR4 to justify the Council's position that education capacity is an absolute constraint to allocating new housing sites as part of Proposed LDP 2.
- Considers that insufficient explanation about the information and appraisals have been provided by the Council.

- Information request submitted on 22nd November 2019 - partial response provided by the Council on 6th December 2019. However, the withholding of some information has restricted the necessary in-depth consideration of the Education Background Report.
- Object that the Council does not publish school catchment areas online.
- Analysis highlights that:
  - There are no significant education capacity constraints in the Levern Valley sub-area within East Renfrewshire in any sector.
  - There is existing education capacity in East Renfrewshire to accommodate additional pupils from LDP1 and MIR sites – though capacity in the primary sector is more limited than the secondary sector.
  - Requirement to provide a 4 hectare school site is significantly in excess of the legislative requirements. Based on the approach of other local authorities, a 2 hectare school site would easily accommodate a two stream school (capacity for 420 pupils plus), with room for future expansion.
- Mix of solutions which can be adopted:
  - No evidence to demonstrate that the Council have investigated utilising catchment area reviews. Scope to redefine the Eastwood High catchment area to allow for the utilisation of spare capacity at Barrhead High School and to free up secondary capacity for the Eastwood sub-area. The opening of the Maidenhill and consequential school catchment review will help alleviate capacity pressures at Kirkhill and Mearns Primary Schools;
  - Pro-actively manage out-of-catchment placing requests to help free up capacity in its school estate to accommodate more pupils resident in East Renfrewshire;
  - Consider the suitability of extending its existing schools;
  - Consider whether existing schools can be re-configured to provide additional capacity; and /or
  - Financial contributions through planning obligations.
- Council should provide:
  - Evidence to justify PPRs, which are significantly higher than many other Local Authorities;
  - Explain the detailed methodology used in the school roll projections which measure the impact of pupils from new housing development;
  - Provide detailed information on the level of additional education capacity required and ability for existing schools to accommodate expansion; and
  - Consider sites for new primary and secondary schools.
- Council should undertake a further technical appraisal of its education infrastructure. Once this is completed, a further consultation exercise about the availability of education infrastructure needs to be carried out.

#### Wallace Land Investments (489/9)

- Note the commentary on education infrastructure at pages 78 and 79.
- Development of the site at Floors Farm, Waterfoot will provide an opportunity to alleviate school capacity pressures in the wider area, through the provision of a 4ha (10 acre) site for a new primary school/community hub.

#### NHS Greater Glasgow (500/4)

- Policy could elaborate on the requirement to promote the incorporation of community facilities including healthcare as part of new developments.

Lynch Homes (505/5)

- It is not considered that education capacity is an insurmountable barrier to allocating new housing sites as part of the emerging LDP2. The Council will require to make additional housing allocations as part of a Modified Proposed Plan or at LDP Examination in order to provide a generous housing land supply for the period of the emerging LDP2.

Mactaggart & Mickel (507/4)

- No Education constraint affecting Uplawmoor.

Barratt Homes West (511/4)

- Supports the Homes for Scotland conclusion that there may be more capacity in the school roll than the LDP2 suggests. There is existing capacity in all 4 schools serving Neilston, which would allow for more housing. Also scope for the Eastwood High catchment to be redrawn and for non-denominational pupils to be redirected to Barrhead High.

Gladman Developments Ltd (571/3)

- The Council has proposed not to allocate any new sites for housing to avoid exacerbating the education issue.
- This is not an acceptable or sustainable position to take towards education or housing however, and an appropriate solution to education provision and new housing must be identified within LDP2. As the Council has no land available to address the education issue, the Council must identify suitable sites under private ownership that can be utilised to accommodate a new school within the Eastwood area.
- The proposed site at Glasgow Road, Waterfoot (CS039) represents a site that is of a sufficient scale and within an appropriate and sustainable location, to deliver a new primary school that meets the Council's requirements for a new school, housing and a neighbourhood centre to address this issue. A new primary school at this location would provide sufficient capacity to alleviate existing education pressures within the catchment area, as well as enabling the delivery of new homes.

**(b) Schedule 8: Community Facilities - Proposal D12.9: Overlee Park, Netherlee**Alexander Newall (121/4)

- Content with the nursery proposal at Overlee Park (D12.9) but against any further development in the Park.

**(c) Schedule 9: Education Facilities - Proposal D12.17: Neilston Primary School, Neilston**SEPA (492/1)

- A surface water flood hazard has been identified and should be discussed with the flood risk management authority and Scottish Water. Appropriate surface water management measures should be adopted.

#### **Modifications sought by those submitting representations:**

##### **(a) Policy D12: Community and Education Facilities and Infrastructure**

###### Theatres Trust (245/2)

- Recommend including the following text in Policy D12 as follows: The Council will support the protection and enhancement of existing community, *cultural*, leisure, health, sports and education facilities.

Miller Homes (463/9), CALA Homes (West) and Lynch Homes (467/4), Homes for Scotland (476/4), Stewart Milne (487/3) (488/3), Wallace Land Investments (489/9), Avant Homes (504/9), Lynch Homes (505/5), Mactaggart & Mickel (507/4), Barratt Homes West (511/4), Gladman Developments Ltd (571/3)

- The Council should undertake a further technical appraisal of its education infrastructure, taking into account the observations and commentary provided in the Geddes Report.

##### **(c) D12.17: Neilston Primary School, Neilston**

###### SEPA (492/1)

- Appropriate surface water management measures should be adopted and reflected in LDP2.

#### **Summary of responses (including reasons) by planning authority:**

##### **(a) Policy D12: Community and Education Facilities and Infrastructure**

###### **Support**

SportScotland (7/8), East Renfrewshire Council Education Department (170/1), Theatres Trust (245/1), Broom, Kirkhill and Mearns Kirk Community Council (255/15), NHS Greater Glasgow (500/3)

- The Council acknowledges and welcomes the support for Policy D12 and the focus upon protecting community and education facilities and the supporting comments in relation to the strategy of the Proposed Plan.
- It is not proposed to modify the Plan based upon the above.

###### **Objections**

###### R O'Brien (177/2)

- Active travel is recognised as a core component of the Development Strategy. Strategic Policy 1, Policy D1, D8, D9 and D12 all have a strong focus upon the



enhancement, extension and creation of new integrated walking and cycling routes and networks. The 3<sup>rd</sup> Para of Policy D12 specifically addresses the requirement for proposals to link to existing active travel networks and create new safe and healthy routes. This requirement is further evidenced in the 7<sup>th</sup> Para under 'Sustainable Transport Network and Active Travel' section (page 68). The Proposed Plan aims to ensure that master plans and other proposals demonstrate that safe pedestrian and cycle access is provided and considered at the outset of the design process.

- The Council maintains that the Proposed Plan strongly recognises the importance of active travel and provision of networks to.
- It is not proposed to modify the Plan based upon the above.

#### Olawale Olafare (235/1)

- The Proposed Plan recognises that community, leisure and sports facilities are an important element in creating sustainable healthy communities. Across the Council area there are a range of facilities, sports grounds and clubs which provide leisure and recreational opportunities, including for tennis. A Sport and Physical Activity Strategy is being prepared by the Culture and Leisure Trust and the Council will ensure that future LDPs closely align with the outcomes of this strategy.
- It is not proposed to modify the Plan based upon the above.

#### Theatres Trust (245/2)

- The Council agrees with the amendment proposed. If the Reporter is so minded to recommend that the representation from the Theatres Trust is accepted and the Plan modified, as set out below, the Council would be supportive of this modification.
- Insert the following text in relation to Para 1 of Policy D12 (revised text in italics):
  - The Council will support the protection and enhancement of existing community, *cultural*, leisure, health, sports and education facilities.

#### NHS Greater Glasgow (500/4)

- The Proposed Plan aims to ensure that health and well-being are recognised as a core component of the Development Strategy. Health facilities and healthy lifestyles are strongly referenced in Spatial Objectives 1.1 and 1.6.
- Following receipt of comments from NHS Greater Glasgow and East Renfrewshire HSCP and the letter received from the Cabinet Secretary for Health and Sport and Minister for Local Government, Housing and Planning, the Council are committed to carrying out future analysis with our community planning partners to consider the capacity required to support future demand for healthcare infrastructure. This is outlined further under Issue 3 and clearly stated within Strategic Policy 2: 'Development Contributions'.
- The Proposed Plan seeks to provide new health facilities to meet future needs and ensure new facilities are integrated and accessible to local communities through Strategic Policy 2 and Policy D12.
- The Council maintains that the Proposed Plan strongly recognises the importance of health and well-being.
- It is not proposed to modify the Plan based upon the above.

## **Education**

Eastwood High School Parent Council (409/1), Miller Homes (463/9), CALA Homes (West) and Lynch Homes (467/4), Homes for Scotland (476/4), Stewart Milne (487/3) (488/3), Wallace Land Investments (489/9), Avant Homes (504/9), Lynch Homes (505/5), Mactaggart & Mickel (507/4), Barratt Homes West (511/4), Gladman Developments Ltd (571/3)

The Council's response to the representations received to this issue are broken down into the following subheadings: General; Current Education Provision; Pupil Product Ratios (PPRs); Placing Requests; Online Catchments; Development Strategy and Education Mitigation; and the Lavern Valley Sub-Area.

### **General**

- Geddes Consulting, on behalf of Homes for Scotland (HFS), objected to the Council's overall position; justification for the Proposed Plan's Development Strategy; and approach to current and future education provision and mitigation. This representation was endorsed by a number of other representees. Comments were also submitted by Eastwood High School Parent Council (409/1) which are addressed in the points below.
- In preparing the Proposed Plan considerable detailed research and analysis was undertaken to inform long term planning of educational infrastructure and identify educational needs of current and future residents.
- Detailed reports and background information on current and future Education provision within the Authority are set out in the Education Background Report (BR4) (CD/@@) and other supporting Council Reports (December 2017, October 2018 and June 2019 (CD/@@) and the Development Contributions SPG (CD/@@) and its Education Addendum (2019) (CD/@@).
- Reports have been taken to the Education Committee of East Renfrewshire which reference the measures that the Education Department has undertaken to seek to manage places for the resident population in oversubscribed schools. A number of the Council's schools have high occupancy levels. The Council paper 'Planning for the Future of East Renfrewshire' (10 December 2019) (CD/@@) includes this information.
- A combination of measures have provided sufficient places for residents to date taking account of residential development and demographic changes; however as evidenced, in for example the Education Background Report (BR4) further new housing releases through the LDP2 MIR (CD/@@) sites would have a significant impact on the education estate and in particular within the Eastwood area of the authority.
- Justification for the Development Strategy of the Proposed Plan is demonstrated under Issue 2 (Development Strategy). The Council's approach to housing supply is addressed under Issue 14 (Housing Supply, Delivery and Phasing).
- The Geddes Report (Para 1.4 and 1.6) states that the timescales given for the Proposed Plan consultation restricted the period in which it was possible to examine the Proposed Plan and Background Reports. The consultation period for the Proposed Plan was 8 weeks, 2 weeks longer than the statutory minimum. The consultation undertaken is explained further under Issue 1 and within the Statement of Conformity (CD/@@). Furthermore, Geddes Consulting only submitted a Freedom of Information (FOI) request on 22nd November 2019 (5 weeks into the consultation period). The Education Department responded swiftly to the FOI on

the 6<sup>th</sup> December (well within the FOI statutory timescale (and 20<sup>th</sup> December 2019 deadline) (CD/@@)). It is noted that no further clarification or information requests were sought following release of this information.

- The Council is strongly of the view that the Geddes Report contains a number of incorrect calculations, assumptions and subsequent conclusions and on this basis the Council has serious concerns over the accuracy and conclusions reached within the report.

### **Current Education Provision**

- The Geddes Report (Paras 4.12 to 4.21) queries the approach taken by the Council in calculating primary and secondary school capacities.
- 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, as described in the FOI response to Geddes Consulting.
- Experience has identified that pupils typically tend to move in to a school's catchment area at key transition stages namely for a place in P1 and S1; however it is recognised there is some more limited movement in to other stages in response to family circumstances.
- There are varying class size maxima for the number of pupils a teacher can teach as a class group and there are other factors that influence the capacity such as; the physical size of the classroom/teaching space, provision of adequate general purpose spaces in primary and whether the subject is practical (e.g. science) or classroom based (e.g. mathematics) in secondary.
- In primary schools, the planning capacity is used to determine the number of pupils that East Renfrewshire can plan to take at all stages (P1 to P7) in the school, based on a class size of 30 pupils in all classrooms, including a planned P1-intake of 30. It is East Renfrewshire's experience that a planning capacity based on 30 eases progression through the school and is an efficient and effective use of resources from the outset. It is noted that from P4 onwards up to 33 pupils can be accepted at each stage and the maximum P1 class size (and all composite/mixed stage classes) is 25 in terms of pupil to teacher ratio and this is clear in the documentation and in looking at the actual number of pupils in P4 to P7 classes. For completeness, Uplawmoor Primary School is a small rural school with 4 classrooms where the intake is managed in half-class sizes and the classification is based on composite classes where the maximum pupil to teacher ratio is 25:1.
- In secondary schools, the planning capacity is the maximum number of pupil places available, which guarantees that all pupils attending the school will be able to access a wide range of curricular opportunities. In determining the planning capacity, a maximum S1-intake is defined which ensures all pupils in the cohort progress with curricular access through to S6. To do this a secondary school requires an extensive range of specialist accommodation and equipment such as science laboratories, art rooms etc.; and to allow pupils to access the required specialist accommodation, involves complex timetabling arrangements. To meet curricular demand, not least the subject option choices made by young people, and facilitate the smooth running of a secondary 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. East Renfrewshire secondary schools have

exceptionally efficient timetabling to ensure that there is the most effective use of all resources including maximum room utilisation. The approach adopted for the calculation of planning capacity for secondary schools is based on that used by the former Strathclyde region.

- In primary and secondary, the planning capacity is used to help monitor provision and demand (with planning capacity as the maximum number that the authority considers when planning for 'catchment demand' in the context of current arranged provision i.e. available places and arrangements for admissions/transfers). In cases where 'catchment demand' exceeds a school's planned P1/S1-intake, the numbers can be greater, provided additional measures are taken such as ensuring the pupil: teacher ratio teaching class size limit is maintained and there is sufficient physical space (classrooms, facilities, toilet numbers etc.). East Renfrewshire would only rely on such measures to accommodate high spikes in a school's 'catchment demand' or as an interim measure until a permanent solution is adopted (in cases where there is sustained evidence that 'catchment demand' is clearly increasing).
- Local authorities, as the education authority, have a duty to provide adequate and efficient school education and early years provision in their area. They also have a duty of improvement on behalf of their schools. In so doing East Renfrewshire, like all education authorities, has direct responsibility for the provision and quality of early learning and childcare and education within its schools. Part of ensuring quality and improvement is the provision of a quality built environment which supports the welfare of children, young people and staff and is conducive to highly effective learning and teaching.
- East Renfrewshire has the right to manage its education estate to deliver the best possible educational outcomes and experiences for all. The management of places, including capacity thresholds, is a feature of that and evidence shows that our schools and nursery environments have enabled the Education Department to deliver excellence and equity.
- As detailed in the Development Contributions SPG, its Education Addendum and BR4 the trigger to indicate the need to look at catchment places with a view to increasing available places, is based on a level of 90% for early years and primary, and 85% for secondary and Additional Support Needs (ASN) provision. A number of our schools are currently operating above these levels. Whilst the availability of places is not planned in this way (when considering new developments) in practice it is sometimes necessary for schools to operate above their planning capacity to some degree. Where this is the case, the Council will take appropriate and sustainable mitigation measures to address capacity.
- Pressures are not "modest", as Geddes state in Para 3.7, they are significant and they are ongoing; statistics within the National School Estates Census published by the Scottish Government show that East Renfrewshire has the highest percentage of primary schools above 100% occupancy throughout Scotland. Since 2011, overall pupil numbers have seen an increase (by over 700 pupils) in the non-denominational primary sector and not a decrease as incorrectly detailed in the Geddes Report. Comparing data to 2003 as shown in the Geddes Report is irrelevant for the purpose of this analysis. Recent data should be reviewed for the purpose of roll analysis in order to take account of recent and relevant trends.
- There is an assumption within the Geddes Report that all schools should accommodate and plan to 100% occupancy; in reality that may manifest through additional catchment demand and/or placing requests able to be admitted as the class size maxima increase from P4 to P7 in primary and marginally from S3 onwards in secondary depending on curricular choices and related available spaces as an interim solution. In terms of planning for catchment demand this is

not a sustainable approach and would be an interim solution. 100% occupancy is not the authority's planned or chosen threshold or desired operational level, which it is entitled to determine. Considering only 100% has the danger of placing the education authority in an difficult position where it is not be able to properly provide future sufficient places for its resident population; including for inward migration.

- Establishing new schools is a significant investment for the public purse, even with developer contribution assistance in capital terms; and the case demonstrating catchment demand is not considered without due diligence i.e. should for example the anticipated additional number of pupils take the occupancy of a primary school to say 95% of the planning capacity for the period ahead as projected, then a brand new school is not the first thing to be considered. This has arisen in the past where with some minor adjustments / internal modelling there has been comfort that the school can operate at this level for that defined period. However should that position change through for example changes in residential development, then the position would be reviewed and further measures / proposed solution considered. Taking into account already approved new residential development / windfall associated with LDP1, and already expanded provision, the school estate is at a critical point, with no scope to accommodate the extent of additional pupils in a large part of the authority without significant new infrastructure being key to the solution.
- It is the Council's view that the approach Geddes Consulting undertook to review school occupancies and their subsequent conclusions are incorrect, and would not be appropriate nor meet the needs of our resident population.
- Calderwood Lodge primary school was incorrectly allocated to the non-denominational in the Geddes Report rather than denominational sector as a Jewish faith school (in addition this school only accepts applicants via placing request with its catchment serving the whole of East Renfrewshire).
- St Cadoc's primary school is in a period of gradual reduction over the coming years, as widely reported, with the planned reinstatement back to a two stream primary now that the new St Clare's Primary School is operational (the former St Cadoc's Primary delineated catchment area was subdivided into revised delineated catchment areas for St Cadoc's and for St Clare's); and the new St Cadoc's nursery is now in place and operating within the St Cadoc's Primary School building.
- The table in Para 3.18 and Para 3.19 of the Geddes Report incorrectly states that there is spare capacity for 1,114 (933 + 181) secondary and 1,121 (787 + 334) primary pupils. The Council is of the opinion that these figures are incorrect. The Council has updated this Geddes Report table using East Renfrewshire School Census figures for 2018/19 (as published by Scottish Government from official census) and has highlighted the remaining pupil places when using the Council's planning for new provision threshold triggers of 90% and 85% for primary and secondary respectively, alongside the 100% occupancy which Geddes Consulting suggests the Council should work to (before considering new establishments that are necessary). The Council's methodology is as follows:

Area	Number of Pupils (2018/19)	Capacity (2018/19)	Occupancy % (2018/19)	Remaining Pupil Places (Based on 100% occupancy suggested by Geddes Report)	Remaining Pupil Places when Planning for New Provision (Threshold Triggers of 90% Primary and 85% Secondary)
<b>Non-Denominational Primary</b>					
<b>Council</b>	<b>6,170</b>	<b>6,912</b>	<b>89%</b>	<b>742</b>	<b>52</b>
Levern Valley	1,130	1,638	69%	508	345
Eastwood	5,040	5,274	96%	234	-293
<b>Non-Denominational Secondary</b>					
<b>Council</b>	<b>5,385</b>	<b>6,318</b>	<b>85%</b>	<b>933</b>	<b>-14</b>
Levern Valley	588	850	69%	262	135
Eastwood	4,797	5,468	88%	671	-149
<b>Denominational Primary (Roman Catholic)</b>					
<b>Council</b>	<b>2,960</b>	<b>3,204</b>	<b>92%</b>	<b>244</b>	<b>-76</b>
Levern Valley	721	924	78%	203	111
Eastwood	2,239	2,280	98%	41	-187
<b>Denominational Secondary (Roman Catholic)</b>					
<b>Council</b>	<b>2,371</b>	<b>2,552</b>	<b>93%</b>	<b>181</b>	<b>-201</b>
Levern Valley	595	848	70%	253	126
Eastwood	1,776	1,704	104%	-72	-327

- This revised table shows the full detail required to consider the need for new provision based on 2018/19 census figures; there is no spare capacity in the Eastwood sub area, while with the exception of the non-denominational primary sector, capacity in the Levern Valley is limited (based on remaining pupil places for new provision). Places are retained for catchment children that will emerge from existing, planned and approved development (including approved windfall development). These revised figures clearly show that the assumptions made in Paras 3.26 to 4.28 and the conclusions reached in Para 3.44 of the Geddes report are incorrect.
- The Geddes Report challenges that the Council has not considered the scale of future housing which could be accommodated within the existing school capacity (Para 3.24). The Council has fully considered this matter and this information is clearly set out in Tables 9 and 10 of BR4.
- Paras 3.31 to 3.45 and the mapping in Appendix 2 of the Geddes Report contain numerous errors, including the occupancy level bandings, suggesting that a 100% occupancy for the working capacity of a school is appropriate. They also make assumptions about Maidenhill Primary School. Maidenhill is a new non-denominational primary school recently established as part of the overall Maidenhill master plan (CD/@@), specifically to manage the additional educational requirements emerging from associated new developments allocated within LDP1. It will therefore not serve large volumes of additional housing beyond LDP1. Both

Mearns and Kirkhill Primary school delineated catchment areas have not been significantly condensed as a result of the introduction of Maidenhill Primary and its delineated catchment area, rather they have only seen partial reductions; they have not lost vast residential areas, mainly farmland which has been incorporated into Maidenhill's catchment. Moreover, Maidenhill did not have published rolls at the time of writing the Proposed Plan and BR4 (with the school only opening in August 2019), therefore presentation of a low occupancy banding is misleading.

- The reference to St Clare's Primary School in Para 3.38 of the Geddes Report is misleading. This is a new school where pupil numbers will increase after the transition from St Cadoc's Primary School is complete (St Clare's opened in 2017 subdividing the then St Cadoc's catchment and providing additional denominational places for the local resident populations (BR4 pages 15 and 20). Almost all pupils in the new St Clare's catchment area enrolled prior to 2017 remained in St Cadoc's Primary. Like Maidenhill Primary, St Clare's Primary School was also a requirement of the Maidenhill master plan and the pupils generated from this master plan area, as it builds out, will feed into the school and alter current occupancy levels.
- As explained above, the capacity threshold for secondary schools is 85% not 90% or 100% (as Para 3.39 of the Geddes Report argues). As an overall average, East Renfrewshire's secondary schools are currently operating over and above this level. Eastwood, Mearns Castle and Woodfarm high schools are currently borderline with 84% occupancy (2018 census) and occupancy will increase with the anticipated additional pupils emerging from new planned and approved housing developments in LDP1. Williamwood High School, Eastwood's fourth non-denominational secondary is already operating at 95% occupancy.
- St Ninian's High School is not 'operating at capacity' as stated in the Geddes Report (Para 3.41), rather it is operating over and above capacity at 104% occupancy.
- East Renfrewshire has well documented policies on school admission and P7 to S1 transfer arrangements which are necessary to help manage cases of oversubscription as a consequence of catchment demand.
- St Ninian's High School, is subject of exceptionally high demand from its catchment (in addition to attracting placing requests). There are currently admission and P7 to S1 transfer policy arrangements in place to help manage oversubscription as a consequence of catchment demand and in particular the significant demand from families of all denominations who are seeking a Roman Catholic education for their children. This policy includes the prioritisation of baptised Roman Catholic pupils residing in the catchment as per the policy referred to above. However this does not reduce overall pupil numbers across the school estate; rather the admission and transfer policy helps provide a place in a denominational (Roman Catholic) school for baptised Roman Catholic pupils and redistribute demand across the non-denominational and denominational sectors.
- Given the pressures at St Ninian's High School it has been necessary to impose the admissions and transfer policy and prioritise Roman Catholic baptised pupils when allocating catchment places. However in doing so, those catchment pupils who did not obtain a place at St Ninian's have been allocated a place at their alternative non-denominational secondary school. This impacts on Eastwood, Mearns Castle, Williamwood and Woodfarm high schools, as St Ninian's delineated catchment area covers all four of these non-denominational school's delineated catchment areas. The proposed temporary accommodation at St Ninian's High School has been planned for a limited period of time in order to deal with existing

pressures and the transitional change in admission and transfer policy arrangements (approved by the Education Committee and Council).

### **Pupil Product Ratios (PPRs)**

- The Geddes Report disputes the Council's Pupil Product Ratio (PPR) approach. The Council strongly disagrees with the assertion that it has not provided any evidence to substantiate the approach used for calculating PPRs.
- BR4 clearly provides the methodology and evidence for calculating the Council's PPRs. Sample size is provided in BR4 and also within the Education Addendum to the Development Contribution SPG, contrary to the view set out in Para 4.10 of the Geddes Report. Individual property size is not a factor in the Council's PPR methodology; rather an audit of more than 800 properties across 15 established developments, covering both the Eastwood and Lavern Valley areas and including areas of mixed house types, sizes and tenures was carried out and collated. This approach removes the need to apply increases or reductions depending on bedroom size and allows the establishment of a cost per residential property (regardless of size and type), providing certainty and avoiding the need to recalculate contribution requirements each time plans or proposals change (all as detailed in the Development Contributions SPG and Education Addendum). A PPR breakdown by property size is therefore not available. As specified, the PPR system matches the specific housing units audited with existing pupil addresses. The Council cannot match to external (non ERC resident) pupils as it is only relevant that comparison is drawn to housing within the Council area.
- The Geddes Report (Para 4.8) challenged the Authority on the availability of PPR granular data, referencing the provision of this data by other local authorities. 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.
- The combined PPR approach suggested in the Geddes Report does not take account of the Council's statutory requirement to provide denominational (Roman Catholic) Education.
- Paras 4.6, 4.34 and 7.3 of the Geddes Report state that the Council's PPRs are significantly higher than those of other Local Authorities and the national average. East Renfrewshire is recognised throughout Scotland for the quality of its education provision and the high performance of its schools. This success has contributed to a subsequent growth in the number of pupils in our schools and children in our early year's facilities. This growth is reflected in the NRS Mid 2019 Population Estimates (CD/@@) which report that in East Renfrewshire 19% of the population (1 in 5 residents) are now children from the age 0-14; this is the highest proportion of all local authorities in Scotland. As a result East Renfrewshire PPRs will understandably be over and above those of other local authorities and average Scottish figures. Inherent with any average is that there will be some above and some below the average. The exercise undertaken by the Council is based on evidence of pupils recorded in the official census residing in the properties that provide a mix of type and size across different parts of the Council area.
- If families move within the authority then houses will be freed up for new families, which in many cases leads to additional pupils moving into ERC schools from out with the authority area. Our projections do not include the potential further effects



of migration, other than at the key admission stages of P1 and S1 and accordingly a fair and reasonable approach is taken.

- In relation to the PPRs, the Geddes Report proposes the averaging of two sets of incomparable data. The Eastwood and Levern Valley areas are very different; Eastwood is a more populated area with more dwellings and a greater population, while the Levern Valley has fewer houses and villages which are physically dispersed (28,000 properties in Eastwood versus 10,000 properties in Levern Valley at the time of the audit in winter 2018). Therefore the two areas cannot be given the same weighting as Geddes has insinuated (Paras 3.25, 3.26 and 4.34). Furthermore denominational and non-denominational education are separate educational routes and both require full consideration. Based on the incorrect approach adopted, the conclusions reached in the Geddes Report are also inaccurate (Paras 3.27 to 3.30 and 3.44).
- The consideration of demand for pupil places is not appropriately considered in the Geddes Report (Paras 4.28 to 4.32, 5.33 and 5.35). The Council's cumulative projection methodology is provided within the Council's Development Contributions SPG as well as within BR4 and was also detailed in the Council's FOI response to Geddes Consulting (which they chose not to follow up; seeking no further clarity or confirmation). This cumulative approach was considered 'appropriate' by Homes for Scotland within their response to Fife's Planning Obligations Supplementary Guidance Consultation Draft' May 17 (Para 2.6) (CD/@@). This is also the approach of the Council's Development Contributions SPG as detailed within the Education Cumulative Calculation and is analysed by school catchment. This approach has been accepted by the Scottish Government and Development Industry
- PPRs are applied to the agreed annual Housing Land Audit (HLA) programming in order to determine the number of places required. The cumulative approach projects future years on the basis of all HLA programming to that point. Future projections are reviewed on an annual basis with the new agreed HLA in order to incorporate actual places required from new developments (Para 5.33 of the Geddes Report). With each review a projection check is also actioned, updating P1 and S1 rolls as necessary. Analysis is conducted to compare intakes to roll projections from previous years and to ensure that results are comparable with predictions.
- Pupil forecasting and the impact of cumulative housing was presented in the Council Reports of October 2018 and June 2019 and helped to inform the approach taken in the Proposed Plan, contrary to the statement in Para 2.19 of the Geddes Report.

### **Placing Requests**

- Schools can have high occupancy levels as a consequence of demand from their delineated catchment areas and/or through places being allocated through the legislative placing request process; these placing requests can be received from East Renfrewshire resident pupils or from families residing out with East Renfrewshire. 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.
- As expected, the number of placing requests has been decreasing year on year in line with the increase in the resident catchment population. Conclusions drawn in the Geddes Report have significant legal implications; existing external pupils (those residing outwith ERC) cannot be managed out of the education system in

East Renfrewshire to other areas as inferred in Para 3.45 and 7.5 of their report. Should there be available places, then the authority must grant these to placing requests in accordance with the legislation; only a reasonable number of reserve places are permitted to be kept for potential catchment pupils moving in during the year. East Renfrewshire complies with this in managing school places. Once a child is accepted into an East Renfrewshire school, including through successful placing request applications, they are considered equal and entitled to remain in that school until P7/S6 as appropriate. Due to the popularity of East Renfrewshire schools, placing requests are common, with a good number of those requests not able to be granted, challenged at appeal stage (including a number following through to the sheriff court) each year.

- The Education Department is highly experienced in the management of placing requests, granting unless there is a valid legal reason not to do so, reserving a reasonable number of places where possible and defending decisions made. Given the keenness to attain a place in East Renfrewshire schools there is considerable interest and scrutiny and the authority is well aware of due process and procedure.
- The authority has a duty to plan for and provide sufficient places for East Renfrewshire children and young people. An important aspect in assessing whether there are sufficient places within the system, is to consider educational demand from residents and available places in P1 and S1 (given P1 and S1 are the new intake year groups that will progress through schools and when most children are admitted to school). The department's assessment of the need for additional provision involves considering these year groups and does not build in any allowance for new placing requests. In time later stages which currently have pupils enrolled by means of placing requests (children residing out with the authority) will naturally see those placing request numbers decline as pupils progress through their schooling (Paras 3.8, 3.13 - 3.15, 3.45, 6.7 - 6.11, 7.5 of the Geddes Report).
- The aforementioned changes to admission and transfer arrangements have also been used effectively to manage places across the denominational (Roman Catholic) and non-denominational sectors for local catchment pupils and to prioritise remaining spaces for placing requests. A review of school admissions and transfer arrangements was undertaken in 2016 in accordance with the education schools consultation act as acknowledged by Para 6.11 of the Geddes Report.
- The Council has significantly reduced the intake of external pupils at P1 and S1 in recent years (for example at Crookfur Primary School), however as previously mentioned pupils already in the Council's schools will continue for the remainder of their education.
- A rise in the resident population has resulted in a decrease in the number of granted external placements. As reported in the Council's most recent Planning for the Future document which was issued following the preparation of the Proposed Plan and BR4, the last 10 years (2008-2018) has seen an increase in 1,370 East Renfrewshire resident primary pupils, this is nearly 1,000 more pupils than stated in the Geddes Report. The Planning for the Future document clearly and graphically shows the increase over time in the number of East Renfrewshire resident pupils attending the Council's schools in the primary and secondary sectors. In addition this document also details that 92% of primary pupils are now East Renfrewshire residents, compared to 87% in 2008; and conversely the number of external placements in primary schools was down to 8% in 2018 from 13.2% in 2008. The

net migration NRS population data shown in the charts on page 7 of BR4 record the increase in children residing in East Renfrewshire.

- The Geddes Report presents a number of incorrect calculations; including adding full secondary rolls and East Renfrewshire only (resident) secondary rolls together (Para 3.6). 18% of secondary pupils are formed of external pupils not 20% in 2017; however in 2018 this figure dropped further to 16.1%. Additionally the number of external pupils should not be compared to population increases. The Geddes report (Para 3.12) comes to the conclusion that external pupils are decreasing, however incorrectly state that this frees up space in secondary schools; if the numbers and rolls had been reviewed, it would have been evident that these external places are being replaced by East Renfrewshire resident pupils. A total of 207 placing requests were granted to residents who resided out with the Council area seeking a place in school session 2019/20. The Geddes report describes this as significant (Para 3.13). This is not significant and represents a total across all stages in all schools, as noted in the FOI response to Geddes in December 2019. As noted earlier East Renfrewshire schools are popular and whilst this number was granted, at least double that figure is generally submitted each year seeking a place i.e. under half are able to be accommodated. In 2018/19 in primary schools alone there were 343 classes; with the distribution of pupils across classes (the classification being established taking cognisance of the relevant pupil to teacher ratio for each year stage) and reserving a reasonable number of places where possible and necessary to do so, there is inevitably some remaining places that can be released for placing requests. Please note that education authorities must comply with legislation associated with reserved places as reasonably required. East Renfrewshire Education Department ensures that the number of reserved places held for a year stage at a school for potential future catchment applicants, remains large enough to allow the local authority to meet its statutory duty of providing an appropriate education, preferably in a child's local catchment school where possible, but is kept as low as possible in order to meet our statutory duties with regards to placing request applicants.

### **Online Catchments**

- Para 3.31 of the Geddes Report queries the lack of online school catchment area information and states that the majority of local authorities provide online catchments in 2019.
- East Renfrewshire's current system of making catchment maps available has worked effectively and has responded to the very few requests over the years for an electronic version by providing them with the catchment maps on CD ROM, however, the Council has recently adopted a new, more advanced, mapping system and as part of its implementation, work is currently being undertaken to provide catchment information online for residents for the next academic session.

### **Development Strategy and Education Mitigation**

- Section 5 of the Geddes Report assesses the impact of the existing LDP1 strategy on education infrastructure and the mitigation requirements to accommodate additional housing as part of the emerging LDP2. Para 3.21 also states that there is some capacity to accommodate places for future development. The Council strongly disagrees with these statements and the conclusions reached in the Geddes Report.

- The tables in Para 5.2 and 5.4 of the Geddes Report show expected completions up to 2031 based upon the 2019 HLA (CD/@@). However, as clearly evidenced under Issue 14 and BR1 (CD/@@), the approach Geddes Consulting have taken for longer term programming post 2026 is flawed. For example Geddes Consulting do not factor in the later phases of master plan sites which is a significant error. The programmed residential completions up to 2031 stated by Geddes of 3194 in Para 5.4 are therefore significantly lower than those evidenced by the Council in BR1 and the following table, with a difference of 342 units (3536-3194). This has significant implications when applying PPRs and in turn identifying any spare educational capacity across the Council area.
- Using corrections the resultant pupils and remaining capacity from housing as well as highlighting the remaining pupil places when planning for new provision (utilising threshold triggers of 90% for primary) alongside the 100% occupancy Geddes suggest the Council should work to before considering new establishments that are necessary is as follows:

Area	Expected Completions to 2031 (Private & Social Rented) (ERC figures)	Expected Primary Pupils	2018/19 Primary Capacity	2018/19 Spare Primary Capacity when Planning for New Provision (Threshold Trigger of 90%)	Remaining Capacity with inclusion of expected completions to 2031 (assuming 100% occupancy i.e. no future planning for schools)	Remaining Capacity with inclusion of expected completions to 2031 when Planning for New Provision (Threshold Triggers of 90% Primary)
Levern Valley	1931	619	711	456	92	-163
Eastwood	1605*	932	275*	-480*	-657*	-1412*
Total	3536	1551	986	-24	-565	-1575

\*Please note Maidenhill Primary School did not open until the 2019/20 academic session and has therefore not been included within these figures as reference is to the 2018/19 session (however Geddes incorrectly reference 2017/18 while using 2018/19 data).

- This revised table clearly shows that when using the Council's planning for new provision thresholds and considering the inclusion of expected completions from LDP1, there is no spare capacity across the education estate in either the Eastwood or Levern Valley sub areas, contrary to the conclusions reached in the Geddes Report. Even when using the incorrect 100% threshold used by Geddes Consulting, there would only be 92 primary places available in the Levern Valley area when adding expected completions from LDP1. This is the case before the potential impact of the originally identified MIR housing sites is factored in.
- The Geddes Report provides an assessment of remaining capacity, based upon their figures, once MIR sites are factored in (Para 5.12 of the report) and concludes that there is spare capacity in the Levern Valley sub area but not Eastwood. As explained above this analysis is inaccurate. Their analysis also fails to take into

account that the Levern Valley MIR sites MIR9 and MIR10, both at Glasgow Road Barrhead, have subsequently been granted planning permission, with MIR10 now under construction. Both sites are identified in the Proposed Plan as housing sites within Schedule 15 (SG1.12 and SG1.13) and are included within the 2019 HLA. Para 5.15 of the Geddes Report also inaccurately concludes that the impact in the Eastwood area could be mitigated by extensions to Crookfur, Busby and Eaglesham Primary Schools.

- It should be noted that the proposed extensions to existing schools listed within Schedule 9 'Education Facilities' of the Proposed Plan are identified to address existing issues and the impacts of LDP1. Further additional extensions are not possible at Crookfur, Busby and Eaglesham Primary Schools as explained in Table 9 of BR4.
- The provision of placing requests to non ERC pupils cannot be compared to a 3-4 stream school as reported by Geddes; these pupils are spread throughout year groups (mostly now in later years) across the different Council areas, across denominations and establishments (Paras 3.21, 3.23, 5.10).
- As explained above it is inappropriate to assume 100% occupancy across the entire East Renfrewshire school estate before solutions are implemented. Moreover primaries and secondaries will require separate modelling and cannot be treated as the same entity. Needs will also vary; the statement that a two-stream school will be required (Para 5.15), does not address the fact that both denominational and non-denominational places will be required, along with need to address the estate in a planned and best value way for a period into the future.
- The conclusion made in the Geddes Report that only 52 denominational secondary places would be required from 865 new homes in Eastwood from MIR sites in Paras 5.29 and 5.30 is flawed in that it does not take into account the transition from primary to secondary (pupils from new housing at primary level will eventually move on to secondary); the cumulative effect of LDP1; windfall sites; or the temporary adjustment related to the change in admission arrangements (until those learners in P1 from January 2016 transfer through to St Ninian's High School). In addition, consideration is not given to the current occupancy levels of St Ninian's High School (the Council's only denominational secondary school in the Eastwood area), which already exceeds 100% occupancy.
- In Para 5.35, 3<sup>rd</sup> bullet point, Geddes requested confirmation on infrastructure solutions. As reported by the Council in October 2018 and June 2019, the education infrastructure solutions proposed by the Council were not simply to provide additional educational spaces for new homes; they were also proposed to help address increases in the population of young people, inward migration and the second hand housing and rental market. Several solutions would be required to work in conjunction with one another prior to the installation of further housing through a future review of the LDP.

## **Education Mitigation**

### **New Schools and Extensions**

- It is evident through the significant investment in the education estate with extensions to existing schools, new build larger replacement schools and new schools and early years' facilities that East Renfrewshire has proactively managed the number of education places in response to inward migration and new residential developments to date. This continues to be a key requirement in local development planning terms and the Council is acutely aware of the lack of Council owned land and that many existing schools have already been remodelled and extended to

maximise available places and reflect changes to maximum class sizes that have evolved via new legislation and national guidance.

- As summarised in BR4, existing schools (out with those identified for extensions) cannot support mitigation efforts and additional land would have been required to support the MIR sites originally proposed through LDP2, to ensure efficient and effective management of the school estate (Para 5.22 to 5.25, 5.27, 6.12 to 6.23, 6.27 and 6.29 of the Geddes Report). Rearranging school catchments also requires local knowledge and a detailed understanding of the impacts any changes would have on the entire authority area as explained further below.
- Over the years in providing additional new places, existing schools have been remodelled in order to efficiently use and maximise floor space. This option is now exhausted and where extensions have been necessary to schools, these have been kept small to accommodate the constraints of school grounds/sites and combined with a remodel of existing school buildings to reduce expenditure. The October 2018 Council Report clearly stated that *“The delivery of the overall strategic approach to growth, as set out in the MIR under option 2A, will be wholly dependent on safeguarding suitable sites for, and the delivery of, the school proposals.”* The issue with identifying and securing appropriate land was also addressed in this report *“The Council has little or no land appropriate for this purpose within its ownership. A secondary school would require a site of around 20 acres and a primary school would require around 10 acres.”* Attempts to identify potential school locations within the Eastwood area have so far been unsuccessful as the availability of sites is extremely limited. The Council owns little land in the Eastwood area and certainly no land appropriate for this purpose. Discussions with landowners and developers are continuing. Land ownership and site assembly within the Eastwood area remains a key issue for the Council and will be addressed in future LDPs.
- Provision of a second denominational secondary within Eastwood would also require remodelling of the existing school along with a gradual reduction so the school does not fill with placing requests. A sensible number of primary schools and resulting pupil numbers would require to be associated with each catchment secondary school. References to the site size for the primary sector, depends on ultimate location and what further services are required such as facilities for early years or to provide additional support needs.
- As noted above, the establishment of a new school is expensive and efficient and effective management of the public educational estate prudently needs to consider future long term growth beyond the provisions of LDP 2. Decisions on the requisite land take and requirements for new schools is a matter for East Renfrewshire Council to determine on the basis of what is agreed that the school’s community needs, accounting for emerging flexible curriculum and the standards and quality that the authority has set whilst adhering to relevant space standards, appropriate guidance and best value. There is little information from Authority’s across Scotland in terms of land requirements; however Aberdeenshire for instance request almost 7 acres for a 440 capacity school (around 2 streams) while East Renfrewshire would look for 10 acres for 4 streams (840 capacity). The requirements for Early Years and Additional Support (Special Needs) facilities also must be addressed within potential new developments.
- Para 6.23 of the Geddes Report states that temporary accommodation should be considered as a suitable and cost effective solution. Whilst also recognising that many school grounds would be unable to accommodate further extension and comply with all the other space standards for play space etc., it should still be noted that temporary accommodation is not a desired solution and indeed may not be

cost effective; anomalies in the pupil yield from the second hand housing market may require support in the form of temporary accommodation however this is not a long term solution.

- BR4 (page 6) states: *“As noted, provision has expanded in response to growth and new requirements, nonetheless many educational establishments have increasingly high occupancy levels, particularly so within the Eastwood area; however places in the Lavern Valley area are also now starting to face pressure. Further expansion is planned to meet continued needs associated with the adopted Local Development Plan (LDP1) and known approved windfall sites”*.
- The Education Department continually monitors and reviews demand and availability to plan for sufficient pupil places for East Renfrewshire’s population. The Council is committed to fully addressing the requirement for further residential development whilst fully addressing future educational needs for residents in a coordinated, phased and planned way through future LDPs and in doing so seek the best value preferred option for its residents that sustains excellence and equity that underpins East Renfrewshire education.

### **Catchment Reviews**

- The geographical area of East Renfrewshire Council is divided into delineated catchment areas for primary and secondary schools. Some catchment areas comprise dense residential development and are relatively compact in size whilst others are large with some urban areas and large rural expanses. The geographical boundaries between catchments are often major roads, rivers, rail lines.
- Catchment reviews and rearrangements require full Education Scotland Statutory Consultation and are lengthy, detailed pieces of work. The scale of the challenge as presented will more than likely require the inclusion of the full authority, as detailed in the October 2018 Council report, which would require extensive consultation with stakeholders (recognising this is highly likely to be unpopular by many) and approval by elected members (who would need to consider the implications in order to provide their support to actually go out to public consultation). Given the local geography and that a number of neighbouring schools have high occupancy levels, analysis has shown that this approach alone will not provide the solution to address capacity; the provision of additional places will also be required. The Council has clearly considered this option, contrary to the statements made in Para 6.3 to 6.6 of the Geddes Report.
- It would not be possible to take forward the proposal to utilise apparent spare capacity in Barrhead High School to address pressures in Eastwood High School. Notwithstanding that the capacity of Barrhead High School is required to address the additional housing in its catchment (from LDP1 and approved windfall development) and changing demographics in the area, amongst other matters the geography of the wider area must be considered. The associated primary schools of Eastwood High School include two in the Lavern Valley area of which only one is signposted by Geddes (Para 3.40 of their report). Eastwood High School is the secondary school children from Neilston and Uplawmoor attend given local train lines. In order to take forward such a decision, the education authority would require local and elected member support which would be unlikely due to the impractical nature of this solution, which lacks viability.
- Before extending the school estate the department has always looked to review school catchments to see if such changes could manage places. An early example of this was for the delineated catchment area of St Ninian’s High School, which was changed following statutory consultation in 2010/11.

- The department also considered if it was possible to ease pressure on available primary school places in the Newton Mearns area by reviewing school catchments as part of initial options for LDP1.
- In 2016/17 the consultation proposal and report to establish the new Maidenhill Primary School details evidence of that catchment review. In the proposal document it states: 'Crookfur Primary School is the other non-denominational primary school in the Newton Mearns area. The 2-stream provision at Crookfur Primary School is required to meet demand from its delineated catchment area. There is new residential development in the Crookfur catchment area and there is not scope to realign its delineated catchment area with that of Kirkhill/Mearns delineated catchment areas to alleviate the need for new provision. Crookfur nursery class has also recently been extended to 90:90 places from August 2016 to meet demand and the school is currently undergoing major remodelling and refurbishment.' For information the Council's capital plan now includes provision for an extension at Crookfur Primary School to meet housing needs in its catchment, given sustained new levels of growth and the nursery referred to here is being relocated to a new build as part of the council's early years expansion. As this catchment review did not provide a solution for LDP1, the education authority consulted on establishing new schools and associated changes to the existing local primary school catchments (thereby the new St Clare's Primary School was established with a catchment change to St Cadoc's Primary School and also the new Maidenhill Primary School was established with catchment changes to Kirkhill Primary School and Mearns Primary School).

#### **Investment and Funding**

- The Proposed Plan is clear that investment and funding, in addition to development contributions, will be actively sought to support the delivery of any new and additional capacity (Paras 6.26 of Geddes Report).

#### **Levern Valley Sub-Area**

- The Geddes Report and the representations from Miller Homes (463/9), Avant Homes (504/9), Mactaggart & Mickel (507/4) and Barratt Homes (511/4) refer to capacity within the Levern Valley sub area (Para 2.15, 3.37 and 5.13). The Geddes Report incorrectly states that "*there are no significant education capacity constraints in the Levern Valley Sub-Area...in any sector*" (Para 3.20). The Council strongly refutes this assumption as demonstrated above.
- The Proposed Plan, Education Background Report (BR4) and various Council Reports all refer to pressures and capacity constraints in the Levern Valley Sub area as shown below:
  - Report to East Renfrewshire Council October 18 Para 29; "*...this may result in the need to provide an extension to non-denominational primary schools in the Levern Valley.*"
  - Proposed Plan page 78 2<sup>nd</sup> Para: "*Accordingly, many educational establishments have high occupancy levels and increasingly so within the Eastwood area; however places in the Levern Valley area are also now starting to face pressure.*"
  - BR4 page 6 Para 8 "*....however places in the Levern Valley areas are also now starting to face pressure.*"
- As stated above, the Council will continue to monitor the impact of new development on the school estate in the Levern Valley sub area. The existing schools will support LDP1 and approved windfall development, however any



additional housing would cause capacity problems within the school estate in Lavern Valley.

- The Council has clearly evidenced the strategic approach taken for the Proposed Plan and its approach to current and future education provision and mitigation through the Education background Report (BR4) and other Council Reports. The robust approach demonstrated by the Council is based upon many years of deliberations, rather than a limited or lack of analysis as suggested in the Geddes Report.

### **Summary**

In response to the representations raised the Council has been transparent and has clearly explained and responded to the following points within this Schedule 4 document, Development Contributions SPG and its Education Addendum, BR4 and FOI Response:

- Justification for the Development Strategy;
- The existing pressure and lack of capacity across the school estate for both the Eastwood and Lavern Valley areas;
- Future roll projections;
- The approach taken in calculating primary and secondary school capacities;
- The Council's methodology for calculating PPRs;
- The Council's approach towards placing requests;
- Potential mitigation measures:
- The complexity of a full catchment review process;
- The position on school extensions and alterations;
- Difficulties with site assembly and land within Council ownership; and
- The Council's development contributions process;
- The Council's school estate has developed over the years: it has been internally remodelled, incrementally extended, major new extensions have been built, school catchments have been reviewed and changed where possible to control existing places, and in establishing new provision school admissions / transfer arrangements have been changed, and new schools have been established. The Council has exhausted all options and must now plan to substantially extend its school estate to cope with any further additional new residential development that may emerge through future LDPs.
- As stated above, the Council acknowledges the need to continually monitor the demand for education places and is committed to fully addressing future education infrastructure requirements in a long term, coordinated and planned way through future LDPs.
- It is not proposed to modify the Plan based upon the above.

### **(b) Schedule 8: Community Facilities - Proposal D12.5: Eastwood Park, Giffnock**

#### Jackson Carlaw MSP (428/3)

- The description to the proposal clearly states that a master plan will be prepared to look at options for leisure centre uses and remodelling of wider park issues. The Council does not agree that additional text as suggested is required.
- It is not proposed to modify the Plan based upon the above.

**(c) Schedule 8: Community Facilities - Proposal D12.9: Overlee Park, Netherlee**Alexander Newall (121/4)

- The Council acknowledges and welcomes the support for a new sports pavilion and family centre at Overlee Park. No other proposals are identified for this area with the remainder of the site protected as urban greenspace under Policy D5.
- It is not proposed to modify the Plan based upon the above.

**(d) Schedule 9: Education Facilities - Proposal D12.17: Neilston Primary School, Neilston**SEPA (492/1)

- In this particular case, it is acknowledged that there may be an issue with respect to surface water flooding. Parts of the site are subject to Low and Medium risk.
- The comments of SEPA will be taken fully into account as part of the decision making process.
- If the Reporter is so minded to recommend that the representation from SEPA is accepted and the plan modified to reflect the need for a Flood Risk Assessment, the Council would be supportive of this modification.

In Schedule 9 add (revised text italics):*FRA: Flood Risk Assessment will be required to determine the developable extent of the site and to ensure that the proposal is consistent with SPP.***Reporter's conclusions:****Reporter's recommendations:**

<b>Issue 14</b>	Housing Supply, Delivery and Phasing	
<b>Development plan reference:</b>	Policy SG1: Housing Supply, Delivery and Phasing	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Persimmon Homes (382/2) (384/2) (397/7)  Miller Homes (463/4) (463/7) (463/11)  Cala Homes (West) (464/5) (464/7) (464/10)  Eddie Casey (466/2)  Cala Homes (West) and Lynch Homes (467/3)  Homes For Scotland (476/10)  Scottish Government (486/5)  Stewart Milne (487/2) (488/2)  Wallace Land Investments (489/6) (489/8)  Mactaggart &amp; Mickel (490/2) (493/3)  Romano Family (494/2)  Robertson Homes (495/8)  Taylor Wimpey (497/2)  Gladman Developments Ltd (503/3) (503/4) (571/4)  Avant Homes (504/5) (504/7) (504/11)  Lynch Homes (505/6)  Mactaggart &amp; Mickel (507/3)  Barratt Homes West (511/3)</p>		
<b>Provision of the development plan to which the issue relates:</b>	Section 4: Promoting Sustainable and Inclusive Economic Growth Meeting Housing Needs How Many New Homes are Needed by 2029 Housing Supply, Delivery and Phasing Table 1: Housing Supply Targets and Land Requirement 2012-2029 Table 2: Monitoring of Housing land Supply 2012-2029	
<b>Planning authority's summary of the representation(s):</b>		
<p>This section of the Plan relates solely to representations raised in relation to the Housing Land Supply and the Policies contained within this section. Representations relating to specific sites allocated for residential development are addressed under Issues 15 to 19 and alternative site proposals are addressed under Issues 20 to 27.</p> <p><u>Persimmon Homes (382/2) (384/2) (397/7)</u></p> <ul style="list-style-type: none"> <li>• Failure of the proposed plan to provide new additional housing sites is flawed.</li> <li>• Enormous housing pressure facing ER.</li> <li>• Homes in East Renfrewshire will become more expensive due to lack of supply.</li> <li>• The Proposed Plan claims that there is a sufficient and generous housing land supply within East Renfrewshire to meet the housing requirements of SPP and</li> </ul>		

Clydeplan. Proposed Plan fails to provide evidence that adequate land supply exists at the HSMA, this is a clear requirement of Policy 8 of the SDP.

- Despite adhering to the Housing Land Requirement of the SDP; this does not preclude the allocation of additional sites as it is clear that there are material considerations which justify the allocation of land in addition to Housing Land Requirement within the SDP; namely the lack of affordability. The targets set out in the SDP represent minimum targets to be met and not ceilings on the amount of land which can be allocated.
- SPP places a clear focus throughout on delivering sustainable economic growth; Sustainable forms of development should be provided in order to address the chronic affordability crisis and housing pressures in East Renfrewshire as well supporting economic growth in the area.

Miller Homes (463/7) (463/11), Cala Homes (West) (464/7) (464/10), Cala Homes (West) and Lynch Homes (467/3), Wallace Land Investments (489/8), Avant Homes (504/7) (504/11), Barratt Homes West (511/3)

- Policy SG1 does not address the policy requirements of Clydeplan. Clydeplan provides a clear framework of criteria to satisfy to remedy any shortfalls in the five year effective housing land supply.
- The housing land supply statement prepared by Geddes concludes that the Council's proposed development strategy does not meet the requirements set out by Clydeplan SDP and Scottish Planning Policy (SPP), does not adopt the correct housing land requirements, contrary to the approved SDP; and does not provide programming of the established land supply to be built out to 2031, as required by the approved SDP and SPP. The Statement confirms that there may be marginal surplus in the established housing land supply required to meet the all tenure housing land requirement and private sector housing land requirement in full over the periods of the approved Clydeplan SDP. It is expected that the proposed development strategy will maintain a five year effective housing land supply at all times. However, the Council has not identified if the private sector housing land requirements by housing sub-market area (Renfrewshire and Greater Glasgow South) have been met. The Proposed LDP 2 therefore needs to be modified. As a result, additional effective housing land allocations may be required prior to the submission the Proposed LDP 2 to Examination.

Miller Homes (463/4), Cala Homes (West) (464/5), Wallace Land Investments (489/6), Avant Homes (504/5)

- In accordance with Policy 8 of Clydeplan the HLR to 2031 needs to be identified:
  - All tenure by LA (Schedule 8) 2012-2031;
  - Private sector by LA (Schedule 10) 2012-2031;
  - Private sector by Renfrewshire HSMA (Schedule 9) 2012-2031; and
  - Private sector by Greater Glasgow South HSMA 2012-2031.
- The Proposed LDP2 does not identify how each of these housing land requirements will be met. Tables 1 and 2 require to be modified to align with Clydeplan.

Eddie Casey (466/2)

- The Council should avoid such over-dependence on large, strategic masterplan sites alongside a reliance on 'infill' brownfield land for the delivery of private housing.
- Limiting the release of Green Belt Sites for housing development is extremely conservative and lacks the flexibility required to accommodate wider aspirations within the LDP2 to provide a varied housing mix within sustainable locations across East Renfrewshire.
- Council-wide approach effectively limiting housing to the three strategic opportunity sites does not enable future development within areas that do not have any such pressures on educational infrastructure. This reaffirms that the Council's approach should not be applied across all areas.
- The Council has not considered that the phasing of forthcoming sites could be applied to restrict development until such improvements to educational infrastructure has taken place.

#### Cala Homes (West) and Lynch Homes (467/3)

- The approach to Education is effectively a 'blanket restriction' on any additional new housing sites and is unnecessary and inflexible. The approach is at odds with the Council's spatial strategy which should be to support the consolidation and regeneration of existing urban areas, alongside controlled edge of settlement growth; it prevents new development coming forward in 'pockets' of the Council area where education pressures are not significant (i.e. where schools have remaining capacity) and approach fails to take into account the phasing plans being proposed by prospective developers.

#### Homes For Scotland (476/10), Stewart Milne (487/2) (488/2), Mactaggart & Mickel (490/2) (493/3), Robertson Homes (495/8), Taylor Wimpey (497/2), Lynch Homes (505/6), Mactaggart & Mickel (507/3)

- The Geddes 'Housing Land Supply' Statement concludes that the Council's proposed development strategy does not meet the requirements set out by Clydeplan SDP and Scottish Planning Policy.
- Additional housing is required to provide a range of choices and to address affordability issues.
- Not allocating any new sites in LDP2 would risk leaving greater challenges to be addressed in the next LDP.
- The LDP2 strategy represents an unfortunate reversal of the preferred option at the MIR stage which would have seen modest new housing allocations. New allocations would augment the existing spatial strategy and provide much needed additional homes of all tenures. Failure to do so is inconsistent with the requirement to plan for sustainable economic growth in SPP.
- Constraining supply further is likely to place increased pressure on affordability.
- Housing development in concert with other funding streams could help in the delivery of new infrastructure through LDP2.
- The Proposed LDP does not fully demonstrate compliance with the housing requirements of Clydeplan as submarkets are not considered nor is an allowance made for the anticipated date of adoption in 2031. Nevertheless, even if consistency with the SDP is demonstrated it does not necessarily mean the challenges outlined above are being addressed.

- The targets set out in the SDP represent minimum targets to be met and not ceilings on the amount of land which can be allocated. The Proposed LDP can allocate land in addition to the SDP targets and there is clear justification in this case, particularly to address the issue of affordability.
- The Proposed LDP does not give due weight to the net economic benefits of homebuilding.
- The Proposed LDP does not factor in demolitions.
- The decision to not allocate new housing sites is inconsistent with East Renfrewshire's Outcome Delivery Plan 2019 – 2022.
- The approach to the HLR and land supply is set out on page 93 and 95 of the Proposed LDP; however, the information set out is incomplete.
- Table 1 shows that the Local Authority Land supply appears to be consistent with Clydeplan's requirements at this stage; however, insufficient information is provided to demonstrate that adequate land supply exists in the two HSMAs. This is a clear requirement of Policy 8 of the SDP.

#### Scottish Government (486/5)

- To demonstrate consistency with SPP paras 115 and 120 the plan should set out the housing supply target by functional housing market area.

#### Romano Family (494/2)

- The LDP2 relies on the expansion areas in Newton Mearns and Barrhead, it requires housing allocations in other areas.

#### Gladman Developments Ltd (503/3) (503/4) (571/4)

- Object to the Housing land supply methodology.
- The Council has failed to allocate any additional land within the authority area, instead relying on previous allocations to meet this need. The increasing population coupled with already apparent housing pressures could be resolved by being more ambitious with their housing allocations.
- SPP clearly allows for local authorities to allocate above and beyond 5 years supply. Despite acknowledging the housing pressures the Council has not been pro-active to provide additional housing land and relying on previous allocations. Increasing the range and choice of housing sites in various locations will contribute to remedying these pressures.
- Housing targets and requirements are treated as a minimum, East Renfrewshire should promote higher levels of allocations to contribute to alleviating acknowledged issues.
- The approach taken to the housing land requirement for East Renfrewshire, as set out in Clydeplan, has not been adequately incorporated into the Proposed LDP.
- The approach fails to meet the requirements of para 118 and 119 of SPP, as an adequate number of sites have not been identified for the private sector.
- The Proposed LDP does not provide the private housing land requirement to be met in full for the Lavern Valley HMA. There is a clear shortfall in the 5 year supply of effective private housing land that requires addressing in the Lavern Valley HMA.
- Part of the Council's justification for no new housing allocations is due to education constraints, however with a strategic approach it is believed this position could be

resolved. The Council should take a pro-active approach to identifying solutions which would overcome this constraint.

- Lack of new housing allocations coupled with acknowledged housing pressures, will only exacerbate the situation, with housing completions set to increase slightly and then decline, resulting in an overall downward trend of completions. This will further contribute to housing pressures.
- East Renfrewshire need to allocate new sites and not rely on the existing supply.
- The background report calculates the supply of housing land for each period and the overall period from 2012-2029. Gladman disagree with the methods used by East Renfrewshire Council for calculating the 5 year supply of effective housing land.
- The Council has failed to assess the 5 year supply of effective housing land against the housing land requirement, therefore has failed to take into consideration the generosity margin required by SPP.
- The local authority should calculate housing land supply using the housing land requirement set out in Clydeplan (quoting paras 116 and 118 of SPP together with Policy 8 of Clydeplan)..
- Gladman agree with the Council in relation to past completions and the fact they should be taken into consideration when calculating the housing land supply. The methodology used in method 2 of the BR1 factors in past completions, however it does not factor in the generosity level, which as stated, ensures a generous supply for housing land is provided.

#### Barratt Homes West (511/3)

- LDPs can allocate land in excess of SDP targets and there is clear justification in this case, particularly to address the issue of affordability and the geographical spread of sites to include the Lavern Valley.

#### **Modifications sought by those submitting representations:**

#### Persimmon Homes (382/2) (384/2) (397/7)

- Requirement to allocate further residential sites to fulfil the strategic objectives of the plan.
- Requirement to provide evidence of the housing supply at HSMA level.

#### Miller Homes (463/7), Cala Homes (West) (464/7), Wallace Land Investments (489/8), Avant Homes (504/7)

- Recommend the following revisions:  
 Para 1: To deliver housing needs across all tenures up-to ~~2029-2031~~ the Proposed Plan provides a range and choice of housing sites and supports the delivery of sustainable mixed communities. Provision ~~is~~ *should be* made for a ~~minimum of 4350 homes~~ *the housing land requirements set out in Table 1* and associated infrastructure to be delivered between 2012 ~~-2029-2031~~ to comply with the ~~Clydeplan Housing Land Requirements~~ and in accordance with Strategic Policy 1.  
 Para 2: The land supply will be monitored annually through the Housing Land Audit, ~~Housing Trajectory and the Action Programme~~. Sites will be subject to phased release to ensure that a minimum of a 5 year ~~continuous~~ effective land supply is maintained at all times and to manage impact upon infrastructure and services.

Para 5: If the Housing Land Audit identifies a shortfall in the 5 year effective housing land supply, ~~and this cannot be addressed through the early release of sites within the established housing land supply,~~ the Council will only consider housing proposals which:

- Are consistent with Strategic Policy 1, Policy D1 and Policy 8 and Diagram 10 of Clydeplan ~~with preference for brownfield sites within the urban areas. Sites within the green belt will only be considered where it has been demonstrated that a suitable site does not exist within the urban area and where all other criteria can be met. Proposals will be required to provide a defensible green belt boundary;~~
- Are ~~appropriate to the scale in keeping and~~ *with the* character of the specific settlement and local area;
- ~~Demonstrate positive social, economic and environmental benefits;~~
- ~~Would not prejudice delivery of allocated housing sites listed in Schedule 15;~~
- Are effective and capable of delivering completions in the next 5 years as demonstrated through supporting evidence in accordance with PAN 2/2010. Details of the phasing of development is required to be submitted with any application; and
- Can provide the required infrastructure resulting from development in accordance with Strategic Policy 2. Where infrastructure constraints cannot be overcome, including impacts upon education infrastructure, proposals will not be supported.

Miller Homes (463/4), Cala Homes (West) (464/5), Wallace Land Investments (489/6), Avant Homes (504/5)

Page 93: How Many New Homes are Needed by ~~2029~~ 2031?

In preparing LDP2 the Housing Land Requirements for each Local Authority across the Clydeplan region have been reassessed. A revised Strategic Housing Need and Demand Assessment (HNDA 2015) provides housing estimates up to 2029 for each Local Authority. From these estimates Housing Supply Targets (HSTs) have been prepared. These targets are also set out in the Council's Local Housing Strategy (LHS).

To accord with Scottish Planning Policy (SPP), 15% generosity has then been added to the HSTs at the Clydeplan level to produce the Housing Land Requirement for each Local Authority and *each Housing Sub-Market Area*. The outcomes of this assessment replace the current housing targets set out in Strategic Development Plan 1 (SDP1) and LDP1. Our requirements are set out in Table 1 (~~4350 units 2012-29~~).

The Proposed Plan is ~~also~~ required to ensure that a ~~continuous~~ 5 year effective housing land supply is maintained throughout the plan period ~~and to as well as~~ allocate land on a range of sites which ~~is~~ are effective up to year 10 from the predicted year of adoption to ~~ensure that meet the housing land requirements of Clydeplan Scottish Planning Policy (SPP) are met in full.~~ Further information is set out in the Housing Background Report.

Delete Table 1 and replace as follows:

	2012-2024	2024-2029	2029-2031
Local Authority All Tenure Housing land Requirement	3230	1120	513



Local Authority Private Sector Housing land Requirement	2610	860	409
Renfrewshire HSMA Private Sector Housing land Requirement	8160	2030	1199
Greater Glasgow South HSMA Private Sector Housing Land Requirement	9330	3060	1458

#### Housing Supply, Delivery and Phasing page 94

The Background Report and Table 2 clearly show that there ~~is~~ *may be* a sufficient land supply to meet the Housing Land Requirement of Clydeplan by ~~2029~~ 2031. The Background Report ~~also clearly demonstrates~~ *that there may be* a generous 5 year effective land supply and a 10 year land supply in accordance with SPP. Furthermore, as referred to under the Development Strategy and Education section of this Proposed Plan, considerable detailed research and analysis has been undertaken to inform long term planning of educational infrastructure and requirements. This analysis has shown that further housing releases ~~would~~ *may* have ~~major~~ impacts upon the existing education and health infrastructure ~~and as the Plan provides a generous housing land supply, no further housing sites are identified for release in this Proposed Plan.~~

**Table 2: Monitoring of Housing Land Supply 2012-2031**

	Local Authority		Renfrewshire HSMA	GGs HSMA
	All Tenure	Private	Private	Private
a) Housing Land Requirement (HLR)	4863	3879	11389	13848
b) Completions 2012-19	1812	1507	TBC	TBC
c) Established Housing Land Supply 2019-31	3194	2805	TBC	TBC
d) Total (c+d)	5006	4312	TBC	TBC
e) Surplus/Deficit with HLR (d-a)	+143	+433	TBC	TBC

Homes For Scotland (476/10), Robertson Homes (495/8)

- Tables 1 and 2:
  - Include an adjustment to the HLR so that it covers the period to 2031 (2 more years) to ensure the HLR runs for 10 years from the anticipated date of adoption in accordance with SPP para. 119.
  - Set out the Housing Land Requirements for each Housing Sub Market Area (HSMA), adjusted to extend to 2031. The adequacy of the supply should then be assessed. East Renfrewshire includes parts of both the Renfrewshire and Greater Glasgow South HSMA.
  - Consequential changes are also required to the table shown on page 95 to extend the HLR to 2031 by increasing the current HLR on an annual average pro-rated basis.
- Demonstrate that adequate land supply exists in the two HSMA's.

Scottish Government (486/5)

- The plan should set out the housing supply target (separated into affordable and market sector) and the housing land requirement for each functional housing market area in the plan area for the plan period.

Gladman Developments Ltd (503/3) (503/4) (571/4)

- A robust review of the effectiveness of sites included within the plan should be carried out to ensure their effectiveness and suitability as housing land allocations for the forthcoming plan period.
- The Plan should allocate an appropriate amount of housing land to meet requirements within the Levern Valley HMA and also to alleviate pressures within the Eastwood Housing Market Area.
- East Renfrewshire should promote higher levels of allocations to contribute to alleviating acknowledged issues.
- East Renfrewshire should Increase the quantity of housing sites under Policy SG1 and associated Schedule 15 of the Proposed Plan.

**Summary of responses (including reasons) by planning authority:**

The Council's response to the representations received to this issue are broken down into the following subheadings: General; Development Strategy; Housing Supply Targets and Requirements; Housing land Supply; 5 year land supply; Housing Sub- Market Areas; Policy SG1; Levern Valley; Housing Mix and Affordable Housing; and Economic Benefits of Housebuilding.

**General**

- Various objections questioned the Development Strategy and the failure to allocate additional housing sites in the Proposed Plan. It was suggested that there was justification in allocating additional sites to address affordability issues and that Clydeplan sets minimum targets that can be exceeded. Representations also queried whether the Proposed Plan met in full the housing requirements of Clydeplan.

- The evidence to support this position is mainly set out in the Geddes 'Housing Land Supply' Statement. This position is supported and endorsed by a number of other representees. Gladman also provide analysis of the land supply position.
- Responses to specific site proposals are set out under Issues 15 to 27.

### **Development Strategy**

Persimmon Homes (382/2) (384/2) (397/7), Homes For Scotland (476/10), Mactaggart & Mickel (493/3), Robertson Homes (495/8), Gladman Developments Ltd (503/3) (503/4) (571/4)

- Scottish Planning Policy (SPP) (CD/@@) clearly states that *“Planning should direct the right development to the right place”*. To do this, para 40 of SPP states that development plans require to promote a sustainable pattern of development appropriate to the area and sets out a series of principles which should be used to guide decisions.
- The Proposed Plan promotes a strategy of regeneration and consolidation of the urban areas and the enhancement of existing places in line with Option 2B of the MIR (CD/@@). A key objective of the Proposed LDP2 is to plan for the sustainable and inclusive economic growth of the area in accordance with SPP. This approach is in line with the 'compact city' approach and vision set out in the approved Strategic Development Plan 'Clydeplan' (2017) (CD/@@).
- Para 119 of SPP states that Local Development Plan's *'should allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected date of adoption. They should provide for a minimum of 5 years effective land supply at all times'*. The Council is in agreement with representees that the Proposed Plan should set out housing requirements to 2031. Further information on this matter and the Plan's Development Strategy is set out under Issue 2.
- The Council has clearly evidenced the strategic approach taken for the Proposed Plan and its approach to current and future education provision and mitigation in the Education Background Report (BR4) (CD/@@) and other Council Reports. The long term strategic analysis undertaken has clearly shown that further housing releases would have major impacts upon the existing education infrastructure across all sectors and both the Leven Valley and Eastwood areas and that there is no viable solution to provide sufficient additional education places to accommodate the further housing releases as originally proposed in the LDP2 MIR. The Council has provided a detailed response on this matter under Issue 2 and 13 and acknowledges the need to continually monitor the demand for education places and address future education infrastructure requirements.
- As a result of the educational analysis and the fact that the Proposed Plan already provides a generous supply of land, no new housing sites were identified for release.
- Delivery of the Proposed Plan's development strategy and housing requirements will be achieved through a continued focus upon development within the urban areas, together with the established housing sites within the land supply (including the three master plan areas, Policies M2.1, M2.2 and M3). The Proposed Plan clearly provides a range and choice of location across both the Levern Valley and Eastwood areas.
- The strategic housing analysis and monitoring, as shown in the Housing Background Report (BR1) (CD/@@) and its revision (CD/@@), clearly

demonstrate that the Proposed Plan will meet and also exceed the private and social rented housing targets and requirements of Clydeplan by 2031 and provide a continuous 5 year effective land supply.

- There is therefore no numerical or other policy requirement for the allocation of additional sites. As set out under Issues 20 to 27 there has been a range of alternative housing locations promoted. The Council is of the view that allowing additional new housing sites in the green belt would be contrary to the vision and strategy of the Proposed Plan, and would direct development away from the strategic master planned areas and other urban housing sites.
- It is worth noting that the Geddes Report (Para 1.6) clearly states *“that there may be marginal surplus in the established housing land supply required to meet the all tenure housing land requirement and private sector housing land requirement in full over the periods of the approved Clydeplan SDP. It is expected that the proposed development strategy will maintain a five year effective housing land supply at all times”*. This message is referred to again under Para 4.34. It is therefore clear that the Geddes Report acknowledges that the Proposed Plan will meet the requirements of Clydeplan and no additional housing allocations are required.
- The Council is of the view that the development strategy and supporting policies and proposals provide a strong framework that will achieve the three spatial objectives of the Plan; that the strategy for the allocation of housing land is in full conformity with the requirements of SPP and Clydeplan; and that the sites allocated for residential use are considered to be effective and deliverable within the plan period and will meet the housing land requirement in full.
- The Council would also point out that the Proposed Plan fully accords with the Local Outcome Delivery Plan (CD/@@) and contributes to the delivery of the Council's strategic priorities though the provision of a generous housing land supply and also by seeking to maximise affordable housing options, contrary to the views expressed by Geddes Consulting.

### **Housing Supply Targets and Requirements**

Persimmon Homes (382/2) (384/2) (397/7), Miller Homes (463/4), Cala Homes (West) (464/5), Homes For Scotland (476/10), Mactaggart & Mickel (493/3), Robertson Homes (495/8), Wallace Land Investments (489/6), Gladman Developments Ltd (503/3) (503/4), Avant Homes (504/5)

- SPP states in Para 115 that Development Plans *‘should set out the housing supply target (separated into affordable and market sector) for each functional housing market area based on evidence from the HNDA,’* and Para 116 states that *‘this figure should be increased by a margin of 10 to 20% to establish the housing land requirement’*.
- Clydeplan is informed by a ‘robust and credible’ Housing Need and Demand Assessment (HNDA 2015) (CD/@@) in compliance with Para 113 of SPP, aligned with a policy view to the establishment of the housing supply target (HST) and housing land requirement (HLR) over two time periods, namely 2012 to 2024 and 2024 to 2029. In line with SPP, Clydeplan sets out the private and social housing supply target and housing land requirement for the East Renfrewshire local authority area, and the private housing land requirement for the wider housing sub-market areas (HSMAs). Clydeplan does not show the proportionate private housing land requirement by Local Authority area for each HSMA.
- To accord with SPP 15% generosity has been added to the HSTs at the Clydeplan level to produce the HLR. Clydeplan has been examined and this was accepted by

the Reporter(s) during the Examination of the Plan. It is considered that this meets the requirement of SPP, in accordance with para 116.

- In order to accord with Clydeplan the Council are required to ensure that they have enough housing land to:
  - meet the All Tenure Housing Supply Targets (Schedule 7) of 3790;
  - meet the All Tenure housing land requirement (Schedule 8) of 4350;
  - contribute to the private housing land requirements (Schedule 9) for each relevant HSMA (Renfrewshire HMSA of 10190 and Greater Glasgow South HMSA of 12390) . (This requirement is explained in more detail below); and
  - meet the private housing land requirement (Schedule 10) of 3470.
- The Council acknowledges that in order to provide a 10 year supply of land from the anticipated year of adoption (i.e. 2021) and to accord with Para 119 of SPP the HSTs and HLR need to be updated to reflect the period 2021 to 2031.
- As Clydeplan only provides figures up-to 2029 the Council has extrapolated the 2024 to 2029 HST and HLR figures for an additional 2 years.
- Para 2.22 of the Geddes Report recommends that the all tenure housing land requirement for 2029 to 2031 should be estimated using an average of the 17 year housing supply target figure (2012 to 2029) and then applying the 15% generosity (the all tenure HST  $3790/17 = 223 * 2 \text{ years} + 15\%$  giving an all tenure HLR 2029 to 2031 of 513).
- The Council disagrees with the methodology proposed in the Geddes Report and is of the opinion that a more appropriate approach would be to use an average of the 5 year housing supply target figure (2024 to 2029) and then apply the 15% generosity (the all tenure HST  $980/5 = 196 * 2 \text{ years} + 15\%$  giving an all tenure HLR 2029 to 2031 of 451). The same methodology should be applied to calculating the private and social rented sector HLR for the same period.
- On this basis the Council is supportive of the following modification.  
Table 1 should be deleted and amended as follows:

**Table 1: Housing Supply Targets and Housing Land Requirement 2012 to 2031**

	Housing Supply Targets (HST)			Housing Land Requirement (HLR)		
	2012-24	2024-31*	Total 2012-31	2012-24	2024-31**	Total 2012-31
<b>Private Sector</b>	2270	1050	3320	2610	1205	3815
<b>Social Sector</b>	540	322	862	620	366	986
<b>All Tenure</b>	2810	1372	4182	3230	1571	4801

Source: Clydeplan and ERC

**Notes to Table 1:**

*Housing Supply Targets (HSTs) (2012 to 2024 and 2024 to 2029) (Schedule 7 Clydeplan)*

*Housing Land Requirement (HLR) (HSTs +15% generosity) (2012 to 2024 and 2024 to 2029) (Schedule 8 Clydeplan)*

*\* Includes HST 2029 to 2031: (Per annum figure Schedule 7 2024-29  $980/5 = 196$ ) 2029-31:  $196*2 = 392$*

**\*\* Includes HLR 2029 to 2031: 2029-31: HST +15% = 451**

### **Housing Land Supply to 2031**

Persimmon Homes (382/2) (384/2) (397/7), Homes For Scotland (476/10), Mactaggart & Mickel (493/3), Robertson Homes (495/8), Gladman Developments Ltd (503/3) (503/4) (571/4)

- Para 3.25 of the Geddes Report suggested that the Proposed Plan and BR1 did not demonstrate programming post 2026 and therefore does not clearly show that the housing land supply is sufficient to meet the housing land requirement in full by 2031. Anticipated programming has been suggested in Appendix 1 of the Geddes report.
- Para 4.14 of the Geddes Report states that *“the Council has asserted that 827 all tenure homes will be completed between 2026 and 2029. This figure is unsubstantiated”*. Geddes go on to state that *“The Housing Land Audit 2019 confirms that only 557 all tenure homes will be completed over this period ....’ i.e. the period 2025/26 to 2028/29”*. For clarity this is Geddes assumption, not the Council’s and these figures are not demonstrated in the 2019 Housing Land Audit as Geddes suggest.
- The Council disagrees with these statements. Although the Proposed Plan and BR1 did not set out year by year programming, Schedule 15 of the Proposed Plan sets out the programmed land supply for each allocated housing site for the periods 2019 to 2029 and also identifies remaining capacity Post 2029. This information is reflected in BR1.
- As stated above the Council recognises the need to set out programming up to 2031 (i.e. 10 years from the date of adoption). Individual site programming up-to 2031 has been set out within the revised BR1 to reflect this requirement. It is also recommended that Schedule 15 be updated to reflect programming up to 2031 and post 2031.
- It is worth noting that the 2019 Housing Land Audit has been agreed with Homes for Scotland with no disputes, a position supported by Para 3.8 of the Geddes Report. Therefore the Council and Homes for Scotland and its members are in agreement about the effectiveness of sites and their programming up-to 2026. The Council and Homes for Scotland are also in agreement with housing completions during the period 2012 to 2019 as set out in Para 3.13 of the Geddes Report.
- The Geddes Report makes the assumption that the remaining capacity of sites programmed and effective up-to 2026 should continue post 2026 (Para 3.26). The Council agrees with this assumption. The report goes on to state that those sites not effective up-to 2026 will continue to be non-effective. Para 3.28 states that 647 all tenure homes are expected to be completed between 2026 to 2031. The Geddes approach assumes that only 129 homes will be built per annum (647/5) during this 5 year period. In comparison, the current build rate is 259 homes per annum during the period 2012 to 2019 i.e. double the rate Geddes calculate for the remainder of the plan period.
- The Council therefore strongly disagrees with these assumptions and the completion figures Geddes have identified for the period 2026 to 2031. These statements are made with no evidence provided to support them and therefore appear without any basis. The Geddes approach fails to acknowledge, for example, later phases of master plan sites which are currently under construction. This is a significant omission.

- The Council considers that the post 2026 programming shown within the revised BR1 is realistic and deliverable. BR1 clearly shows that 989 homes will be built during this period (2026 to 2031) at an average rate of 198 per annum. However this annual rate should still be considered conservative, as although there is a reduction in programming for the later part of the 2024 to 2031 period whilst existing sites are built out, there will inevitably be additions to the land supply before 2031, through windfall sites and potential new housing allocations in future LDPs. Such additions will increase levels of programming over later years of the plan period.
- Paras 4.28 and 4.29 of the Geddes Report provide an assessment of the current housing land supply against the all tenure HLR, and concludes there is a surplus of 122 units by 2031. The Council's figures indicate a surplus of 547 units. The table below summarises the information provided by the Geddes Report against the Council's information and is updated to reflect the 2024 to 2031 period.

### All Tenure Housing Land Requirement 2012 to 2031

	ERC			Geddes Report		
	2012-2024	2024-2031	Total 2012-2031	2012-2024	2024-2031	Total 2012-2031
<b>(a) HLR</b>	3230	1571	4801	3251*	1633	4884*
<b>(b) Completions 2012 to 2019</b>	1812	0	1812	1812	0	1812
<b>(c) Housing Land Supply</b>	1954	1582	3536	1954	1240	3194
<b>(d) Total (b+c)</b>	3766	1582	5348	3766	1240	5006
<b>(e) Surplus or Shortfall (d-a)</b>	+536	+11	+547	+515	-393	+122

*\*Includes the addition of 21 Social Rented Demolitions 2012 to 2019*

- All of the 21 demolitions referred to in the Geddes Report (Paras 3.29 to 3.39) were non Local Authority and have been taken out of housing use. The properties concerned were vacant and their demolition does not generate any need for replacement stock. Demolitions are also taken into account during the Housing Land Audit process. It is therefore incorrect to add this figure to the all tenure HLR. In addition it is worth noting that the Geddes Report does not include demolitions in their proposed revised Table 2 (shown in the modifications section above) which shows an all tenure surplus of 143 by 2031.
- Para 4.30 of the Geddes Report provides an assessment of the current private housing land supply against the HLR, and concludes that there is a surplus of 433 units by 2031. The Council's figures indicate a surplus of 744 units. The table below summarises the information provided by the Geddes Report against the Council's information.

**Private Housing Land Requirement 2012 to 2031**

	ERC			Geddes Report		
	2012-2024	2024-2031	Total 2012-2031	2012-2024	2024-2031	Total 2012-2031
(a) HLR	2610	1205	3815	2610	1269	3879
(b) Completions 2012 to 2019	1507	0	1507	1507	0	1507
(c) Housing Land Supply	1608	1444	3052	1608	1197	2805
(d) Total (b+c)	3115	1444	4559	3115	1197	4312
(e) Surplus or Shortfall (d-a)	+505	+239	+744	+505	-72	+433

- Both the Geddes Report analysis and the Council's figures clearly show a large surplus for both the all tenure and private sectors by 2031 and will meet the requirements of Schedules 8 and 10 of Clydeplan, although Geddes incorrectly identify a shortfall in the 2024 to 2031 period.
- As stated above and to ensure the Proposed Plan allocates sufficient land to meet the housing supply targets and land requirement up-to 2031, Table 2 should be revised. Table 2 clearly demonstrates an all tenure and private surplus up to 2031 in accordance with Clydeplan and SPP.
- On this basis the Council is supportive of the following modifications. Table 2 should be deleted and amended as follows:

**Table 2: Monitoring of Housing Land Supply 2012-2031**

	Private Sector	Social Sector	All Tenure
(a) Housing Supply Targets (HST)	3320	862	4182
(b) Housing Land Requirement (HLR)	3815	986	4801
(c) Completions 2012-2019	1507	305	1812
(d) Established Land Supply 2019-2031	2833	703	3536
(e) Total (c+d)	4340	1008	5348
(f) Surplus/Deficit with HST (e-a)	+1020	+146	+1167
(g) Surplus/Deficit with HLR (e-b)	+525	+22	+547

Source: Clydeplan (2017) and ERC Housing Land Audit (2019)

**Notes to Table 2:**

(a) Housing Supply Targets (Schedule 7 Clydeplan)

(b) Housing Land Requirement (HSTs +15% generosity) (Schedule 8 Clydeplan)



*(d) Established land supply as agreed with Homes for Scotland through the annual Housing Land Audit. This comprises those sites deemed effective during the period 2019 to 2026 and programming of sites 2026 to 2031.*

*\* Comprises sites allocated for 100% SR/BMR under schedule 16 and where SR/BMR capacity known for sites with planning consent. Where a site does not have a current planning consent an assessment has been undertaken to identify the potential affordable provision. However until consent is granted, it is not always possible to confirm the affordable tenure and therefore this figure may change, although the total all tenure supply remains unchanged.*

Schedule 15 should be modified to reflect the programming set out in the revised BR1 with the column headings modified as follows (*revised text in italics*):

### **Schedule 15: Housing Sites**

<b>Site Ref</b>	<b>Location</b>	<b>Housing market Area (HMA)</b>	<b>Type</b>	<b>Remaining Capacity</b>	<b>Established Land Supply <del>2019-29</del> 2019 to 2031</b>	<b>Land Supply Post <del>2029</del> 2031</b>	<b>Notes</b>

### **Housing Sub-Market Areas**

Persimmon Homes (382/2) (384/2) (397/7), Homes For Scotland (476/10), Scottish Government (486/5), Mactaggart & Mickel (493/3), Robertson Homes (495/8), Gladman Developments Ltd (503/3) (503/4) (571/4)

- A number of representations argued that the Proposed Plan was inconsistent with Clydeplan; does not demonstrate compliance with Policy 8 of Clydeplan; and that the Private Housing Land Requirements are required to be met at both Local Authority and the Housing Sub-Market Area (HMSA) geographies. It was stated that the Proposed Plan should set out the requirements for each HSMA and how these would be met within a modified Table 1 and 2 of the Plan.
- SPP states in para 115 that Development Plans '*should set out the housing supply target (separated into affordable and market sector) for each functional housing market area*'. Clydeplan sets out these requirements.
- In accordance with para 111 of SPP, the identification of the housing market areas and the consideration of housing requirements was undertaken as part of the Clydeplan and HNDA preparation process.
- Clydeplan sets the private housing land requirement for each Housing Market Area and HMSA in schedule 9. The Council consider that the Proposed Plan requires to address the private and social rented housing requirements for East Renfrewshire within its local authority area; and that the local authority's share of the private requirements should be addressed within the appropriate wider HSMA it falls within. The Council does not think it necessary to show monitoring against these wider HSMA requirements in the Proposed Plan. This approach was supported by the Reporter who examined the West Dunbartonshire LDP who concluded at Para 10

page 183 *“I do not consider that the plan itself need necessarily include tables demonstrating how the private housing land requirements of Schedule 9 of the strategic development plan have been met,....”*

- The East Renfrewshire Council local authority area is covered by two housing sub-market areas namely: the Renfrewshire HSMA, which comprises the entire Levern Valley part of East Renfrewshire, the whole of Renfrewshire, and parts of Inverclyde; and the Greater Glasgow South HSMA, which includes the entire Eastwood part of East Renfrewshire and parts of Glasgow City and South Lanarkshire Council local authority areas.
- Schedule 9 of Clydeplan clearly shows an indicative surplus in each of the HSMAs, including Renfrewshire (+1650) and Greater Glasgow South (+2090), based upon a 2013 HLA base position. As stated earlier, Clydeplan does not show the proportionate private housing land requirement by Local Authority area for the East Renfrewshire parts of the Renfrewshire or Greater Glasgow South Housing Sub Market Areas.
- It is accepted in the representations that the Proposed Plan focuses on the housing land supply and housing land requirement in relation to the East Renfrewshire local authority area, in compliance with Policy 8 of Clydeplan. However, to address the requirements related to the wider Renfrewshire and Greater Glasgow South HSMAs shown in Schedule 9 of Clydeplan, the Council has analysed monitoring data collated for Clydeplan.
- The following tables clearly demonstrate that the private housing land requirements will be met for both HSMAs by 2029 (Renfrewshire +830 and Greater Glasgow South +91). This is based upon the 2018 Housing Land Audits as the most up-to-date agreed housing supply position available across the various Council areas.

### **Greater Glasgow South HSMA**

	Total 2012-2029
(a) HLR	12390
(b) Completions (2012-2018)	4351
(c) Established Land Supply	8130
(d) Total (b+c)	12481
(e) Surplus/ Deficit (d-a)	+91

### **Renfrewshire HSMA**

	Total 2012-2029
(a) HLR	10190
(b) Completions (2012-2018)	3030
(c) Established Land Supply	7990
(d) Total (b+c)	11020
(e) Surplus/ Deficit (d-a)	+830

- It is also important to recognise that Inverclyde Council, Renfrewshire Council, Glasgow City, and South Lanarkshire Council are at various stages in their LDP cycles, and not all have an agreed 2019 Housing Land Audit position. It is also likely that there will be further additions to the land supply for each Local Authority through windfall sites and potential further LDP allocations which will increase levels of programming.

- The Council is of the view that the Proposed Plan is in compliance with Clydeplan and SPP and provides a generous housing land supply across all tenures in both the Eastwood and Levern Valley parts of East Renfrewshire, meeting both the overall all tenure Local Authority requirement and East Renfrewshire's share of the wider private HSMA requirements.
- The Council retains the view that monitoring of these wider HSMA targets is best achieved at the regional level through Clydeplan and the future Regional Spatial Strategy.

### **5 year land supply**

Persimmon Homes (382/2) (384/2) (397/7), Homes For Scotland (476/10), Mactaggart & Mickel (493/3), Robertson Homes (495/8), Gladman Developments Ltd (503/3) (503/4) (571/4)

- Objections were received to the Council's approach in calculating the 5 year land supply.
- Two methods were set out in BR1, the 'annualised' (Method 1) or 'compound' (Method 2). It is worth noting that the approach promoted through the Scottish Government's Planning Performance Framework Guidance uses the 'annualised' approach based upon the housing supply targets.
- While there are clear similarities between the 'compound' approach that the Council has applied and the representations received, in terms of accounting for the contribution of housing completions since 2012, the clear difference is that the Council's methodology uses the housing supply target as its starting point, rather than the housing land requirement. The Geddes Report disagrees with this approach and recommend using the housing land requirement for the 5 year calculations (Para 4.18).
- The Council is firmly of the view that the housing supply targets are the correct figures for calculating the effective five year supply. Using the housing supply targets approach was accepted in a recent Appeal Decision (PPA-260-2074 - Land north west of Leverndale Hospital, Crookston Road, Glasgow) (CD/@@) as the Reporter stated that *"any methodology applied to calculate the shortfall or surplus in the five year effective supply should use the housing supply target as its starting point, rather than the housing land requirement..."*(Para 6, Page 2).
- This approach was further endorsed by a further appeal PPA-320-2135 - Morningside Road, Morningside, Newmains, North Lanarkshire (CD/@@). The Reporter concluded at Para 21 and 22 that *'...while it is appropriate to use the 15% higher housing land requirement when allocating sites in an LDP so as to provide flexibility and guard against unforeseen problems with allocated sites coming forward, I do not regard it appropriate when setting a target for the effective five year supply as, for the identified output from a site to be part of that supply, there ought to be very little doubt that it will, in fact, come forward as expected. That being so, a target that was based upon the housing land requirement would impose an expectation to deliver more houses within the next five years than has been calculated to be required. Therefore, I conclude that the five year effective housing land supply target should use Clydeplan's housing supply target rather than its housing land requirement'*.
- BR1 clearly shows a continuous 5 year effective land supply for each period. The Council disagrees with the alternative approaches suggested by the representees.

### **Policy SG1: Housing Supply, Delivery and Phasing**

Miller Homes (463/7), Cala Homes (West) (464/7), Wallace Land Investments (489/8), Avant Homes (504/7)

- Various representations question the approach set-out in Policy SG1 in relation to the provisions for determination of applications for housing development in the case where a shortfall in housing land supply is identified.
- As referred to above one of the policy principles of SPP is that planning should direct development to the right place. It states that decisions should consider the re-use or redevelopment of brownfield land before new development takes place on greenfield sites (para 40). Para 5 Criterion 1 of Policy SG1 reflects this policy principle and clearly refers to the application of a sequential approach which gives priority to the use of brownfield sites.
- SPP in Para 123 is clear that a 5-year effective land supply requires to be maintained at all times. As demonstrated above and within BR1 there is currently a generous 5-year effective land supply in place. This position will be reviewed annually in preparing the Housing Land Audit, in consultation with Homes for Scotland. If a shortfall is identified during the period of the Plan, Policy SG1 of the Proposed Plan sets out criteria to be met. It is considered that this approach is in accordance with Clydeplan (Policy 8) and SPP.
- There is no numerical requirement to allocate further sites for private housing as clearly demonstrated in the evidence presented to this Examination. If further proposals do come forward they can be assessed against Policy SG1.
- The Council disagrees with the proposed amendments to Policy SG1. The suggested modifications would substantially weaken the Policy. However, to ensure the Proposed Plan clearly references the Plan period to 2031 the following modifications are proposed (revised text in italics):
- Policy SG1 Para 1: To deliver housing needs across all tenures to ~~2029~~ 2031....sustainable mixed communities. Provision is made for ~~a minimum the housing land requirements set out in Table 1~~ and associated infrastructure to be delivered between ~~2012-2029~~ to 2031 to comply with ~~the Clydeplan Housing Land Requirements~~ and in accordance with Strategic Policy 1.
- Page 93: How Many New Homes are Needed by ~~2029~~ 2031?
- Para 2 Final Sentence: Our requirements are set out in Table 1 (~~4350 units 2012-29~~)
- Page 94: Housing Supply, Delivery and Phasing
- Para 1 1st Sentence: The Background Report and Table 2.....of Clydeplan by ~~2029~~ 2031.

### **Levern Valley**

Gladman Developments Ltd) (503/4), Barratt Homes West (511/3)

- Gladman queried whether the Proposed Plan would meet the private sector requirements in the Levern Valley Housing Market Area. The Levern Valley private Housing Land Requirement for 2012 to 2024 is 1070. Gladmans calculations show a deficit of 99 during this first period.

- The Council agrees that there is a small shortfall (-99) in the private sector for the 2012 to 2024 period. However, this shortfall will be addressed in the longer term with a surplus by 2031 (+164) as shown in the following table.

#### **Monitoring of Levern Valley Private Housing Land Supply 2012-2031**

	2012-24	2024-31	Total 2012-31
(a) Housing Supply Targets (HST)	930	633	1563
(b) Housing Land Requirement (HLR)	1070	728	1798
(c) Completions 2012-2019	183	0	183
(d) Established Land Supply 2019-2031	788	991	1779
(e) Total (c+d)	971	991	1962
(f) Surplus/Deficit with HST (e-a)	+41	+358	+399
(g) Surplus/Deficit with HLR (e-b)	-99	+263	+164

- The Council accepts that rates of housing delivery since 2012 across the Levern Valley have been lower than the Eastwood area. This can be attributed to a slower rate of delivery at the Barrhead South master plan area (M2.2) and at the Barrhead North master plan area (Policy M3 – in particular the Shanks site (SG1.10)) than originally programmed. This is largely due to overcoming infrastructure and land ownership constraints. However, a number of sites within the wider Barrhead South master plan area are now under construction or have planning consent and are/will be delivering completions in the short to medium term. A planning application has been agreed at the Shanks Park site subject to Section 75 agreement and 2 further sites at Blackbyres Road, Barrhead (SG1.12 and SG1.13) are currently under construction. Furthermore a site in Neilston (SG1.19) is also well advanced. These sites will deliver completions in the short term.
- The programming for the Barrhead North and South master plan areas and other sites within the Levern Valley area have been agreed by Homes for Scotland, of which Gladman is a member. No disputes were raised to these sites during the audit process.
- Various representations stated that there was available capacity within the Education estate in the Levern Valley side of the authority that could accommodate pupils arising from new residential sites (Issue 20 Submitted Housing Supply Barrhead), Issue 25 (Submitted Housing Supply Neilston) and Issue 26 Submitted Housing Supply Uplawmoor).
- However, the Council has clearly demonstrated under Issue 2 and 13 that this is an inaccurate assumption. The existing schools will support LDP1 and approved windfall development, however additional housing would cause capacity problems within the school estate in Levern Valley.
- The Council will continue to monitor the impact of new development on the school estate in the Levern Valley sub area.

### **Housing Mix and Affordable Housing**

Persimmon Homes (382/2) (384/2) (397/7), Homes For Scotland (476/10), Mactaggart & Mickel (493/3), Robertson Homes (495/8), Gladman Developments Ltd (503/3) (503/4) (571/4)

- The Proposed Plan supports the Council's Local Housing Strategy (2017-22) (CD/@@) and Strategic Housing Investment Plan (CD/@@) to maximise the supply of affordable homes across East Renfrewshire and will support development proposals that provide a mix of housing types and tenures to meet current and future housing needs.
- The Council maintains that the Proposed Plan (through Strategic Policy 1, Policy SG1, SG2 and SG4) provides a generous land supply with a range and choice of housing sites. This will deliver housing to meet needs across all tenures throughout the Plan period and will provide sustainable mixed communities and places in accordance with Para 122 of SPP and Clydeplan. The modifications to Table 2 shown above clearly demonstrate that the private and social rented targets and requirements will be met by 2031.
- It does not necessarily follow that the allocation of additional private residential sites is the only way in which the affordable demand may be met. The Council has a strong record of delivering affordable homes of varying types and tenures, including shared equity, low cost home ownership, social rented housing and by securing commuted payments, all in accordance with PAN 2/2010: Affordable Housing and Housing Land Audits (CD/@@). In addition to new affordable homes that will be delivered as part of private housing sites, the Council's own house building programme will deliver new affordable housing for local communities and is a key priority during the plan period.
- The Council acknowledges that funding levels to deliver affordable housing are currently uncertain beyond 2021 (as identified in the Council's Strategic Housing Investment Plan) The Council will therefore continue to apply its established affordable housing policy approach to ensure the continued delivery of affordable homes of different types and tenures beyond 2021 and throughout the plan period.
- The Council therefore disagrees that the Proposed Plan strategy will fail to deliver the required levels of affordable housing over the plan period. Further information is set out under Issue 28.

### **Economic benefits of housebuilding**

Homes For Scotland (476/10), Mactaggart & Mickel (493/3), Robertson Homes (495/8)

- It was suggested that the Proposed Plan does not give due weight to the net economic benefits of housebuilding. The Council disagrees with this suggestion as it clearly states on page 107 'Promoting a Successful Economy' para 6 that *'Residential developments also 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'*.
- It is not proposed to modify the plan based upon the above.

**Summary**

In response to the representations raised the Council has been transparent and clearly explained and responded to the following points within this Schedule 4 document, and BR1:

- Justification for the Development Strategy;
- Demonstrated an effective 5 year land supply;
- Demonstrated a generous 10 year land supply to meet the All Tenure Housing Land Requirement by 2031;and
- Demonstrated that the Proposed Plan will meet the All Tenure housing land requirement (Schedule 8); contribute to the private housing land requirements (Schedule 9) for each relevant HSMA; and meet the private housing land requirement (Schedule 10) of Clydeplan.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue 15</b>	<b>Housing Supply Barrhead</b>	
<b>Development plan reference:</b>	<b>Policy SG1: Housing Supply, Delivery and Phasing</b>	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
Emma Holliday (10/1) David Reid (18/1) SEPA (492/4)		
<b>Provision of the development plan to which the issue relates:</b>	Schedule 15: Housing Sites Policy M3: Barrhead North –Strategic Development Opportunity – Shanks/Glasgow Road SG1.10 Shanks Park SG1.11 North Darnley Road Pages 42 to 43	
<b>Planning authority's summary of the representation(s):</b>		
<p><b><u>(a) Schedule 15 - Proposal SG1.10 Shanks Park</u></b></p> <p><b><u>Support</u></b></p> <p><u>SEPA (492/4)</u></p> <ul style="list-style-type: none"> <li>• Support for deculverting the Bridgebar Burn in site SG 1.10 Shanks Park.</li> </ul> <p><b><u>Objections</u></b></p> <p><u>David Reid (18/1)</u></p> <ul style="list-style-type: none"> <li>• The proposed housing development backs right onto the rear of property.</li> <li>• How close will the new house build be and whether there is any landscape buffer provision between the area directly behind representees property and the new housing project?</li> <li>• Will there be an access road for the new houses running parallel to representees property? In addition there are currently trees directly behind rear fence - will these be part of the landscaping project planned in this area?</li> <li>• Given the level of works that will be taking place representee is concerned about pest infestation into the Victoria Place area. There have been issues logged previously with regard to this when works have taken place in Shanks Park. What assurance can the council give regarding pest control plans to ensure that there is no risk to the residents in Victoria Place?</li> </ul> <p><b><u>(b) Schedule 15 - Proposal SG1.11 North Darnley Road</u></b></p> <p><u>Emma Holliday (10/1)</u></p>		



- Housing development would have an adverse impact on wild space and wildlife. Concern over density of housing within the town. Questions the need for more housing.

#### **Modifications sought by those submitting representations:**

##### **(b) Schedule 15 - Proposal SG1.11 North Darnley Road**

Emma Holliday (10/1)

- Removal of site Site SG1.11 from Schedule 15: Housing Sites.

#### **Summary of responses (including reasons) by planning authority:**

##### **(a) Schedule 15 - Proposal SG1.10 Shanks Park**

###### **Support**

SEPA (492/4)

- The Council acknowledges and welcomes the support for deculverting the burn within the Shanks site and will seek further discussion and advice from SEPA at the appropriate time.
- It is not proposed to modify the Plan based on the above.

###### **Objections**

- The site forms part of the Shanks/Glasgow Road master plan area under Policy M3. The site is a large brownfield former industrial area and forms an essential element of the future growth and regeneration of Barrhead.
- The site was allocated for residential development in the adopted LDP1 (CD/@@) for 400 units. This allocation has been carried forward to the Proposed Plan. The site is programmed in the short, medium and longer term and contributes to the effective and established land supply.
- A planning application has been agreed at the Shanks Park site subject to Section 75 agreement (CD/@@). The Council is of the opinion that the detailed matters raised in the representation will be dealt with through the Development Management process.
- It is not proposed to modify the Plan based on the above.

##### **(b) Schedule 15 - Proposal SG1.11 North Darnley Road**

- The site was allocated for residential development in the adopted LDP1 as safeguarded site post 2025 for 60 units and removed from the green belt. This allocation has been carried forward to the Proposed Plan. The site is programmed in the long term i.e. post 2031 and contributes to the established land supply.
- There is currently no proposal submitted for the site. The Council believes there are adequate policies in place to ensure biodiversity is protected. The site is adjacent to Local biodiversity site and development proposals will require under Policy D7 to undertake an ecological appraisal to ensure any adverse impacts on

species and habitats are identified. If adverse impacts are identified mitigation measures must be provided. The site lies adjacent to land designated as D4 Green Network, thereby requiring any development on the site to protect and enhance this network. The Council believes these measures are sufficient to address the concerns raised in the representation.

- It is not proposed to modify the Plan based on the above

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue 16</b>	<b>Housing Supply, Busby</b>	
<b>Development plan reference:</b>	<b>Policy SG1: Housing Supply, Delivery and Phasing</b>	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Catherine Doherty (3/1)  Raymond Doherty (4/1)  Darren Doherty (5/1)  Paul Doherty (6/1)</p>		
<b>Provision of the development plan to which the issue relates:</b>	<p>Schedule 16: Affordable Housing and Housing for Particular Needs.  SG4.2 – Easterton Avenue  Page 104</p>	
<b>Planning authority's summary of the representation(s):</b>		
<p><b><u>Proposal SG4.2: Easterton Avenue, Busby</u></b></p> <p><u>Catherine Doherty (3/1), Raymond Doherty (4/1), Darren Doherty (5/1), Paul Doherty (6/1)</u></p> <ul style="list-style-type: none"> <li>• Traffic implications (including parking, junction/access concerns).</li> <li>• Health concerns next to electricity sub-station</li> <li>• Loss farmland and wildlife.</li> <li>• Brownfield land on Main St. Busby to be developed in preference.</li> <li>• Health and education facilities at full capacity.</li> <li>• Increased crime</li> </ul>		
<b>Modifications sought by those submitting representations:</b>		
<p><b><u>Proposal SG4.2: Easterton Avenue, Busby</u></b></p> <p><u>Catherine Doherty (3/1), Raymond Doherty (4/1), Darren Doherty (5/1), Paul Doherty (6/1)</u></p> <ul style="list-style-type: none"> <li>• Remove SG4.2 from Schedule 16: Affordable Housing and Housing for Particular Needs and on the associated Proposals Map.</li> <li>• Re-designate the site as Green Belt under Policy D3.</li> </ul>		
<b>Summary of responses (including reasons) by planning authority:</b>		
<p><b><u>Proposal SG4.2: Easterton Avenue, Busby</u></b></p> <p><u>Catherine Doherty (3/1), Raymond Doherty (4/1), Darren Doherty (5/1), Paul Doherty (6/1)</u></p>		

- Objections were received arguing the case for the deletion of the site from the Proposed Plan and its unsuitability for housing.
- The Council is of the opinion that the detailed matters raised in the representation are best dealt with at the appropriate stage in the Development Management process and once detailed plans are submitted. The majority of site specific considerations were also considered at the examination of LDP1 and there is no material difference from the consideration of the site within the Proposed Plan.
- The Council disagrees with the suggestion that Site SG4.2 should be removed from Schedule 16. The site was previously allocated in the adopted LDP1 (CD/@@) for affordable housing (SG1.38) with the Green Belt designation retained until a suitable affordable housing development was implemented. This caveat has been included in in the Proposed Plan as set out within the notes to Schedule 16.
- The site could deliver approximately 20 affordable units for Busby and help meet the social housing needs of the area. It is programmed in the medium term (2024 to 2029) as shown in the detailed programing set out in the Housing Land Audit (2019) (CD/@@) and the Action Programme (CD/@@). Funding has not been assigned to the site in the latest Strategic Housing Investment Plan (CD/@@).
- There is a significant pressure for affordable housing throughout the Council area. The current Strategic HNDA (CD/@@) estimates that in East Renfrewshire there is a total need for 880 affordable homes during the period 2012 to 2029. It is therefore important that both the Local Housing Strategy (CD/@@) and the Proposed Plan continue to address this issue.
- The Council's view is that Site SG4.2 should remain as an allocated housing site in Schedule 16 and that the greenbelt designation be retained until an appropriate affordable housing development is implemented.
- Representations were also submitted for a larger adjacent site (LDP2-22 Taylor Wimpey 497/1). This is addressed under Issue 21 which recommends that this larger site should also continue to be allocated as Green Belt.
- It is not proposed to modify the Plan based upon the above.

**Reporter's conclusions:**
**Reporter's recommendations:**

<b>Issue 17</b>	<b>Housing Supply Giffnock</b>	
<b>Development plan reference:</b>	<b>Policy SG1: Housing Supply, Delivery and Phasing</b>	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
Hazel Smyth (1/1) Mactaggart & Mickel (461/1) SEPA (492/7)		
<b>Provision of the development plan to which the issue relates:</b>	Schedule 15: Housing Sites Schedule 16: Affordable Housing and Housing for Particular Needs. SG1.21 Robslee Drive SG2.4 Burnfield Road Giffnock	
<b>Planning authority's summary of the representation(s):</b>		
<p><b><u>(a) Schedule 15 - Proposal SG1.21 Robslee Drive</u></b></p> <p><u>Mactaggart &amp; Mickel (461/1)</u></p> <ul style="list-style-type: none"> <li>• The site is allocated for residential development in the adopted LDP under site ref. SG1.15. Mac&amp;Mic continue to support the allocation of the site for residential development under site ref. SG1.15 in the Proposed LDP2.</li> <li>• Remain committed to bringing forward a planning application for residential development over this site as soon as possible.</li> <li>• It is essential that the SG1.15 site be extended in order to not prejudice the planning application process and the ability to optimise residential development of this brownfield site.</li> <li>• Extending the definition of the allocated site to its boundaries with the cemetery, railway line and neighbouring residential areas will more accurately reflect the natural boundaries and edges of the site and extending the allocation can help facilitate and ensure that residential development here can be optimised.</li> <li>• The allocation, as currently defined on the LDP2 Proposals Map, potentially constrains the ability to address flooding, drainage and other matters in the most appropriate manner. Whilst not all of the land here may be able to accommodate development it may all require to be within the application site boundary to help facilitate the delivery of the residential development i.e. it may be required for compensatory flood storage, open space etc. Flooding and drainage matters are currently under investigation.</li> <li>• Widening the delineation of the allocated site will not prejudice the full consideration of all issues through the planning application process, and so there is no reason for not extending the site as requested by this representation.</li> </ul> <p><u>SEPA (492/7)</u></p> <ul style="list-style-type: none"> <li>• It is noted that the proposed allocation has increased from 60 dwellings to 126. A substantial part of the site may lie within the 1 in 200 year floodplain. No</li> </ul>		

development should take place within this area. A Flood Risk Assessment is required to accompany planning applications at this site.

- A surface water flood hazard has been identified and should be discussed with the flood risk management authority and Scottish Water. Appropriate surface water management measures should be adopted.

**(b) Schedule 15 - SG2.4 Burnfield Road Giffnock**

Hazel Smyth (1/1)

- The Policy extent of SG4.4 Area needs to be redrawn excluding representees ownership.
- Object due to potential noise, traffic, pollution, potential oversteering or blocking.

**Modifications sought by those submitting representations:**

**(a) Schedule 15 - Proposal SG1.21 Robslee Drive**

Mactaggart & Mickel (461/1)

- The SG1.15 allocation, as defined on the Proposals Map of the Proposed Plan should be extended to include the full extent of site CS030, as considered and defined in the Council's Site Evaluation report document.

**(b) Schedule 15 - SG2.4 Burnfield Road Giffnock**

Hazel Smyth (1/1)

- Redraw the boundary of site SG4.4 to reflect ownership boundary.
- Remove SG4.4 from Schedule 16: Affordable Housing and Housing for Particular Needs and on the on the associated Proposals Map.

**Summary of responses (including reasons) by planning authority:**

**(a) Schedule 15 - Proposal SG1.21 Robslee Drive**

Mctaggart & Mickel (461/1), SEPA (492/7)

- The Council disagrees with the suggestion that the site boundary should be extended onto the area identified as flood plain. The site boundary has been carefully drawn to avoid those areas identified by SEPA as at risk from flooding and reflects the modification proposed by the Reporter at the LDP1 examination (CD/@@).
- The Proposed Plan and 2019 Housing Land Audit (HLA) (CD/@@) indicates a notional capacity of 126 units which reflects ongoing discussions with Mactaggart & Mickel.
- The Council notes the objections submitted on grounds of flood risk and SEPA's objection that the site falls entirely within the 1:200 year flood plain. The Council acknowledges that the majority of the site falls within an area subject to a 1:200 year flood probability event. Schedule 15 acknowledges that a flood risk assessment (FRA) will be required. The Council believes that the application of Proposed Plan Policies E6: Water Environment, E7: Flooding and E8: Water

Management combined with a flood risk assessment provide a strong policy framework against which to assess any future planning proposal. A FRA will also identify the developable areas and appropriate mitigation measures. The comments of SEPA will also be fully taken into account in the decision making process.

- Future development proposals supported by a FRA will dictate the boundary of any developable area and appropriate mitigation.
- The Council acknowledges the points made by Mactaggart & Mickel regarding the awkward shape of the proposed allocation and how this may complicate the redline boundary of a future planning application. The Council agrees that the land on the flood plain could be used as open space, green infrastructure, or other uses permitted within flood areas. The Council recommends that this issue of the boundary is dealt with at the planning application stage with the submission of a holistic masterplan which integrates housing on the areas identified for housing in the Proposed Plan with green infrastructure and open space in the flood risk areas.
- The Council retains the view that the site remains a suitable housing site.
- It is not proposed to modify the Plan based upon the above.

#### **(b) Schedule 15 - SG2.4 Burnfield Road Giffnock**

##### Hazel Smyth (1/1)

- An objection was received arguing the case for the deletion of the site from the Proposed Plan and its unsuitability for housing.
- The Council is of the opinion that the detailed matters raised in the representation are best dealt with at the appropriate stage in the Development Management process and once detailed plans are submitted.
- The site was allocated for private housing in the adopted LDP under ref SG1.18. The site has been carried forward to the Proposed Plan but is now allocated for affordable housing.
- The site could deliver approximately 20 affordable units for Giffnock and help meet the social housing needs of the area. It is programmed in the medium term (2024 to 2029) as shown in the detailed programming set out in the Housing Land Audit and the Action Programme (CD/@@). Funding has not been assigned to the site in the latest Strategic Housing Investment Plan (CD/@@).
- There is a significant pressure for affordable housing throughout the Council area. The current Strategic HNDA (CD/@@) estimates that in East Renfrewshire there is a total need for 880 affordable homes during the period 2012-2029. It is therefore important that both the Local Housing Strategy (CD/@@) and the Proposed Plan continue to address this issue.
- The Council's view is that Site SG4.2 should remain as an allocated housing site in Schedule 16.
- It is recognised that the site is currently used for car storage. This is reflected in the notes to Schedule 16.
- It is not proposed to modify the Plan based on the above.
- The Council recognises the minor error in the mapping of the boundary of the site and recommends adjusting the boundary to reflect land ownership.
- In order to correct this error and provide clarity if the Reporter was so minded the Council would be supportive of adjusting the boundary as suggested in the representation. (Figure 1)

<b>Reporter's conclusions:</b>
<b>Reporter's recommendations:</b>



<b>Issue 18</b>	<b>Housing Supply Neilston</b>	
<b>Development plan reference:</b>	<b>Policy SG1: Housing Supply, Delivery and Phasing</b>	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p> SportScotland (7/1)  Marie Victoria Wood (59/1)  Karen Lappin (122/1) (122/2)  Thomas Guild (132/1)  Robert Mould (137/1)  Allan Paterson (203/1)  Joyce Wallace (207/1)  Ian Davidson (210/2)  John Scott (247/1)  Gary Lambie (259/1)  Andrew Whiteford (261/1)  Steven Galbraith (271/1) (271/2)  Mrs Susie Stewart (273/1)  Christopher Hearn (274/1)  Kevin Robertson (276/1)  Lewis Pollock (277/1)  Stephen Fox (279/1)  James Lawn (281/1)  Stephanie Lambie (282/1)  Maureen Lambie (283/1)  Ryan (285/1)  Martyn Robertson (287/1)  Allan Gray (288/1)  1st Neilston Boys Brigade (289/1)  Debi Ward (290/1)  Brian Tait (291/1)  lynsey McLaren (292/1)  Louise McAdam (293/1)  John O'Donnell (294/1)  Sonja Millar (295/1)  Eunan McColgan (296/1)  Natalie (297/1)  Sean Taylor (298/1)  Neil Wilson (299/1)  Hannah (300/1)  Mrs Fiona Taylor (301/1)  Elaine Ross (302/1)  Sarah Aird (303/1)  Anne Forrest (304/1) </p>		

Emma Murdoch (305/1)  
Matt Drennan (306/1)  
Sam (307/1)  
Rosslyn Taylor (309/1)  
John Taylor (310/1)  
Catriona Broadhurst (312/1)  
George Boyce (313/1)  
David Todd (315/1)  
Claire Whelan (316/1)  
Kim Allan (317/1)  
Andrew McIlroy (318/1)  
Lorraine McLaughlin (319/1)  
Thomas Guild (320/1)  
Karyn Shields (321/1)  
Karen Jardine (322/1)  
Colin Whiteford (323/1)  
John Shields (324/1)  
Kirsty Hutchinson (325/1)  
Helen Fergus (326/1)  
Jill Keys (328/1)  
Karen Guild (329/1)  
Jim Miller (330/1)  
Dawn Haddow (331/1)  
Gareth Toner (332/1)  
Nairn Manson (333/1)  
Karen McNaughton (334/1)  
Jonathan Turner (335/1)  
Amelia Henderson (339/1)  
Amelia Henderson (340/1)  
Helen Boyce (342/1)  
Joanne Gardner (343/1)  
William Bannister (344/1)  
Euan Walker (347/1)  
Lesley Finnigan (348/1)  
Suzanne Sinclair (349/1)  
Linda King (350/1)  
Alan Hay (351/1)  
Joan Waygood (352/1)  
Gordon Turnbull (353/1)  
Mrs Yvonne Parker (356/1)  
Irene Turnbull (357/1)  
Jean McGarvie (358/1)  
Heather Deane (359/1)  
Angeline McSorley (361/1)  
Gordon Kilburn (363/1)  
Nicola Peacock (364/1)  
Maria Parker (365/1)  
Thomas Sanderson (366/1)  
Jacqueline Drennan (367/1)  
Jacqueline Tait (368/1)  
Scott McMillan (369/1)  
David Scougall (370/1)

Kenneth Fulton (372/1)  
Lynn Mcnicol (373/1)  
Stephanie McInnes (374/1)  
Maura Rome (378/1)  
Anne MacLeod (379/1)  
William McLatchie (394/1)  
Margaret Pettigrew (396/1) (396/2) (396/3)  
Ian (408/1)  
Cecilia Garry (411/1)  
Robert Winning (412/1)  
Robert R. Cameron (424/1)  
Margaret Cameron (426/1)  
Jim Sheriff (442/1)  
Julie Kelly (450/1)  
Robert Dock (451/1)  
Neilston Juniors (452/1)  
Susan Mathers (453/1)  
Neilston Development Trust (454/1)  
Stuart Hamilton (465/1)  
SEPA (492/3)  
The Quad Neilston (508/1)  
Suzanne Sinclair (512/1)  
Rachel Ferguson (513/1)  
Arron Sinclair (514/1)  
R M Ferguson (515/1)  
A Ferguson (516/1)  
Stephen Queen (517/1)  
Sarah Queen (518/1)  
Ramis Ali (519/1)  
Colin McLeish (520/1)  
J Craig (521/1)  
Patsy Smith (522/1)  
D Gourlay (523/1)  
Jonathan Watson (524/1)  
Alan Price (525/1)  
Laura Gros (526/1)  
C Brenchley (527/1)  
Ronnie Burns (528/1)  
Agnieszka Matsiak (529/1)  
Jennifer Sommerville (530/1)  
Anne MacDonald (531/1)  
Niall Gibson (532/1)  
John Kennedy (533/1)  
Philomena Galsworthy (534/1)  
Helen Ross (535/1)  
Grzegorz Borowy (536/1)  
Christine Collins (537/1)  
N McAllistair (538/1)  
Nan Walker (539/1)  
Ryan Jeffrey (540/1)  
Alexis Noon (541/1)  
Dianne Milligan (542/1)

Dylan Watson (543/1)  
 George MacDonald (544/1)  
 Isabel McLeish (545/1)  
 William Droy (546/1)  
 Alan Milligan (547/1)  
 Jean Wils (548/1)  
 Grant Walker (549/1)  
 J Moore (550/1)  
 Brian Collins (551/1)  
 Colin MacBeth (552/1)  
 Daria Borowa (553/1)  
 William Ross (554/1)  
 Anne Kennedy (555/1)  
 Edna Hay (556/1)  
 Maureen Gibson (557/1)  
 Donna Stevenson (558/1)  
 Callum McMichael (559/1)  
 Margaret Burns (560/1)  
 Jack Henry (561/1)  
 Jean Laverty (562/1)  
 Janet McLean (563/1)  
 Catherine Droy (564/1)  
 Clark Gordon (565/1)  
 Ross McNally (566/1)  
 Margaret Kennedy (567/1)  
 Scott Jordan (568/1)  
 G Donnelly (569/1)  
 Kaleb Queer (570/1)

**Provision of the development plan to which the issue relates:**

Schedule 15: Housing Sites  
 SG1.16: Crofthead Mill  
 SG1.17: Neilston Juniors  
 SG1.18: Holehouse Brae  
 SG1.20: North Kirkton Road  
 Schedule 8: Community Facilities  
 D12.8: Kingston Playing Field

**Planning authority's summary of the representation(s):**

**(a) Schedule 15 - Proposal SG1.16: Crofthead Mill, Neilston**

SEPA (492/3)

- Site fully within the 1:200 year flood plain. A surface water flood hazard exists. A culvert runs under the site.

**(b) Schedule 15 - Proposal SG1.17: Neilston Juniors, Neilston and Schedule 8 - D12.8: Kingston Playing Field, Neilston**

SportScotland (7/1)

- Sport Scotland would consider proposal against (SPP and Policy D13).

- Site contains Neilston Juniors FC with a full grass pitch. Cross reference is made to East Renfrewshire Pitches Strategy, which identifies sites long-term aim as 'protect' and 'enhance'.

Karen Lappin (122/2)

- Support sports community hub at Kingston Playing Field, excepting Neilston Juniors relocation.

Steven Galbraith (271/2)

- Kingston Playing fields should be enhanced with Astro Turf Pitches.

Margaret Pettigrew (396/2)

- Given we already have a community sports hub in Brig o Lea stadium there is no need to tear up a green space in the middle of the village which is used by the local community.

**Summary of Common representations**

**Full list of representations are set out in Appendix 1. Summarised key points are set out below.**

Marie Victoria Wood (59/1), Karen Lappin (122/1), Thomas Guild (132/1), Robert Mould (137/1), Allan Paterson (203/1), Joyce Wallace (207/1), Ian Davidson (210/2), John Scott (247/1), Gary Lambie (259/1), Andrew Whiteford (261/1), Steven Galbraith (271/1), Mrs Susie Stewart (273/1), Christopher Hearn (274/1), Kevin Robertson (276/1), Lewis Pollock (277/1), Stephen Fox (279/1), James Lawn (281/1), Stephanie Lambie (282/1), Maureen Lambie (283/1), Ryan (285/1), Martyn Robertson (287/1), Allan Gray (288/1), 1st Neilston Boys Brigade (289/1), Debi Ward (290/1), Brian Tait (291/1), Lynsey McLaren (292/1), Louise McAdam (293/1), John O'Donnell (294/1), Sonja Millar (295/1), Eunan McColgan (296/1), Natalie (297/1), Sean Taylor (298/1), Neil Wilson (299/1), Hannah (300/1), Mrs Fiona Taylor (301/1), Elaine Ross (302/1), Sarah Aird (303/1), Anne Forrest (304/1), Emma Murdoch (305/1), Matt Drennan (306/1), Sam (307/1), Rosslyn Taylor (309/1), John Taylor (310/1), Catriona Broadhurst (312/1), George Boyce (313/1), David Todd (315/1), Claire Whelan (316/1), Kim Allan (317/1), Andrew McIlroy (318/1), Lorraine McLaughlin (319/1), Thomas Guild (320/1), Karyn Shields (321/1), Karen Jardine (322/1), Colin Whiteford (323/1), John Shields (324/1), Kirsty Hutchinson (325/1), Helen Fergus (326/1), Jill keys (328/1), Karen Guild (329/1), Jim Miller (330/1), Dawn Haddow (331/1), Gareth Toner (332/1), Nairn Manson (333/1), Karen McNaughton (334/1), Jonathan Turner (335/1), Amelia Henderson (339/1), Amelia Henderson (340/1), Helen Boyce (342/1), Joanne Gardner (343/1), William Bannister (344/1), Euan Walker (347/1), Lesley Finnigan (348/1), Suzanne Sinclair (349/1), Linda King (350/1), Alan Hay (351/1), Joan Waygood (352/1), Gordon Turnbull (353/1), Mrs Yvonne Parker (356/1), Irene Turnbull (357/1), Jean McGarvie (358/1), Heather Deane (359/1), Angeline McSorley (361/1), Gordon Kilburn (363/1), Nicola Peacock (364/1), Maria Parker (365/1), Thomas Sanderson (366/1), Jacqueline Drennan (367/1), Jacqueline Tait (368/1), Scott McMillan (369/1), David Scougall (370/1), Kenneth Fulton (372/1), Lynn Mcnicol (373/1), Stephanie McInnes (374/1), Maura Rome (378/1), Anne MacLeod (379/1), William McLatchie (394/1), Margaret Pettigrew (396/1), Ian (408/1), Cecilia Garry (411/1), Robert R. Cameron (424/1), Margaret Cameron (426/1), Jim Sheriff (442/1), Robert Dock (451/1), Neilston Juniors (452/1), Neilston Development Trust (454/1), Stuart Hamilton (465/1)

- Neilston Juniors active and important part of community life for over 70 yrs.
- Neilston Juniors received funding to improve sporting facilities
- Disagree with removal of Neilston Juniors stadium for housing
- Neilston Juniors signed lease with Council until 2045, with possibility of further extension.
- Club & ground an important part of Neilston's history.
- Loss of recreational facilities runs counter to Policy D13 protecting sports & football pitches.
- Village infrastructure (medical and schools) struggling to cope with existing population this housing site would worsen this.
- No need for housing as over target by (2029) in excess of 1300 houses (table2)
- Relocation to Kingston playing field would have an adverse impact on existing recently improved facilities.
- Football club having extended 25 lease extension spent monies improving facilities with further improvements (installation all weather pitch anticipated dependant on funding)
- Football club & stadium represent heart of community sports hub.
- Object to building 35 houses at the site.
- Land gifted to community for recreational purposes.
- The facility is well used, with over 200 members within Neilston Juniors Youth academy.
- Football clubs movement away from historical roots not proven successful nationally.
- Wish stadium (brig- O'lea) to remain as a community sports ground.
- Vital community asset should not be removed & kept as a public facility.
- Club provides long-term social & recreation benefits for young and old in community which far outweigh any short-term financial gain.

**(c) Schedule 15 - Proposal SG1.18: Holehouse Brae, Neilston**

Robert Winning (412/1)

- Where are the access roads to the site?
- How many houses are proposed?
- What is the housing mix?
- Where are social houses to be sited?

**(d) Schedule 15 - Proposal SG1.20: North Kirkton Road, Neilston**

Margaret Pettigrew (396/3)

- Not needed as there is enough housebuilding in the area already happening within the Barrhead and Neilston area for the foreseeable future and without any thought about how the community can cope with all the ancillary work that goes with it.

Julie Kelly (450/1)

- Identified site is contradictory; containing land covered by policy SG2.4 and Policy D3.
- Site is on land designated as greenbelt.
- Loss of recreational green space.

- Loss of biodiversity.
- Local road is not suitable for additional traffic and presents a health and safety risk.
- Pressure on schools, health facilities.
- Insufficient water supply.
- 800 objections to a planning application on this site.

#### Susan Mathers (453/1)

- The land is designated as greenbelt.
- Loss of biodiversity, cultural heritage.
- Local roads inadequate for development.
- Pressure on schools and medical facilities.
- There is sufficient housing supply.
- 750 residents have objected to planning application on this site.
- Objection to inclusion of MIR11 proposal in education Infrastructure section (40 units) on adjacent site.

#### **Common representations (Pro-forma)**

The Quad Neilston (508/1), Suzanne Sinclair (512/1), Rachel Ferguson (513/1), Arron Sinclair (514/1), R M Ferguson (515/1), A Ferguson (516/1), Stephen Queen (517/1), Sarah Queen (518/1), Ramis Ali (519/1), Colin McLeish (520/1), J Craig (521/1), Patsy Smith (522/1), D Gourlay (523/1), Jonathan Watson (524/1), Alan Price (525/1), Laura Gros (526/1), C Brenchley (527/1), Ronnie Burns (528/1), Agnieszka Matsiak (529/1), Jennifer Sommerville (530/1), Anne MacDonald (531/1), Niall Gibson (532/1), John Kennedy (533/1), Philomena Galsworthy (534/1), Helen Ross (535/1), Grzegorz Borowy (536/1), Christine Collins (537/1), N McAllistair (538/1), Nan Walker (539/1), Ryan Jeffrey (540/1), Alexis Noon (541/1), Dianne Milligan (542/1), Dylan Watson (543/1), George MacDonald (544/1), Isabel McLeish (545/1), William Droy (546/1), Alan Milligan (547/1), Jean Wilson (548/1), Grant Walker (549/1), J Moore (550/1), Brian Collins (551/1), Colin MacBeth (552/1), Daria Borowa (553/1), William Ross (554/1), Anne Kennedy (555/1), Edna Hay (556/1), Maureen Gibson (557/1), Donna Stevenson (558/1), Callum Mcmichael (559/1), Margaret Burns (560/1), Jack Henry (561/1), Jean Laverty (562/1), Janet McLean (563/1), Catherine Droy (564/1), Clark Gordon (565/1), Ross McInally (566/1), Margaret Kennedy (567/1), Scott Jordan (568/1), G Donnelly (569/1), Kaleb Queer (570/1)

- Contrary to the Neilston Infill Strategy which seeks to protect greenspaces.
- Contrary to LDP2 policy resisting the loss of open space that has significant amenity value.
- Site does not support LDP2 (Strategic Policy 1) to locate new development in sustainable location.
- Contrary to LDP2 (Policy D10 Transport Impact) that protects the convenience and safety of walking and cycling.
- Contrary to policy (E3 Air Quality) protecting air quality.
- Road network cannot support new development.
- Loss of biodiversity.
- The nature of the site means that loss or damage cannot be sufficiently mitigated should development occur.
- The site is well used for informal recreation.
- 900 residents have signed a petition objecting to planning application on this site.

**Modifications sought by those submitting representations:****(a) Schedule 15 - Proposal SG1.16: Crofthead Mill, Neilston**

SEPA (492/3)

- Deletion of proposal SG1.23 from schedule 15.

**(b) Schedule 15 - Proposal SG1.17: Neilston Juniors, Neilston and Schedule 8 - D12.8: Kingston Playing Field, Neilston**

Marie Victoria Wood (59/1), Karen Lappin (122/1), Thomas Guild (132/1), Robert Mould (137/1), Allan Paterson (203/1), Joyce Wallace (207/1), Ian Davidson (210/2), John Scott (247/1), Gary Lambie (259/1), Andrew Whiteford (261/1), Steven Galbraith (271/1), Mrs Susie Stewart (273/1), Christopher Hearn (274/1), Kevin Robertson (276/1), Lewis Pollock (277/1), Stephen Fox (279/1), James Lawn (281/1), Stephanie Lambie (282/1), Maureen Lambie (283/1), Ryan (285/1), Martyn Robertson (287/1), Allan Gray (288/1), 1st Neilston Boys Brigade (289/1), Debi Ward (290/1), Brian Tait (291/1), Lynsey McLaren (292/1), Louise McAdam (293/1), John O'Donnell (294/1), Sonja Millar (295/1), Eunan McColgan (296/1), Natalie (297/1), Sean Taylor (298/1), Neil Wilson (299/1), Hannah (300/1), Mrs Fiona Taylor (301/1), Elaine Ross (302/1), Sarah Aird (303/1), Anne Forrest (304/1), Emma Murdoch (305/1), Matt Drennan (306/1), Sam (307/1), Rosslyn Taylor (309/1), John Taylor (310/1), Catriona Broadhurst (312/1), George Boyce (313/1), David Todd (315/1), Claire Whelan (316/1), Kim Allan (317/1), Andrew McIlroy (318/1), Lorraine McLaughlin (319/1), Thomas Guild (320/1), Karyn Shields (321/1), Karen Jardine (322/1), Colin Whiteford (323/1), John shields (324/1), Kirsty Hutchinson (325/1), Helen Fergus (326/1), Jill keys (328/1), Karen Guild (329/1), Jim Miller (330/1), Dawn Haddow (331/1), Gareth Toner (332/1), Nairn Manson (333/1), Karen McNaughton (334/1), Jonathan Turner (335/1), Amelia Henderson (339/1), Amelia Henderson (340/1), Helen Boyce (342/1), Joanne Gardner (343/1), William Bannister (344/1), Euan Walker (347/1), Lesley Finnigan (348/1), Suzanne Sinclair (349/1), Linda King (350/1), Alan Hay (351/1), Joan Waygood (352/1), Gordon Turnbull (353/1), Mrs Yvonne Parker (356/1), Irene Turnbull (357/1), Jean McGarvie (358/1), Heather Deane (359/1), Angeline McSorley (361/1), Gordon Kilburn (363/1), Nicola peacock (364/1), Maria parker (365/1), Thomas Sanderson (366/1), Jacqueline Drennan (367/1), Jacqueline Tait (368/1), Scott McMillan (369/1), David Scougall (370/1), Kenneth Fulton (372/1), Lynn Mcnicol (373/1), Stephanie McInnes (374/1), Maura Rome (378/1), Anne MacLeod (379/1), William McLatchie (394/1), Margaret Pettigrew (396/1) (396/2), Ian (408/1), Cecilia Garry (411/1), Robert R. Cameron (424/1), Margaret Cameron (426/1), Jim Sheriff (442/1), Robert Dock (451/1), Neilston Juniors (452/1), Neilston Development Trust (454/1), Stuart Hamilton (465/1)

- Deletion of proposal SG1.17 from schedule 15.

**(d) Schedule 15 - Proposal SG1.20: North Kirkton Road, Neilston**

Margaret Pettigrew (396/3), Julie Kelly (450/1), Susan Mathers (453/1), Eleanor Christensen (508/1), Suzanne Sinclair (512/1), Rachel Ferguson (513/1), Arron Sinclair (514/1), R M Ferguson (515/1), A Ferguson (516/1), Stephen Queen (517/1), Sarah Queen (518/1), Ramis Ali (519/1), Colin McLeish (520/1), J Craig (521/1), Patsy Smith (522/1), D Gourlay (523/1), Jonathan Watson (524/1), Alan Price (525/1), Laura Gros (526/1), C Brenchley (527/1), Ronnie Burns (528/1), Agnieszka Matsiak (529/1), Jennifer Sommerville (530/1), Anne MacDonald (531/1), Niall Gibson (532/1), John Kennedy (533/1), Philomena Galsworthy (534/1), Helen Ross (535/1), Grzegorz Borowy (536/1),



Christine Collins (537/1), N McAllistair (538/1), Nan Walker (539/1), Ryan Jeffrey (540/1), Alexis Noon (541/1), Dianne Milligan (542/1), Dylan Watson (543/1), George MacDonald (544/1), Isabel McLeish (545/1), William Droy (546/1), Alan Milligan (547/1), Jean Wilson (548/1), Grant Walker (549/1), J Moore (550/1), Brian Collins (551/1), Colin MacBeth (552/1), Daria Borowa (553/1), William Ross (554/1), Anne Kennedy (555/1), Edna Hay (556/1), Maureen Gibson (557/1), Donna Stevenson (558/1), Callum McMichael (559/1), Margaret Burns (560/1), Jack Henry (561/1), Jean Laverty (562/1), Janet McLean (563/1), Catherine Droy (564/1), Clark Gordon (565/1), Ross McNally (566/1), Margaret Kennedy (567/1), Scott Jordan (568/1), G Donnelly (569/1), Kaleb Queer (570/1)

- Deletion of proposal SG1.20 from schedule 15.

### **Summary of responses (including reasons) by planning authority:**

#### **(a) Schedule 15 - Proposal SG1.16: Crofthead Mill, Neilston**

##### SEPA (492/3)

- Crofthead Mill a (category B) listed building has been a longstanding mixed use proposal for housing and business uses over successive development plans.
- The Council acknowledges the challenges in relation to flooding issues at the site. The current SEPA flood mapping shows the site in the vicinity of medium/high risk to flooding.
- The site was considered at examination of the current adopted LDP1 (CD/@@). At that time SEPA also made representation by objecting to the site drawing attention to the flood risks in the vicinity, advising that a Flood Risk Assessment (FRA) would be required to be submitted with proposals. This recommendation was accepted and the site identified with a note that a FRA is required in LDP1.
- The Proposed Plan continues to identify the potential for a mixed use development comprising housing, employment and community uses.
- The Crofthead Mill site is part of the established land supply, and programmed for the long-term, i.e. post 2031 as shown in the modification to Schedule 15. Schedule 15 also refers to the requirement for proposals to submit a FRA. The site is also included within Schedule 14: Environmental Protection Projects (D20.1) and Schedule 18: Business Proposals which also clearly refer to the requirement for a FRA.
- The Council is of the view that the Proposed Plan acknowledges and clearly sets out that future proposals will require to address flood constraints.
- It is not proposed to modify the Plan based on the above.

#### **(b) Schedule 15 - Proposal SG1.17: Neilston Juniors, Neilston and Schedule 8 - D12.8: Kingston Playing Field, Neilston**

SportScotland (7/1), Marie Victoria Wood (59/1), Karen Lappin (122/1) (122/2), Thomas Guild (132/1), Robert Mould (137/1), Allan Paterson (203/1), Joyce Wallace (207/1), Ian Davidson (210/2), John Scott (247/1), Gary Lambie (259/1), Andrew Whiteford (261/1), Steven Galbraith (271/1) (271/2), Mrs Susie Stewart (273/1), Christopher Hearn (274/1), Kevin Robertson (276/1), Lewis Pollock (277/1), Stephen Fox (279/1), James Lawn (281/1), Stephanie Lambie (282/1), Maureen Lambie (283/1), Ryan (285/1), Martyn Robertson (287/1), Allan Gray (288/1), 1st Neilston Boys Brigade (289/1), Debi Ward (290/1), Brian Tait (291/1), Lynsey McLaren (292/1), Louise McAdam (293/1), John O'Donnell (294/1), Sonja Millar (295/1), Eunan McColgan (296/1), Natalie (297/1), Sean

Taylor (298/1), Neil Wilson (299/1), Hannah (300/1), Mrs Fiona Taylor (301/1), Elaine Ross (302/1), Sarah Aird (303/1), Anne Forrest (304/1), Emma Murdoch (305/1), Matt Drennan (306/1), Sam (307/1), Rosslyn Taylor (309/1), John Taylor (310/1), Catriona Broadhurst (312/1), George Boyce (313/1), David Todd (315/1), Claire Whelan (316/1), Kim Allan (317/1), Andrew McIlroy (318/1), Lorraine Mclaughlin (319/1), Thomas Guild (320/1), Karyn Shields (321/1), Karen Jardine (322/1), Colin Whiteford (323/1), John shields (324/1), Kirsty Hutchinson (325/1), Helen Fergus (326/1), Jill keys (328/1), Karen Guild (329/1), Jim Miller (330/1), Dawn Haddow (331/1), Gareth Toner (332/1), Nairn Manson (333/1), Karen McNaughton (334/1), Jonathan Turner (335/1), Amelia Henderson (339/1), Amelia Henderson (340/1), Helen Boyce (342/1), Joanne Gardner (343/1), William Bannister (344/1), Euan Walker (347/1), Lesley Finnigan (348/1), Suzanne Sinclair (349/1), Linda King (350/1), Alan Hay (351/1), Joan Waygood (352/1), Gordon Turnbull (353/1), Mrs Yvonne Parker (356/1), Irene Turnbull (357/1), Jean McGarvie (358/1), Heather Deane (359/1), Angeline McSorley (361/1), Gordon Kilburn (363/1), Nicola peacock (364/1), Maria parker (365/1), Thomas Sanderson (366/1), Jacqueline Drennan (367/1), Jacqueline Tait (368/1), Scott McMillan (369/1), David Scougall (370/1), Kenneth Fulton (372/1), Lynn Mcnicol (373/1), Stephanie McInnes (374/1), Maura Rome (378/1), Anne MacLeod (379/1), William McLatchie (394/1), Margaret Pettigrew (396/1) (396/2), Ian (408/1), Cecilia Garry (411/1), Robert R. Cameron (424/1), Margaret Cameron (426/1), Jim Sheriff (442/1), Robert Dock (451/1), Neilston Juniors (452/1), Neilston Development Trust (454/1), Stuart Hamilton (465/1)

- A significant number of objections were received arguing the case for the deletion of the site from the Proposed Plan and its unsuitability for housing.
- The site was allocated in the adopted LDP for residential development of 35 homes linked with the relocation of the football club from their Brig O'Lee site to Kingston Park as part of a wider community/sports hub. This linked proposal sought to provide the football club with a modern new build facility whilst also improving the facilities, usability and overall attractiveness of Kingston Park. This proposal was carried forward to the Proposed Plan.
- It is acknowledged that para 226 of Scottish Planning Policy states that sports facilities be safeguarded from development, and the East Renfrewshire Sports pitch Strategy identifies the sites long-term aim as 'protect' and enhance.
- The general comment that Kingston Playing field, maybe enhanced with astro pitches is acknowledged. How the space is managed in the future with potential for different surfaces is a matter for the future management of the area.
- It is acknowledged that the football club plays an important part of the long established sporting and leisure facilities within Neilston and that there is already a longstanding community sports hub operating from the Brig O'Lee site. Since publication of the Proposed Plan Neilston Juniors club has secured a long-term lease (until 2045) at the current site, from the Council and no longer wish to relocate.
- It is accepted that given the long-term lease secured at the Brig O' Lee site the proposal is not an active proposal. The Council is of the view that proposals (SG1.17 and D12.8) should be removed from the Proposed Plan and Schedules 8 and 15 updated accordingly.
- Due to the lack of activity with the proposal the site was allocated in the longer term i.e. post 2029. It is not viewed that the deletion of the housing element of the proposal will have any negative impact upon the overall housing land supply for Neilston, the Lavern Valley Housing Market Area or the land supply generally across the Council area. The housing land supply position is documented further under Issue 14 and the Housing Background Report (BR2) (CD/@@). This issue

concludes that the Proposed Plan is providing a generous supply of land to meet the requirements of Clydeplan and SPP.

- Given all these factors outlined above, if the Reporter is so minded to recommend that the representations in relation to the removal of these proposals (SG1.17 and D12.8) be accepted and the plan modified accordingly, the Council would be supportive of this modification. This is because it would retain the existing community/sporting provision at the site and complement the long-term lease which is now in place between the Council and the football club.

### **(c) Schedule 15 - Proposal SG1.18: Holehouse Brae, Neilston**

Robert Winning (412/1)

- The site was allocated for residential development in the adopted LDP1 as safeguarded site post 2025 for 65 units and removed from the green belt. This allocation has been carried forward to the Proposed Plan. The site is programmed in the medium term i.e. 2024 to 2029.
- There is currently no proposal submitted for site SG1.10. The Council is of the opinion that the detailed matters raised in the representation are best dealt with at the appropriate stage in the Development Management process and once detailed plans are submitted.
- It is not proposed to modify the Plan based on the above.

### **(d) Schedule 15 - Proposal SG1.20: North Kirkton Road, Neilston**

Margaret Pettigrew (396/3), Julie Kelly (450/1), Susan Mathers (453/1), Eleanor Christensen (508/1), Suzanne Sinclair (512/1), Rachel Ferguson (513/1), Arron Sinclair (514/1), R M Ferguson (515/1), A Ferguson (516/1), Stephen Queen (517/1), Sarah Queen (518/1), Ramis Ali (519/1), Colin McLeish (520/1), J Craig (521/1), Patsy Smith (522/1), D Gourlay (523/1), Jonathan Watson (524/1), Alan Price (525/1), Laura Gros (526/1), C Brenchley (527/1), Ronnie Burns (528/1), Agnieszka Matsiak (529/1), Jennifer Sommerville (530/1), Anne MacDonald (531/1), Niall Gibson (532/1), John Kennedy (533/1), Philomena Galsworthy (534/1), Helen Ross (535/1), Grzegorz Borowy (536/1), Christine Collins (537/1), N McAllistair (538/1), Nan Walker (539/1), Ryan Jeffrey (540/1), Alexis Noon (541/1), Dianne Milligan (542/1), Dylan Watson (543/1), George MacDonald (544/1), Isabel McLeish (545/1), William Droy (546/1), Alan Milligan (547/1), Jean Wilson (548/1), Grant Walker (549/1), J Moore (550/1), Brian Collins (551/1), Colin MacBeth (552/1), Daria Borowa (553/1), William Ross (554/1), Anne Kennedy (555/1), Edna Hay (556/1), Maureen Gibson (557/1), Donna Stevenson (558/1), Callum McMichael (559/1), Margaret Burns (560/1), Jack Henry (561/1), Jean Laverty (562/1), Janet McLean (563/1), Catherine Droy (564/1), Clark Gordon (565/1), Ross McNally (566/1), Margaret Kennedy (567/1), Scott Jordan (568/1), G Donnelly (569/1), Kaleb Queer (570/1)

- A significant number of objections were received arguing the case for the deletion of the site from the Proposed Plan and its unsuitability for housing.
- The site was allocated for residential development in the adopted LDP1 as safeguarded site post 2025 for 65 units. The site was subsequently removed from the green belt. Consequently Policy D3 is no longer relevant. This allocation has been carried forward to the Proposed Plan. The site is programmed in the medium term i.e. 2024 to 2029.
- The notes section to Schedule 15 states that the detailed capacity and phasing are subject to the consideration of any planning application submitted. Currently, there

is a live planning application (2019/0788/TP) (CD/@@) for 81 dwellings and 10 flats. At the time of writing, this application is still being considered.

- The Council is of the opinion that the detailed matters raised in the representation are best dealt with at the appropriate stage in the Development Management process and once detailed plans are submitted.
- The Council is of the view that the site is effective and acknowledges that there remains an active house builder interest in developing the site. The site forms part of the effective and established land supply. In addition the capacity and programming of the site has been factored in to the education analysis of the area.
- The adjacent site was identified as a preferred housing site under Option 2A of the MIR (CD/@@) (MIR11). However, as explained under Issue 2 and Issue 13 analysis of education, demographic and housing data showed that further housing releases would have major impacts upon the existing education infrastructure. As such the proposal was not carried forward to the Proposed Plan.
- The adopted LDP1 and the Neilston Infill Development SPG (CD/@@) supported the promotion of a number of green belt release sites. These allocations contribute both to the overall housing land supply and contribute to the delivery of other proposals and in making Neilston a vibrant and successful village.
- The site is a sustainable location and accessible to Neilston station, shopping, education and community facilities.
- The site does not impinge on any national or local nature conservation designations. The nearest Local Biodiversity Site (LBS) covered by Policy D7.3 is located to the east of this site, mainly being focused around Kittoch burn and tributaries. The site is not allocated as greenspace under Policy D5.
- There are numerous opportunities for access to countryside for informal recreation. Allocation of this site does not prevent access to the countryside.
- Based upon the above the Council retains the view that this site remains a suitable residential site.
- It is not proposed to modify the Plan based upon the above.

**Reporter's conclusions:**

**Reporter's recommendations:**

<b>Issue 19</b>	<b>Housing Supply Newton Mearns</b>	
<b>Development plan reference:</b>	<b>Policy SG1: Housing Supply, Delivery and Phasing</b>	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Mrs Alison Gilchrist (113/1)  Alexander Newall (121/1)  Steve Brockie (134/1)  Michael Maccorquodale (136/1)  Mr and Mrs Brooks (140/1)  Alan Gow (153/1)  Douglas McCaig (164/1)  Bhupinder Singh Lalli (165/1)  Fiona Watson (188/1)  Melyvn Gaya (195/1)  Steve Brockie (208/1)  Andrew Beaumont (218/1)  Lindsey Clothier ( 221/1)  Robert &amp; Lynda Roddie (327/1)  Peter Kewin (338/1)  Sylvia Black (341/1)  Lynne Swan (346/1)  Sean Deakin (402/2)  Nicola Docherty (415/1)  Susan Robertson (421/1)  Sheraz Ramzan (447/1)  Mactaggart &amp; Mickel (458/1)  Newton Mearns Flood Group (480/2)  SEPA (492/2)  Mrs Anne Lewis (502/1)</p>		
<b>Provision of the development plan to which the issue relates:</b>	<p>Schedule 15: Housing Sites  Schedule 16: Affordable Housing and Housing for Particular Needs.  SG1.23: Broom Park Drive, Newton Mearns  SG1.30: Crookfur Cottage Homes, Newton Mearns  SG4.5: Barrhead Road, Newton Mearns</p>	
<b>Planning authority's summary of the representation(s):</b>		
<p><b><u>(a) Schedule 15 - Proposal SG1.23 Broompark Drive, Newton Mearns</u></b></p> <p><b><u>Full list of representations set out in Appendix 1 with summarised key points set out below.</u></b></p> <p><u>Mrs Alison Gilchrist (113/1), Steve Brockie (134/1), Michael Maccorquodale (136/1), Mr and Mrs Brooks (140/1), Alan Gow (153/1), Douglas McCaig (164/1), Bhupinder Singh Lalli (165/1), Fiona Watson (188/1), Melyvn Gaya (195/1), Steve Brockie (208/1), Andrew</u></p>		

Beaumont (218/1), Lindsey Clothier ( 221/1), Robert & Lynda Roddie (327/1), Kewin (338/1), Sylvia Black (341/1), Lynne Swan (346/1), Nicola Docherty (415/1), Susan Robertson (421/1), Sheraz Ramzan (447/1), Mrs Anne Lewis (502/1)

- There is a discrepancy in the LDP2 plan and the neighbour notification letter. 50% of this land needs to be kept green so why is it showing the meadow side on plan.
- Development will increase flood risk to neighbours.
- Every year the proposed land gets flooded and is required to ease the pressure from the burn even with recent work by Scottish Water the drains still cannot handle the rain water.
- There would be a loss of biodiversity and threat to protected species: herons and water voles recreational open space.
- Traffic congestion would increase on local roads - Already poor road surface will deteriorate further.
- There would be a loss of recreational greenspace to local people.
- Local school rolls are at capacity.
- There would be unacceptable disturbance during construction phase.
- New development would result loss of privacy to existing residents.
- Impact on value of house & neighbouring house.
- Adverse impact on standard of living, community and environment.

Mactaggart & Mickel (458/1)

- The Proposed LDP2 reduces the actual housing site allocation to only the northern part of the Mactaggart & Mickel ownership and also seeks to reduce the capacity from 8 to 5 houses.
- A planning application is currently under preparation, premised on the adopted Plan allocation over the full extent of the Mactaggart & Mickel ownership identified in LDP1 and for 8 houses. Technical work has been being undertaken with regards to flooding and drainage to inform the impending planning application proposals. The site can be developed for 8 houses of commensurate size and scale to those in the surrounding area and with greenspace to meet the Council requirements, and to accord with other relevant detailed policy requirements set out in the adopted LDP, Proposed LDP2 and Scottish Planning Policy.

Mrs Jean Black, Newton Mearns Flood Group (480/1)

- The Flood Group does not support inclusion of site SG1.23 Broompark Drive, in LDP2. This greenspace site was formerly used as school playing fields by Belmont House School.
- The site was not developed at the time that the Broom Estate was built as it is the flood plain of the Broom Burn and regularly floods.

SEPA (492/1)

- Proposal is fully within the 1:200 year flood plain.

**(b) Schedule 15 - Proposal SG1.30: Crookfur Cottage Homes, Newton Mearns**

Alexander Newall (121/2)

- Concern that in the new conservation area at Crookfur Cottage Homes there appears to be a plan to destroy the homes.

**(c) Schedule 15 - Proposal SG4.5: Barrhead Road, Newton Mearns**

Sean Deakin (402/2)

- There has been no impact study of social housing at Barrhead road.
- No environmental report and impact on road traffic.
- How will the site be accessed?
- Loss of green space and impact of more housing on this area which will spoil the character of the original newton Mearns. This space is used by locals for walking dogs etc. and valued by all residents of Townhead road/ cottages.
- Considered site maybe on common land. Has this been looked into?
- Council not properly consulted residents, gone around doors and showed the plans/proposals to neighbouring properties/residents.
- Barrhead road is already congested, ASDA lorries parked on bus stops traffic queue at Avenue shopping centre leading into road especially at Fairweather Hall. Has a traffic impact assessment been completed?

**Modifications sought by those submitting representations:**

**(a) Schedule 15 - Proposal SG1.23 Broompark Drive, Newton Mearns**

Mrs Alison Gilchrist (113/1), Steve Brockie (134/1), Michael Maccorquodale (136/1), Mr and Mrs Brooks (140/1), Alan Gow (153/1), Douglas McCaig (164/1), Bhupinder Singh Lalli (165/1), Fiona Watson (188/1), Melyvn Gaya (195/1), Steve Brockie (208/1), Andrew Beaumont (218/1), Lindsey Clothier (221/1), Robert & Lynda Roddie (327/1), Kewin (338/1), Sylvia Black (341/1), Lynne Swan (346/1), Nicola Docherty (415/1), Susan Robertson (421/1), Sheraz Ramzan (447/1), Newton Mearns Flood Group (480/2), SEPA (492/2), Mrs Anne Lewis (502/1)

- Removal of site SG1.23 from Schedule 15 Housing Sites and on the on the associated Proposals Map

Mactaggart & Mickel (458/1)

- The Proposals Map should be amended to allocate the site over the same extent of land as in the adopted LDP, and that Schedule 15 of LDP2 be amended up from 5 units to apply a capacity of 8 units to site SG1.23

**(b) Schedule 15 - Proposal SG1.30: Crookfur Cottage Homes, Newton Mearns**

Alexander Newall (121/1)

- Removal of site SG1.30 from Schedule 15 Housing Sites and on the associated proposals map.

**(c) Schedule 15 - Proposal SG4.5: Barrhead Road, Newton Mearns**

Sean Deakin (402/2)

- Removal of site SG4.5 from Schedule 16 Affordable Housing Sites and from the associated proposals map.

### Summary of responses (including reasons) by planning authority:

#### **(a) Schedule 15 - Proposal SG1.23 Broompark Drive, Newton Mearns**

Mrs Alison Gilchrist (113/1), Steve Brockie (134/1), Michael Maccorquodale (136/1), Mr and Mrs Brooks (140/1), Alan Gow (153/1), Douglas McCaig (164/1), Bhupinder Singh Lalli (165/1), Fiona Watson (188/1), Melyvn Gaya (195/1), Steve Brockie (208/1), Andrew Beaumont (218/1), Lindsey Clothier (221/1), Robert & Lynda Roddie (327/1), Kewin (338/1), Sylvia Black (341/1), Lynne Swan (346/1), Nicola Docherty (415/1), Susan Robertson (421/1), Sheraz Ramzan (447/1), Newton Mearns Flood Group (480/2), SEPA (492/2), Mrs Anne Lewis (502/1)

- Objections were received arguing the case for the deletion of the site from the Proposed Plan and its unsuitability for housing.
- The site at Broompark Drive/Windsor Avenue is a longstanding greenfield site which forms part of the established land supply. The site was allocated for housing as site SG1.32 in the adopted LDP1 (CD/@@) with capacity for 8 units and with a capacity of 5 in the Proposed Plan. The site has a number of mature trees and is overgrown. The southern section of the site comprises the former Belmont school playing field. The entire site is in the ownership of Mactaggart & Mickel.
- The Council notes the objections submitted on grounds of flood risk and SEPA's objection. The Council acknowledges that the majority of the site falls within an area subject to a 1:200 year flood probability event. It is likely that the adjacent playing field acts as a natural flood alleviation/storage area.
- Schedule 15 acknowledges that a flood risk assessment (FRA) will be required. The Council believes that the application of Proposed Plan Policies E6: Water Environment, E7: Flooding and E8: Water Management combined with a flood risk assessment provide a strong policy framework against which to assess any future planning proposal. A FRA will also identify the developable areas and appropriate mitigation measures. The comments of SEPA will also be fully taken into account in the decision making process.
- The representations regarding a discrepancy in site mapping appear to have arisen because there are multiple layers of policy covering the site. The entire area is covered by Proposal SG1.23 and divided between Urban Greenspace (Policy D5) and Housing. The entire site is also covered by Policy D4 Green Network.
- The division of the site reflects the modification proposed by the Reporter at the LDP1 examination (pages 338 to 339 of Examination Report) (CD/@@). The Reporter's modification stated that "proposals must provide an area of greenspace at least equal to that of the former playing field that forms the southern part of the site". This is reflected on the Proposals Map.
- The Council notes concern of representees that there will be loss of greenspace but would stress that the proposal is small scale for 5 houses on a 1.1 hectare site. Policy D4 and D5 aim to ensure that any development proposal must protect and enhance the green network including its wildlife, biodiversity, recreational, landscape and access functions. It is noted that some objections raise the presence on site of Grey Heron as a protected species, it should be realised this protection is not specific to herons and that all birds are protected by law under the Wildlife and



Countryside Act. The presence of bats will require any development to undertake a bat survey. As stated above any proposal must ensure that an area of greenspace at least equal to that of the former playing field that forms the southern part of the site is provided. The Council believes that there are adequate policies in place to protect and enhance this area of green network and biodiversity.

- Future development proposals supported by a FRA will dictate the boundary of any developable area, and keeping both policy designations across the entire area allows for flexibility during the FRA process.
- Traffic impacts are best addressed at planning application stage once detailed plans have been submitted.
- The allocation of five houses has been assessed for educational impact as part of the Education Background Report (BR4) (CD/@@) which supports the Proposed Plan.
- It is not proposed to modify the Plan based upon the above.

#### Mactaggart & Mickel (458/1)

- The Council acknowledges that the entire site is in the ownership of Mactaggart & Mickel. The representation states that the housing allocation only covers the northern section of the site. However, this is an incorrect assumption. The Proposals Map clearly shows that the housing allocation covers the entirety of the site with areas shaded brown for housing and green for open space to graphically display the requirements specified at the previous LDP Examination.
- The site was allocated for eight houses in LDP1. The Council is of the opinion that due to the site constraints outlined above and surrounding character where large detached houses predominate, 5 houses is an appropriate capacity for the site.
- A capacity of 5 units was also proposed by Mactaggart & Mickel to the 2019 HLA (CD/@@) where they indicated programming of 3 units in 2023/24 and 2 units in 2024/25. This has been reflected in the Proposed Plan.
- The Council retains the view that the Proposed Plan adequately reflects the previous reporters comments and that a low density development would be suitable at this location subject to the findings of a FRA and appropriate mitigation.
- It is not proposed to modify the Plan based upon the above.

#### **(b) Schedule 15 - Proposal SG1.30: Crookfur Cottage Homes, Newton Mearns**

##### Alexander Newall (121/1)

- The site has planning permission (2016/0794/TP) (CD/@@) for 136 units and involves the demolition of 95 existing units with a net increase of 41. The application was granted on 08/02/2018 and the site is currently under construction. The programming and site status is reflected in the HLA and Action Programme.
- It is not proposed to modify the Plan based upon the above.

#### **(c) Schedule 15 - Proposal SG4.5: Barrhead Road, Newton Mearns**

##### Sean Deakin( 402/2)

- An objection was received arguing the case for the deletion of the site from the Proposed Plan and its unsuitability for housing.

- The representee raises issues relating to transport assessment, environmental assessment and site access. The Council is of the opinion that these matters are best dealt with at the appropriate stage in the Development Management process and once detailed plans are submitted.
- The Council disagrees with the suggestion that Site SG4.5 should be removed from Schedule 16. The site was previously allocated in the adopted LDP1 for affordable housing (SG1.40). There is currently no proposal submitted for the site.
- The Council can confirm that it has clear title to the site and that the site is not listed on the common ground register.
- The site is not designated as urban greenspace, however, the Council acknowledges that there may be some informal use of this area.
- The Council has undertaken some initial transport assessments that demonstrate that the site can be safely accessed. It is also proposed to create a new safe crossing point on Barrhead Road coupled with improvements to nearby park entrances.
- There is a significant pressure for affordable housing throughout the Council area. The current Strategic HNDA (CD/@@) estimates that in East Renfrewshire there is a total need for 880 affordable homes during the period 2012-2029. It is therefore important that both the Local Housing Strategy (CD/@@) and the Proposed Plan continue to address this issue.
- The site could deliver approximately 20 affordable units for Newton Mearns and help meet the social housing needs of the area. It is programmed in the short term (2019 to 2024) as shown in the detailed programming set out in the 2019 Housing Land Audit and the Action Programme (CD/@@).
- The site is proposed for 1 and 2 bedroom flats for those 55 years+ to be delivered by the Council. The site is included in the latest Strategic Housing Investment Plan (CD/@@). Funding has been assigned to the site.
- The Council's view is that Site SG4.2 should remain as an allocated housing site in Schedule 16.
- It is not proposed to modify the Plan based upon the above.

**Reporter's conclusions:**
**Reporter's recommendations:**

<b>Issue 20</b>	Submitted Housing Supply Barrhead	
<b>Development plan reference:</b>	Policy SG1: Housing Supply, Delivery and Phasing Schedule 15: Housing Sites	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
L Mackay & Saurin (135/1) Miller Homes (463/1) (463/5) (463/8) Gladman Developments Ltd (503/1) (503/2) Avant Homes (504/1) (504/2) (504/8)		
<b>Provision of the development plan to which the issue relates:</b>	Chapter 4: Promoting Sustainable and Inclusive Economic Growth Alternative Housing Development Proposals: <ul style="list-style-type: none"> <li>• LDP2-01 Glasgow Road Salterland Road, Barrhead (CS003)</li> <li>• LDP2-10 Springhill Road West, Barrhead (CS044)</li> <li>• LDP2-24 Fereneze, Barrhead (CS026)</li> <li>• LDP2-25 Blackbyres Farm, Barrhead (CS040)</li> </ul> Supporting documents: <ul style="list-style-type: none"> <li>• Site Evaluation</li> <li>• Strategic Environmental Assessment</li> </ul>	
<b>Planning authority's summary of the representation(s):</b>		
<p><b><u>(a) LDP2-01 Glasgow Road Salterland Road, Barrhead (CS003)</u></b></p> <p><u>L Mackay &amp; Saurin (135/1)</u></p> <ul style="list-style-type: none"> <li>• Object to site CS003 on site evaluation matrix being designated under polices D3 Greenbelt and D4 Green Network. It should be removed from greenbelt and re-allocated for housing.</li> </ul> <p><b><u>(b) LDP2-10 Springhill Road West, Barrhead (CS044)</u></b></p> <p><u>Miller Homes (463/1) (463/5) (463/8)</u></p> <ul style="list-style-type: none"> <li>• Objects to the non-allocation of land at Springhill Road West Barrhead (CS044) for residential development 280 homes including 25% affordable.</li> <li>• Objection that the Proposed LDP2 does not include any new housing sites based upon justification that there is insufficient education capacity to support additional residential allocations.</li> <li>• Should it be determined that there is a requirement to allocate additional housing sites to ensure that an effective housing land supply is provided, the site at Springhill Road West, Barrhead is an appropriate site for residential development.</li> <li>• Representee submitted a development framework, housing land supply statement and education note in support of their proposal.</li> </ul>		

- The site is also considered to be meet the tests of effectiveness set out in PAN 2/2010.
- The site will meet the requirements of Scottish Planning Policy and Clydeplan. The proposal can make a valuable contribution to the effective housing land supply during the period of the Proposed LDP 2 as well as any future development strategy.
- The Education note submitted with the representation concludes that education capacity is not an insurmountable constraint to developing the site for housing at this location and that there are no capacity constraints in the Levern Valley sub area as evidenced by the Education background Report (BR4).
- Query the site evaluation and SEA evaluation and scoring of sites. State that the site should have been scored more positively for Q3 (Impact of Development), Q8 (Accessibility to Public Transport) and Q9 (Constraints).
- The updated SEA Assessment also demonstrates that the proposal will have an overall positive impact on the environment.

**(c) LDP2-24 Fereneze, Barrhead (CS026)**

Gladman Developments Ltd (503/1) (503/2)

- Object to the non-inclusion of site CS026: Fereneze, Barrhead in the Proposed Plan and seek a modification to allocate the site for housing.
- The site is capable of delivering 50 units in the short term.
- The Proposed Plan fails to allocate sufficient private housing land within the Levern Valley Housing Market Area. There is evidently a shortfall in the five-year supply of effective private housing land which needs to be addressed.
- The settlement is a sustainable location that can support and accommodate the increased levels of housebuilding that is already planned for.
- With the identified shortfall in the five-year supply of effective housing land within the Levern Valley Housing Market Area, the Council need to allocate additional sites.
- The site has also been subject to a planning application with a suite of supporting technical documentation (2017/0784/TP). Due to landownership issues, the site was ultimately removed through the last LDP process. Subsequently, those landownership issues have been addressed. The site was previously allocated and is effective in the short term.
- The planning application, which was refused by the Council in May 2018, was refused on the basis there was no shortfall. The reasons for refusal centred around the premise of sufficient land being allocated and the need for housing not being identified, however as demonstrated in this submission, there is a clear need for it.
- There were no technical objections that would preclude development and delivery of this site in the short-term.
- The site is suitably located to amenities and public transport. In the supporting documentation, the Transport Statement, concluded that the site was generally accessible to a range of modes of travel. It is evident that the site is sustainable.
- Only minor landscape & visual adverse effects are anticipated and ultimately the proposal would accord with the principles and objectives of the green belt. The effects on the character of the prevailing landscape result in a limited incursion into the Clyde Basin Farmlands regional character.
- Query the Site Evaluation. Scoring for this site is incorrect and should be scored more positively. The Council give a score of 11 whereas it is considered the overall

site evaluation score should be 17, which is the same or better than 11 of 13 sites, which were identified at MIR stage. Therefore the site should be considered a suitable location for housing. The questions which are stated should be scored more positively are Q2 (site location), Q3 (Impact of development), Q8 (Accessibility to public transport), Q9 (Constraints).

**(d) LDP2-25 Blackbyres Farm, Barrhead (CS040)**

Avant Homes (504/1) (504/2) (504/8)

- Objects to the non-allocation of land at Blackbyres Farm, Barrhead (CS040) for residential development of 700 homes.
- Objection that the Proposed LDP2 does not include any new housing sites based upon justification that there is insufficient education capacity to support additional residential allocations.
- The Proposed Local Development Plan (LDP) 2 includes no new housing allocations. The Council's primary reason for not allocating any additional housing sites is that there is insufficient education capacity available to support additional housing allocations in East Renfrewshire.
- Should it be determined that there is a requirement to allocate additional housing sites to ensure that an effective housing land supply is provided, the site at Blackbyres Farm, Barrhead is an appropriate site for residential development.
- Representee submitted a development framework, housing land supply statement and education note in support of their proposal.
- The site is also considered to be meet the tests of effectiveness set out in PAN 2/2010.
- The Education note submitted with the representation concludes that education capacity is not an insurmountable constraint to developing the site for housing at this location and that there are no capacity constraints in the Levern Valley sub area as evidenced by the Education background Report (BR4).
- Query the site evaluation and SEA evaluation and scoring of sites. State that the site should have been scored more positively for Q7 (Accessibility to Services/Facilities), Q8 (Accessibility to Public Transport).
- The updated SEA Assessment also demonstrates that the proposal will have an overall positive impact on the environment.

**Modifications sought by those submitting representations:**

(a) LDP2-01 Glasgow Road Salterland Road, Barrhead (CS003)

L Mackay & Saurin (135/1)

- Inclusion of the site within Schedule 15 of the Proposed LDP2 for residential development and identification on the associated Proposals Map.
- Removal from the Green Belt.

(b) LDP2-10 Springhill Road West, Barrhead (CS044)

Miller Homes (463/1)

- Inclusion of the site within Schedule 15 of the Proposed LDP2 for residential development and identification on the associated Proposals Map.
- Removal from the Green Belt.

(c) LDP2-24 Fereneze, Barrhead (CS026)Gladman Developments Ltd (503/1)

- Inclusion of the site within Schedule 15 of the Proposed LDP2 for residential development and identification on the associated Proposals Map.
- Removal from the Green Belt.

(d) LDP2-25 Blackbyres Farm, Barrhead (CS040)Avant Homes (504/1)

- Inclusion of the site within Schedule 15 of the Proposed LDP2 for residential development and identification on the associated Proposals Map.
- Removal from the Green Belt.

**Summary of responses (including reasons) by planning authority:****OVERVIEW**

- Justification for the Development Strategy of the Plan is demonstrated under Issue 2 (Development Strategy). The Council's approach to housing supply is addressed under Issue 14 (Housing Supply, Delivery and Phasing) and Education Infrastructure under Issue 13 (Community and Education Facilities and Infrastructure). Under these issues it is clearly demonstrated that the Plan is providing an effective generous land supply in to meet the requirements of Scottish Planning Policy (SPP) (CD/@@) and Clydeplan (2017) (CD/@@) and that Education Infrastructure remains a significant constraint to further development being supported in the Proposed Plan. These issues conclude that further housing releases would have major impacts upon the existing education infrastructure across all sectors and both the Leven Valley and Eastwood areas.

**Site Evaluation and Strategic Environmental Assessment**

- Representations for sites (b), (c) and (d) objected to the scoring and findings of the Site Evaluation (CD/@@) and Strategic Environmental Assessment (CD/@@).
- The site evaluation study was prepared to assist with the identification of sites to be included in the Proposed Plan. The assessment methodology along with the SEA, together provide a consistent, robust and objective framework for the assessment of land use proposals. The site evaluation methodology is thorough and robust and provides a fair and consistent method of ranking and comparing alternative sites.
- The SEA clearly identifies environmental effects on policies and proposals and potential mitigation measures. Comments from the SEA gateway and other organisations will inform the next stage of the SEA process as referred to further under Issue 1.
- This approach has been applied consistently across all sites and has been agreed as an accepted methodology by Reporters at previous LDP examinations. The Council stands by the outcomes of these exercises.
- It is not proposed to modify the Plan based on the above.

**(a) LDP2-01 Glasgow Road Salterland Road, Barrhead (CS003)**L Mackay & Saurin (135/1)

- An objection was received regarding the non-inclusion of the site as a preferred housing site under Policy SG1 and Schedule 15.
- This Brownfield site is located on the northern edge of Barrhead and is bound by Salterland Road to the east, the A736 to the west and the railway line to the south. The site is currently grassed with some hard standing. The site forms part of the wider green network under Policy D4. The proposed site is clearly separated from the main built-up area of Barrhead and the Barrhead North Policy M3 master plan area by the railway line. The railway establishes a strong defensible Green Belt boundary.
- The Landscape Character assessment (CD/@@) identifies the landscape sensitivity as medium to high, visual sensitivity as low to medium, and overall green belt sensitivity as moderate to strong.
- The site falls within an area of Green Belt that represents an important green corridor separating Nitshill and Barrhead. However, it is recognised that this parcel of land does not strongly contribute to the attractiveness of this green corridor and is well contained.
- The development of Brownfield sites is a Council priority; however, sites must be in sustainable locations and in accordance with the Development strategy. This site lies within a wider area of Green Belt that the Council views as important for retention.
- This site given its location is not supported by the Proposed Plan. It is recommended that this site continues to be allocated as Green Belt. Other more sustainable sites have been identified in the Proposed Plan to meet housing needs. This proposal would direct development away from master planned areas and other housing sites identified in the Proposed Plan elsewhere in Barrhead.
- The effectiveness and deliverability of the site have not been demonstrated and the Council is not aware of any active house builder interest in the site.
- As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.
- It is recommended that this site continues to be allocated as Green Belt.
- It is not proposed to modify the Plan based upon the above.

**(b) LDP2-10 Springhill Road West, Barrhead (CS044)**Miller Homes (463/1) (463/5) (463/8)

- An objection was received regarding the non-inclusion of the site as a preferred housing site under Policy SG1 and Schedule 15.
- This green field site is located in the Green Belt on the South Western fringe of Barrhead adjacent to the Barrhead South master plan (Policy M2.2) where significant residential development is proposed in the short to medium term. The site consists of agricultural fields. The northern boundary of the site is defined by a mature tree belt with Springhill Road to the south and a hedgerow forming the western boundary. A Local Biodiversity Site (LBS) is located adjacent to the northern site boundary.

- The Landscape Character assessment identifies the landscape sensitivity as medium, visual sensitivity as medium, and overall green belt sensitivity as moderate to strong.
- The scale of development proposed would result in a significant intrusion into the Greenbelt and reduction in the gap between Neilston and Barrhead. The site makes a positive contribution to this part of the Green Belt and acts as a strong green gateway into/out of Barrhead when approaching from the west. The release of this site may also expose a wider area of Green Belt to the west of the proposed site to development pressure. Land to the west is also partly under the control, of Miler Homes. Development would extend the area of visible built development further west and would require sensitive boundary landscaping to minimise the visual impact of development. The site forms part of the wider green network under Policy D4.
- It is recognised that the development framework indicates that mitigation planting could assist with strengthening the landscape character and urban edge, could help to screen development, enhance biodiversity and provide a wildlife / green corridor.
- It is accepted that a house builder is actively involved with the site. The representation also states that that the site is effective, free from constraints, and deliverable.
- It is accepted the site is accessible to local services and facilities. Improvements to public transport infrastructure such as the proposed rail station (Strat 3.7) at Barrhead South also have the potential, once operational, to increase the overall sustainable merits of the site.
- Notwithstanding the above, the site given its location in the Green Belt is not supported by the Proposed Plan. Other more sustainable sites have been identified in the Plan to meet housing needs.
- As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.
- It is recommended that this site continues to be allocated as Green Belt.
- It is not proposed to modify the Plan based upon the above.

**(c) LDP2-24 Fereneze, Barrhead (CS026)**

**Gladman Developments Ltd (503/1)**

- An objection was received regarding the non-inclusion of the site as a preferred housing site under Policy SG1 and Schedule 15.
- This green field site is located in the Green Belt on the North West fringe of Barrhead and is elevated above the existing residential estate to the east. It is part of an agricultural field and slopes westwards from the back-gardens of the adjacent properties. Part of the southern end of the site falls within a Local Biodiversity Site and adjacent to a SSSI. At the west side of the site the gradients are steeper and continue to rise up towards the Fereneze Golf Course. There are trees/bushes to the north and south parts of the site and the trees/bushes continue to the west beyond the site boundary.
- The site was identified as a housing site for approximately 40 units as a result of a recommendation by the Reporters who undertook the Examination of the Local Plan in 2010 (CD/@@). It was the Reporters view that there was a numerical justification for allocating additional sites; this site could assist with topping up the land supply; and would result in a minor adjustment of the Green Belt boundary. Whilst the Council had not supported the promotion of this site for development, the Reporters findings are binding and the Council was directed to include the site



within the adopted Plan. The Council favoured the area being retained as Green Belt.

- The site was previously promoted by Mactaggart and Mickel, however, this developer no longer have an interest in the site. The site is now being promoted by Gladman, although the Council is not aware of any active house builder interest in the site.
- The Council has consistently favoured the area being retained as Green Belt and promoted its deletion through production of LDP1 (CD/@@). There was a significant volume of objections arguing the case for the deletion of the site from the 2012 Proposed LDP1 and its unsuitability for housing. The Reporter who undertook the Examination of LDP1 (CD/@@) agreed with the Council that the site should be deleted as a housing opportunity and its status returned to Green Belt and Green Network in the adopted LDP1.
- The Reporter concluded that development of this site for housing was not necessary to provide an effective, generous housing land supply. The deletion of the housing site and its designation as Green Belt would direct development to those strategic sites which support the spatial strategy of the proposed plan and protect and enhance the character and landscape setting of the settlement. The Reporter considered that the provision of a more robust green belt boundary alone would not outweigh the adverse impact on the character and setting of Barrhead.
- The Landscape Character assessment identifies the landscape sensitivity as low to medium, visual sensitivity as high, and overall green belt sensitivity as moderate to strong.
- The site forms an important role in forming a backdrop to the setting and character of Barrhead and forms part of the wider green network under Policy D4.
- It is acknowledged that development could create a stronger green belt boundary, however, its development would resultant in an adverse impact on the setting of Barrhead. Development would extend the area of visible built development both higher and further west on the Fereneze slopes and would require sensitive boundary landscaping to minimise the visual impact of development.
- The Council recognises that the proposal included scope for a network of formal path links across the upper hill slopes where there is currently limited access.
- An application from Gladman for residential development was refused by the Council on 3<sup>rd</sup> May 2018 (2017/0784/TP) (CD/@@). 170 representations plus a petition with 514 signatures was submitted objecting to the application. The application was deemed contrary to Clydeplan and LDP1 when considered in relation to its greenbelt location and the current and allocated housing land supply. It was considered that this was not the right location for this development.
- The Council is of the opinion that an access solution from Brownside Avenue remains to be resolved.
- The representation states that that the site is effective, free from constraints, and deliverable.
- Notwithstanding the above, the site given its location in the Green Belt is not supported by the Proposed Plan. Other more sustainable sites have been identified in the Plan to meet housing needs.
- As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.
- It is recommended that this site continues to be allocated as Green Belt.
- It is not proposed to modify the Plan based upon the above.

**(d) LDP2-25 Blackbyres Farm, Barrhead (CS040)****Avant Homes (504/1) (504/8)**

- An objection was received regarding the non-inclusion of the site as a preferred housing site under Policy SG1 and Schedule 15.
- This green field site is located in the Green Belt on the North Eastern fringe of Barrhead opposite the Barrhead North master plan (Policy M3) where significant residential development is proposed in the short to medium term. The northern extent of the site consists of broken hedgerows and mature tree field boundaries, the western boundary is defined by Grahamston Road with St Conval's Cemetery to the east and Blackbyres Road to the South. A redundant railway line is located within the site close to the western boundary.
- The Landscape Character assessment identifies the landscape sensitivity as medium to high, visual sensitivity as medium to high, and overall green belt sensitivity as strong.
- The scale of development proposed would result in a significant intrusion into the Greenbelt. The site makes a positive contribution to this part of the Green Belt and acts as a strong green gateway into/out of Barrhead when approaching from the North. Development would extend the area of visible built development further east and would require sensitive boundary landscaping to minimise the visual impact of development. The site forms part of the wider green network under Policy D4.
- It is recognised that the development framework indicates that mitigation planting will assist with strengthening the landscape character and urban edge and will help to screen development. Additionally the provision of a green network of open space could provide links to the countryside beyond and increase the sites bio-diversity and recreational value.
- The proposal also seeks to provide 12ha of amenity parkland and land for the potential expansion of St Conval's Cemetery.
- It is accepted that a house builder is actively involved with the site. The representation also states that that the site is effective, free from constraints, and deliverable.
- Notwithstanding the above, the site given its location in the Green Belt is not supported by the Proposed Plan. Other more sustainable sites have been identified in the Plan to meet housing needs.
- As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.
- It is recommended that this site continues to be allocated as Green Belt.
- It is not proposed to modify the Plan based upon the above.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue 21</b>	Submitted Housing Supply Busby	
<b>Development plan reference:</b>	Policy SG1: Housing Supply, Delivery and Phasing Schedule 15: Housing Sites	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Mctaggert &amp; Mickel (459/1)  Eddie Casey (466/1)  CALA Homes (West) and Lynch Homes (467/1)  Romano Family (494/1)  Taylor Wimpey (497/1)</p>		
<b>Provision of the development plan to which the issue relates:</b>	<p>Chapter 4: Promoting Sustainable and Inclusive Economic Growth  Alternative Housing Development Proposals:</p> <ul style="list-style-type: none"> <li>• LDP2-06 Hill Crescent, Busby (CS031)</li> <li>• LDP2-12 Westerton Lane, Busby (CS050)</li> <li>• LDP2-13 Easter Busby (CS051)</li> <li>• LDP2-21 Kittoch House, Carmunnock Road, Busby (SMIR01)</li> <li>• LDP2-22 Easterton Avenue (MIR7/CS063)</li> </ul> <p>Supporting documents:</p> <ul style="list-style-type: none"> <li>• Site Evaluation</li> </ul>	
<b>Planning authority's summary of the representation(s):</b>		
<p><b><u>(a) LDP2-06 Hill Crescent, Busby (CS031)</u></b></p> <p><u>Mctaggert &amp; Mickel (459/1)</u></p> <ul style="list-style-type: none"> <li>• The site is subject of a planning application (ref. 2018/0398/TP) for the 'Erection of 4 dwellinghouses which was minded to grant subject to S75 (committee on 17th May 2019).</li> <li>• By way of relevant precedent Mac&amp;Mic highlight LDP site ref. SG1.33, Whitecraigs Bowling Club is allocated in the Proposed Plan for 6 dwellinghouses by virtue of it now benefiting from planning permission for development. Given the position, is essentially the same for Hill Crescent we would ask that the Hill Crescent site be duly shown as allocated in the Proposed Plan for the development of 4 dwellinghouses and added to the list of Housing Sites at Schedule 15.</li> </ul> <p><b><u>(b) LDP2-12 Westerton Lane, Busby (CS050)</u></b></p> <p><u>Eddie Casey (466/1)</u></p>		

- Site offers opportunity to secure a small-scale residential extension to the urban area of Busby that can provide high quality new housing (including affordable housing).
- The Site lies within a highly sustainable location terms of sustainable transport linkages and is suitable for housing delivery within the short term.
- Due to the scale of proposal (ie 20 units) there would not be any significant impact on educational requirements. Programme of phasing could coincide with school infrastructure improvements to avoid any potential infrastructure capacity restrictions within the catchment area. The Council has not considered that the phasing of forthcoming sites could be applied to restrict development until such improvements to educational infrastructure has taken place.
- The Site is effective.
- The nature of the surrounding road network is considered sufficient to accommodate the likely traffic demands associated with the proposed development. Upgrade works to Westerton Lane could also facilitate the required vehicular access.
- Proposal would not compromise the objectives of proposal D8.9 to provide core path and local access network to Busby Station and Williamwood High School.
- Representee submitted a Development Framework in support of their proposal, including site layout and transport statement.

#### **(c) LDP2-13 Easter Busby (CS051)**

##### CALA Homes (West) and Lynch Homes (467/1)

- Objects to the non-allocation of land at Easter Busby (CS051) for residential development 200 homes including affordable housing focussed on the Later Living market and specialist mixed tenure scheme for the over 55's.
- Site offers the opportunity exists to create a high quality new neighbourhood in a highly sustainable location which integrates with the existing village and offers a wide range of housing for local people.
- By virtue of its presence within a strong housing market area, and its highly sustainable location, the site has strong potential as a housing site.
- Representee submitted a Landscape & Visual Assessment, Transport & Access Appraisal, Phase 1 Habitat Survey and Civil Engineering Review and housing land supply statement in support of their proposal.
- It is stated that the site is in a highly sustainable and accessible location and is within easy walking distance to a range of services and amenities (and public transport modes).
- There are no site constraints which are insurmountable and any remaining 'concerns' which the Council may have in relation to technical constraints can, and will, be addressed at a later stage
- The site is effective and the development proposals are deliverable.

#### **(d) LDP2-21 Kittoch House, Carmunnock Road, Busby (SMIR01)**

##### Romano Family (494/1)

- Site is effective.
- There are no physical restraints to housing delivery.
- There is developer interest.

- There are no infrastructure constraints - technical note supplied demonstrating vehicular access is feasible.
- The site can deliver significant local benefits, in relation to affordable housing, education and amenity space. The proposed development has the opportunity to include a comprehensive green network and enhance the settlement edge.
- Committed to housing of different types and tenures.
- The site is a logical expansion of Busby.

**(e) LDP2-22 Easterton Avenue, Busby (MIR7/CS043)**

Taylor Wimpey (497/1)

- Objects to the non-allocation of land at Easterton Avenue (CS043) for residential development.
- Identified as a preferred site in the MIR but not taken through to the Proposed Plan as an allocated housing site.
- The site is effective.
- The site Evaluation in 2016 scored the site at 19, the highest score of any new potential housing sites confirming the site as "preferred". The 2019 evaluation scored the site at 19 but the site was no longer preferred it was to remain as greenbelt.
- Representee submitted a Development Framework in support of their proposal. All issues: visual impact, greenbelt, ecology, accessibility, design and sustainability have been investigated.
- Taylor Wimpey are in a position to deliver all 20 affordable units in SG4.2 and provide a further 25% affordable units on the remainder of the CS043 site. This would provide well in excess of the requirement for 25% affordable. Policy SG4 can only be achieved by allocating sites for residential development.

**Modifications sought by those submitting representations:**

(a) LDP2-06 Hill Crescent, Busby (CS031)

Mctaggert & Mickel (459/1)

- Inclusion of the site within Schedule 15 of the Proposed LDP2 for residential development and identification on the associated Proposals Map.

(b) LDP2-12 Westerton Lane, Busby (CS050)

Eddie Casey (466/1)

- Inclusion of the site within Schedule 15 of the Proposed LDP2 for residential development and identification on the associated Proposals Map.
- Removal from the Green Belt.
- Request that the symbol for proposal D8.9 is moved further north, beyond the boundary of the Site, to show such connections would be provided out-with the Site.

(c) LDP2-13 Easter Busby (CS051)

CALA Homes (West) and Lynch Homes (467/1)

- Inclusion of the site within Schedule 15 of the Proposed LDP2 for residential development and identification on the associated Proposals Map.
- Removal from the Green Belt.

(d) LDP2-21 Kittoch House, Carmunnock Road, Busby (SMIR01)  
Romano Family (494/1)

- Inclusion of the site within Schedule 15 of the Proposed LDP2 for residential development and identification on the associated Proposals Map.
- Removal from the Green Belt.

(e) LDP2-22 Easterton Avenue (MIR7/CS063)  
Taylor Wimpey (497/1)

- Inclusion of the site within Schedule 15 of the Proposed LDP2 for residential development and identification on the associated Proposals Map.
- Removal from the Green Belt.

**Summary of responses (including reasons) by planning authority:**

**OVERVIEW**

- Justification for the Development Strategy of the Plan is demonstrated under Issue 2 (Development Strategy). The Council's approach to housing supply is addressed under Issue 14 (Housing Supply, Delivery and Phasing) and Education Infrastructure under Issue 13 (Community and Education Facilities and Infrastructure). Under these issues it is clearly demonstrated that the Plan is providing an effective generous land supply in to meet the requirements of Scottish Planning Policy (SPP) (CD/@@) and Clydeplan (2017) (CD/@@) and that Education Infrastructure remains a significant constraint to further development being supported in the Proposed Plan. These issues conclude that further housing releases would have major impacts upon the existing education infrastructure across all sectors and both the Leven Valley and Eastwood areas.

**Site Evaluation**

- Representations for site (e) objected to the scoring and findings of the Site Evaluation (CD/@@).
- The site evaluation study was prepared to assist with the identification of sites to be included in the Proposed Plan. The assessment methodology along with the SEA, together provide a consistent, robust and objective framework for the assessment of land use proposals. The site evaluation methodology is thorough and robust and provides a fair and consistent method of ranking and comparing alternative sites.
- This approach has been applied consistently across all sites and has been agreed as an accepted methodology by Reporters at previous LDP examinations. The Council stands by the outcomes of these exercises.
- It is not proposed to modify the Plan based on the above.

**(a) LDP2-06 Hill Crescent, Busby (CS031)**

Mctaggert & Mickel (459/1)

- The Council acknowledge that the current planning application was minded to grant subject to the signing of a S75 agreement. However, this remains outstanding. The Council would only include the site in the LDP or the Housing land Audit once it had a consent and a signed S75 agreement.
- Reference is made to an application at the Whitecraigs Bowling Club. This site is under construction and has therefore been included in the Proposed Plan and HLA. The situation between the two sites can therefore not be concluded as being similar.
- It is not proposed to modify the Plan based upon the above.

**(b) LDP2-12 Westerton Lane, Busby (MIR5/CS050)**

Eddie Casey (466/1)

- An objection was received regarding the non-inclusion of the site as a preferred housing site under Policy SG1 and Schedule 15.
- This green field is located in the Green Belt and lies to the South western fringe of Busby. The site is bounded by Westerton Lane to the north and east, and mature tree belt to the south and west.
- The site was identified as a preferred housing site under Option 2A of the MIR (CD/@@) (MIR5). However, as explained under Issue 2 and Issue 13 analysis of education, demographic and housing data showed that further housing releases would have major impacts upon the existing education infrastructure. As such the proposal was not carried forward to the Proposed Plan.
- The Landscape Character assessment (CD/@@) identifies the landscape sensitivity as low, visual sensitivity as medium, and overall green belt sensitivity as moderate.
- The existing mature tree belt and Westerton Avenue/Lane provide robust boundaries. The release of this site may though expose a wider area of Green Belt to the South to development pressure. Development would extend the area of visible built development further south and would require sensitive boundary landscaping to minimise the visual impact of development. The site forms part of the wider green network under Policy D4.
- It is recognised that landscape proposals could create a stronger green belt boundary by strengthening and enhancing existing boundary planting to the southern boundary.
- The effectiveness and deliverability of the site have not been demonstrated and the Council is not aware of any current active house builder interest in the site.
- It is accepted the site is accessible to both bus and rail infrastructure.
- The Council is of the opinion that an access solution from Westerton Lane remains to be resolved due to land ownership constraints.
- The site given its location in the Green Belt is therefore not supported by the Proposed Plan. Other more sustainable sites have been identified in the Plan to meet housing needs.
- As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.
- It is recommended that this site continues to be allocated as Green Belt.
- It is not proposed to modify the Plan based upon the above.

**(c) LDP2-13 Easter Busby (CS051)****CALA Homes (West) and Lynch Homes (467/1)**

- An objection was received regarding the non-inclusion of the site as a preferred housing site under Policy SG1 and Schedule 15.
- This large green field is located in the Green Belt and lies to the Eastern fringe of Busby. It comprises agricultural land. It is bounded by Carmunnock Road to the North, East Kilbride Road to the south, an established residential estate to the west and a mature tree belt to the east which also forms the Council boundary.
- The Landscape Character assessment identifies the landscape sensitivity as medium to high, visual sensitivity as low, and overall green belt sensitivity as moderate to strong.
- The scale of development proposed would result in a significant intrusion into the Greenbelt. The site and wider area makes a positive contribution to this part of the Green Belt and acts as a strong green gateway when approaching Busby from the south. Development would extend the area of visible built development further east and would require sensitive boundary landscaping to minimise the visual impact of development. The site forms part of the wider green network under Policy D4.
- The site is contained within well-defined boundaries. The current green belt is formed by back gardens of houses. It is recognised that landscape proposals and the established woodland could create a future robust, long-term defensible green belt boundary.
- It is recognised that mitigation planting along the eastern and western edges of the site could assist with strengthening and enhancing the landscape character, create a visual buffer to the existing homes and enhancements to the existing tree belts could improve biodiversity.
- It is accepted that a house builder is now actively involved with the site. The representation also states that the site is effective and deliverable.
- It is accepted the site is accessible to both bus and rail infrastructure.
- Notwithstanding the above, the site given its location in the Green Belt is not supported by the Proposed Plan. Other more sustainable sites have been identified in the Plan to meet housing needs.
- As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.
- It is recommended that this site continues to be allocated as Green Belt.
- It is not proposed to modify the Plan based upon the above.

**(d) LDP2-21 Kittoch House, Carmunnock Road, Busby (SMIR01)****Romano Family (494/1)**

- An objection was received regarding the non-inclusion of the site as a preferred housing site under Policy SG1 and Schedule 15.
- This green field site is located in the Green Belt and lies to the Northern fringe of Busby. It comprises agricultural land. The site is bounded by Carmunnock Road with open fields beyond.
- A larger site has been promoted to the Proposed Plan than that submitted and assessed at MIR Stage. This is shown in the Title plan submitted with the representation.



- The Landscape Character assessment identifies the landscape sensitivity as medium to high, visual sensitivity as low, and overall green belt sensitivity as moderate to strong.
- The release of this site may expose a wider area of Green Belt to development pressure. Development would extend the area of visible built development further north, east and west and would require sensitive boundary landscaping to minimise the visual impact of development. The site forms part of the wider green network under Policy D4.
- No information on landscape mitigation has been submitted.
- The effectiveness and deliverability of the site have not been fully demonstrated and the Council is not aware of any active house builder interest in the site.
- It is accepted the site is accessible to both bus and rail infrastructure.
- The site given its location in the Green Belt is therefore not supported by the Proposed Plan. Other more sustainable sites have been identified in the Plan to meet housing needs.
- As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.
- It is recommended that this site continues to be allocated as Green Belt.
- It is not proposed to modify the Plan based upon the above.

**(e) LDP2-22 Easterton Avenue, Busby (MIR7/CS043)**

Taylor Wimpey (497/1)

- An objection was received regarding the non-inclusion of the site as a preferred housing site under Policy SG1 and Schedule 15.
- This large green field is located in the Green Belt and lies to the South Eastern fringe of Busby. It comprises agricultural land. It is bounded to the north by an established residential area, to the west by access track and railway, East Kilbride Road to the east with hedgerows and to the south with open views beyond.
- The site was identified as a preferred housing site under Option 2A of the MIR (CD/@@) (MIR7) to assist with the delivery of the adjacent affordable housing site SG4.2 (Proposed Plan ref). However, as explained under Issue 2 and Issue 13 analysis of education, demographic and housing data showed that further housing releases would have major impacts upon the existing education infrastructure. As such the proposal was not carried forward to the Proposed Plan.
- The site falls within an area of Green Belt that represents an important green corridor separating Busby from Thorntonhall.
- The Landscape Character assessment identifies the landscape sensitivity as low, visual sensitivity as medium, and overall green belt sensitivity as moderate.
- The scale of development proposed would result in a significant intrusion into the Greenbelt and reduction in the gap between Busby and Thorntonhall. The site and wider area makes a positive contribution to the landscape setting of this part of the Green Belt and acts as a strong green gateway into/out of Busby. The release of this site may also expose a wider area of Green Belt to the South to development pressure. Development would extend the area of visible built development further south and would require sensitive boundary landscaping to minimise the visual impact of development. The site forms part of the wider green network under Policy D4.
- The current green belt is formed by back gardens of houses in Easterton Avenue and Kipen Drive. It is recognised that landscape proposals could create a stronger

green belt boundary by providing defensible woodland structure planting to the eastern, western and southern boundaries.

- It is also recognised that mitigation planting could assist with strengthening and enhancing the landscape character, protect settlement separation and improve the urban edge. It is proposed that development would be kept north of the line formed by the access road to Busbyside and could be sensitively designed so as to fit with existing site topography. Land to the south of this would be subject to substantial woodland planting and would result in the creation of an extensive, public area of greenspace that would be added to the wider green network.
- It is accepted that a house builder is now actively involved with the site. The representation also states that the site is effective and deliverable and will deliver increased levels of affordable housing including the adjacent allocated housing site.
- It is accepted the site is accessible to both bus and rail infrastructure.
- Notwithstanding the above, the site given its location in the Green Belt is not supported by the Proposed Plan. Other more sustainable sites have been identified in the Plan to meet housing needs.
- As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.
- It is recommended that this site continues to be allocated as Green Belt.
- It is not proposed to modify the Plan based upon the above.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue 22</b>	Submitted Housing Supply Clarkston	
<b>Development plan reference:</b>	Policy SG1: Housing Supply, Delivery and Phasing Schedule 15: Housing Sites	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
Mctaggert & Mickel(460/1) (490/1)		
<b>Provision of the development plan to which the issue relates:</b>	Chapter 4: Promoting Sustainable and Inclusive Economic Growth Alternative Housing Development Proposals: <ul style="list-style-type: none"> <li>• LDP2-07 Land at Williamwood Golf Club</li> <li>• LDP2-20 Newford Farm, Clarkston (MIR03/CS023)</li> </ul> Supporting documents: <ul style="list-style-type: none"> <li>• Site Evaluation</li> </ul>	
<b>Planning authority's summary of the representation(s):</b>		
<p><b><u>(a) LDP2-07 Land at Williamwood Golf Club</u></b></p> <p><u>Mctaggert &amp; Mickel (460/1)</u></p> <ul style="list-style-type: none"> <li>• The site has been subject of a planning application (ref. 2019/0442/TP) for the 'Erection of 14 flats.</li> <li>• Development of the site and loss of this small area of urban greenspace will have no significant or adverse impact on the significant area of urban greenspace which constitutes the rest of the golf course, or the landscape character and amenity of the surrounding area, and development of the site will not result in any loss of public access. The site does not form a functional part of the golf course.</li> <li>• Sportscotland stated that they had no objection to the planning application for residential development on the site and recognised the Club has had a consistently falling membership over the last 10 years and are seeking to change this pattern through interventions.</li> <li>• Development will generate funds to help support improvements to the golf facility and therefore to the large urban greenspace area which the course constitutes and which will remain.</li> <li>• By way of relevant precedent Mac &amp; Mic highlight LDP site ref. SG1.33, Whitecraigs Bowling Club is allocated in the Proposed Plan for 6 dwellinghouses by virtue of it now benefiting from planning permission for development.</li> </ul> <p><b><u>(b) LDP2-20 Newford Farm, Clarkston (MIR03/CS023)</u></b></p> <p><u>Mctaggert &amp; Mickel Homes (490/1)</u></p> <ul style="list-style-type: none"> <li>• Objects to the non-allocation of land at Newford Farm, Clarkston (CS023) for residential development.</li> <li>• Identified as a preferred site in the MIR but not taken through to the Proposed Plan as an allocated housing site.</li> <li>• The site is effective.</li> </ul>		

- The Reporter who examined LDP1 concluded that if there was a need for future housing and release this site would merit consideration.
- The 2016 Site Evaluation scored the site with on one of the highest scores of 18 and recommended the site as a preferred site. The site Evaluation 2019 gives the same score of 18 but recommends the site remain greenbelt.
- Representee submitted a Development Framework in support of their proposal.
- Agree with the Homes for Scotland report on Education that concludes that there is more capacity within the Education estate than the Council suggests.
- The new Maidenhill Primary will expand school roll capacity and release capacity at Kirkhill. There is also capacity at St Clare's Primary. Amending catchment boundaries of secondary and a new approach to placing requests could increase school capacity. There is therefore capacity to accommodate pupils from this proposal.

#### **Modifications sought by those submitting representations:**

##### (a) LDP2-07 Land at Williamwood Golf Club

##### Mctaggert & Mickel (460/1)

- Inclusion of the site within Schedule 15 of the Proposed LDP2 for residential development and identification on the associated Proposals Map.

##### (b) LDP2-20 Newford Farm, Clarkston (MIR03/CS023)

##### Mctaggert & Mickel (490/1)

- Inclusion of the site within Schedule 15 of the Proposed LDP2 for residential development and identification on the associated Proposals Map.
- Removal from the Green Belt.

#### **Summary of responses (including reasons) by planning authority:**

##### **OVERVIEW**

- Justification for the Development Strategy of the Plan is demonstrated under Issue 2 (Development Strategy). The Council's approach to housing supply is addressed under Issue 14 (Housing Supply, Delivery and Phasing) and Education Infrastructure under Issue 13 (Community and Education Facilities and Infrastructure). Under these issues it is clearly demonstrated that the Plan is providing an effective generous land supply in to meet the requirements of Scottish Planning Policy (SPP) (CD/@@) and Clydeplan (2017) (CD/@@) and that Education Infrastructure remains a significant constraint to further development being supported in the Proposed Plan. These issues conclude that further housing releases would have major impacts upon the existing education infrastructure across all sectors and both the Leven Valley and Eastwood areas.

##### **Site Evaluation**

- Representations for site (b) objected to the scoring and findings of the Site Evaluation (CD/@@).
- The site evaluation study was prepared to assist with the identification of sites to be included in the Proposed Plan. The assessment methodology along with the SEA,

together provide a consistent, robust and objective framework for the assessment of land use proposals. The site evaluation methodology is thorough and robust and provides a fair and consistent method of ranking and comparing alternative sites.

- This approach has been applied consistently across all sites and has been agreed as an accepted methodology by Reporters at previous LDP examinations. The Council stands by the outcomes of these exercises.
- It is not proposed to modify the Plan based on the above.

**(a) LDP2-07 Land at Williamwood Golf Club**

Mctaggert & Mickel (460/1)

- An application 2019/0442/TP) for 14 flats was refused permission on 27 November 2019. The proposal was viewed contrary to Policy D1 of the adopted East Renfrewshire Local Development Plan. The application is currently at appeal ref (PPA-220-2060). The outcome of this appeal is yet to be determined.
- The Council would only include the site in the LDP or the Housing land Audit once it had a consent.
- Reference is made to an application at the Whitecraigs Bowling Club. This site is under construction and has therefore been included in the Plan and HLA. The situation between the two sites can therefore not be concluded as being similar.
- It is not proposed to modify the Plan based upon the above.

**(b) LDP2-20 Newford Farm, Clarkston (MIR3/CS023)**

Mctaggert & Mickel Homes (490/1)

- An objection was received regarding the non-inclusion of the site as a preferred housing site under Policy SG1 and Schedule 15.
- This large green field is located in the Green Belt and lies to the Southern fringe of Clarkston. It comprises agricultural land with trees and hedgerows. The site is bounded by Eaglesham Road to the east, Williamwood high school to the north and west with a mature tree belt to the south.
- The site was identified as a preferred housing site under Option 2A of the MIR (CD/@@) (MIR3). However, as explained under Issue 2 and Issue 13 analysis of education, demographic and housing data showed that further housing releases would have major impacts upon the existing education infrastructure. As such the proposal was not carried forward to the Proposed Plan.
- The Landscape Character assessment (CD/@@) identifies the landscape sensitivity as medium, visual sensitivity as medium, and overall green belt sensitivity as moderate to strong.
- The site and wider area makes a positive contribution to this part of the Green Belt and acts as a strong green gateway when approaching Clarkston from the north and south. Development would also reduce the gap between Clarkston and Waterfoot.
- Development would extend the area of visible built development further south, however this would be partially mitigated by the mature tree belt that forms the southern boundary and the houses at Millerston. The site forms part of the wider green network under Policy D4.
- It is recognised that mitigation planting could assist with strengthening and enhancing the landscape character, improve the urban edge and enhance the local

biodiversity through additional planting and a robust green and blue network. The proposal also seeks to mitigate potential views to development from Waterfoot.

- It is accepted that the site boundaries are well defined by hedgerows, Eaglesham Road and Williamwood High School.
- It is accepted that a house builder is now actively involved with the site. The representation also states that the site is effective and deliverable.
- Notwithstanding the above, the site given its location in the Green Belt is not supported by the Proposed Plan. Other more sustainable sites have been identified in the Plan to meet housing needs.
- As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.
- It is recommended that this site continues to be allocated as Green Belt.
- It is not proposed to modify the Plan based upon the above.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue 23</b>	Submitted Housing Supply Eaglesham	
<b>Development plan reference:</b>	Policy SG1: Housing Supply, Delivery and Phasing Schedule 15: Housing Sites	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
Cala Homes (West) (464/1) (464/2) (464/8) Stewart Milne (488/1)		
<b>Provision of the development plan to which the issue relates:</b>	Chapter 4: Promoting Sustainable and Inclusive Economic Growth Alternative Housing Development Proposals: <ul style="list-style-type: none"> <li>• LDP2-11 Humbie Road, Eaglesham (CS061)</li> <li>• LDP2-18 Waukers Farm, Eaglesham (MIR02/CS016)</li> </ul> Supporting Documents: <ul style="list-style-type: none"> <li>• Site Evaluation</li> <li>• Strategic Environmental Assessment</li> </ul>	
<b>Planning authority's summary of the representation(s):</b>		
<p><b><u>(a) LDP2-11 Humbie Road, Eaglesham (CS061)</u></b></p> <p><u>Cala Homes (West) (464/1) (464/2) (464/8)</u></p> <ul style="list-style-type: none"> <li>• Objects to the non-allocation of land at Humbie Road, Eaglesham (CS061) for residential development of 100 homes including 25% affordable.</li> <li>• Should it be determined that there is a requirement to allocate additional housing sites to ensure that an effective housing land supply is provided, the site at Humbie Road, Eaglesham is an appropriate site for residential development.</li> <li>• Representee submitted a development framework and housing land supply statement in support of their proposal.</li> <li>• The site is also considered to be meet the tests of effectiveness set out in PAN 2/2010.</li> <li>• The site will meet the requirements of Scottish Planning Policy and Clydeplan. The proposal can make a valuable contribution to the effective housing land supply during the period of the Proposed LDP 2 as well as any future development strategy.</li> <li>• Query the site evaluation and SEA evaluation and scoring of sites. State that the site should have been scored more positively for Q2 (Site location), Q3 (Impact of Development), Q7 (Accessibility to services/facilities) and Q9 (Constraints).</li> <li>• The updated SEA Assessment also demonstrates that the proposal will have an overall positive impact on the environment.</li> </ul> <p><b><u>(b) LDP2-18 Waukers Farm, Eaglesham (MIR02/CS016)</u></b></p> <p><u>Stewart Milne (488/1)</u></p> <ul style="list-style-type: none"> <li>• Objects to the non-allocation of land at Waukers Farm, Eaglesham (CS016) for residential development.</li> </ul>		

- Identified as a preferred site in the MIR but not taken through to the Proposed Plan as an allocated housing site.
- Representee submitted a Development Framework in support of their proposal.
- The Site's location on the southern edge of Eaglesham will ensure that the development of the Site would provide controlled edge of settlement growth in line with the Councils development strategy Option 2A as identified in the Main Issues Report.
- The Site is well located in relation to local amenities and public transport facilities in the surrounding area.
- Query the Site Evaluation. The Site scored a '1' in relation to Question 3: Impact of Development'. It is considered that the site could be viewed as having a neutral/beneficial impact on the landscape character or setting of the settlement and should be given a scoring of '3'.

#### **Modifications sought by those submitting representations:**

##### (a) LDP2-11 Humbie Road, Eaglesham (CS061) Cala Homes (West) (464/2)

- Inclusion of the site within Schedule 15 of the Proposed LDP2 for residential development and identification on the associated Proposals Map.
- Removal from the Green Belt.

##### (b) LDP2-18 Waukers Farm, Eaglesham (MIR02/CS016) Stewart Milne (488/1)

- Inclusion of the site within Schedule 15 of the Proposed LDP2 for residential development and identification on the associated Proposals Map.
- Removal from the Green Belt.

#### **Summary of responses (including reasons) by planning authority:**

##### **OVERVIEW**

- Justification for the Development Strategy of the Plan is demonstrated under Issue 2 (Development Strategy). The Council's approach to housing supply is addressed under Issue 14 (Housing Supply, Delivery and Phasing) and Education Infrastructure under Issue 13 (Community and Education Facilities and Infrastructure). Under these issues it is clearly demonstrated that the Plan is providing an effective generous land supply in to meet the requirements of Scottish Planning Policy (SPP) (CD/@@) and Clydeplan (2017) (CD/@@) and that Education Infrastructure remains a significant constraint to further development being supported in the Proposed Plan. These issues conclude that further housing releases would have major impacts upon the existing education infrastructure across all sectors and both the Leven Valley and Eastwood areas.

##### **Site Evaluation and Strategic Environmental Assessment**

- Representations for sites (a) and (b) objected to the scoring and findings of the Site Evaluation (CD/@@) and Strategic Environmental Assessment (CD/@@).



- The site evaluation study was prepared to assist with the identification of sites to be included in the Proposed Plan. The assessment methodology along with the SEA, together provide a consistent, robust and objective framework for the assessment of land use proposals. The site evaluation methodology is thorough and robust and provides a fair and consistent method of ranking and comparing alternative sites.
- The SEA clearly identifies environmental effects on policies and proposals and potential mitigation measures. Comments from the SEA gateway and other organisations will inform the next stage of the SEA process as referred to further under Issue 1.
- This approach has been applied consistently across all sites and has been agreed as an accepted methodology by Reporters at previous LDP examinations. The Council stands by the outcomes of these exercises.
- It is not proposed to modify the Plan based on the above.

**(a) LDP2-11 Humbie Road, Eaglesham (CS061)**

Cala Homes (West) (464/1) (464/2) (464/8)

- An objection was received regarding the non-inclusion of the site as a preferred housing site under Policy SG1 and Schedule 15.
- This large green field is located in the Green Belt and lies to the North western fringe of Eaglesham. The site is bounded by Humbie Road to the north, an existing residential estate to the east and south with open fields and mature hedgerows to the west and beyond.
- The Landscape Character assessment (CD/@@) identifies the landscape sensitivity as medium to high, visual sensitivity as medium, and overall green belt sensitivity as moderate to strong.
- The site acts as a strong green gateway and is particularly prominent when travelling into Eaglesham along Humbie Road. The site contributes to the open and rural setting of the village. The sloping topography of the site would enhance the visibility of any development. The release of this site may also expose a wider area of Green Belt to development pressure. Development would extend the area of visible built development further west and would require sensitive boundary landscaping to minimise the visual impact of development. The site and wider area provides bio-diversity and green network value.
- The current green belt is formed by back gardens. It is recognised that landscape proposals could create a stronger green belt boundary by providing a tree belt along the western and south western site boundary and via other structure planting. Enhancements to the existing tree belts could improve biodiversity. However, the development would be highly visible until these landscape features had matured. In addition, development would be at the expense of a major incursion into a very visible section of the green belt and would undermine the open and rural setting of Eaglesham.
- Strategic Policy 1 states that development in the rural settlements will be limited to 'infill' development compatible with the character, amenity and settlement pattern. The size of the proposed development is far greater than the size of a development that could be described as 'infill'.
- It is accepted that a house builder is now actively involved with the site. The representation also states that the site is effective and deliverable.
- The site given its location in the Green Belt is therefore not supported by the Proposed Plan. Other more sustainable sites have been identified in the Plan to meet housing needs.

- As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.
- It is recommended that this site continues to be allocated as Green Belt.
- It is not proposed to modify the Plan based upon the above.

**(b) LDP2-18 Waukers Farm, Eaglesham (MIR2/CS016)**

Stewart Milne (488/1)

- An objection was received regarding the non-inclusion of the site as a preferred housing site under Policy SG1 and Schedule 15.
- This large green field is located in the Green Belt and lies to the South Eastern fringe of Eaglesham. This green field site is bounded by Strathaven Road and an existing residential estate to the west, a hedgerow to the south with open fields beyond.
- The site was identified as a preferred housing site under Option 2A of the MIR (CD/@@) (MIR2) However, as explained under Issue 2 and Issue 13 analysis of education, demographic and housing data showed that further housing releases would have major impacts upon the existing education infrastructure. As such the proposal was not carried forward to the Proposed Plan.
- The site falls within 2 landscape character areas. The Landscape Character assessment identifies the larger area to the east as landscape sensitivity as medium to high, visual sensitivity as medium, and overall green belt sensitivity as moderate to strong. The Landscape Character assessment identifies the smaller area to the south as landscape sensitivity as medium to high, visual sensitivity as low to medium, and overall green belt sensitivity as weak to moderate.
- The site contributes to the open and rural setting of the village. The site has an important influence on views in/out of Eaglesham when approaching along Strathaven Road and Cheapside Street. The release of this site may also expose a wider area of Green Belt to development pressure. Further land to the east is also in the same ownership. Development would extend the area of visible built development further east and south and would require sensitive boundary landscaping to minimise the visual impact of development. The site and wider area provides bio-diversity and green network value.
- The current green belt is formed by back gardens along Eglington Drive. It is recognised that landscape proposals could create a stronger green belt boundary by providing structural planting along the eastern and southern site boundary, create a visual buffer to the existing homes and enhancements to the existing tree belts could improve biodiversity. Moving the green belt boundary southwards would help to square of the built form of this part of the village.
- Strategic Policy 1 states that development in the rural settlements will be limited to 'infill' development compatible with the character, amenity and settlement pattern. The size of the proposed development is far greater than the size of a development that could be described as 'infill'.
- It is accepted that a house builder is now actively involved with the site. The representation also states that the site is effective and deliverable.
- It is accepted the site is accessible to bus infrastructure.
- Notwithstanding the above, the site given its location in the Green Belt is not supported by the Proposed Plan. Other more sustainable sites have been identified in the Plan to meet housing needs.

- As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.
- It is recommended that this site continues to be allocated as Green Belt.
- It is not proposed to modify the Plan based upon the above.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue 24</b>	Submitted Housing Supply Newton Mearns	
<b>Development plan reference:</b>	Policy SG1: Housing Supply, Delivery and Phasing Schedule 15: Housing Sites	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Taylor Wimpey (172/1) (172/2)          Persimmon Homes (382/1) (384/1)          Mactaggert &amp; Mickel (457/1) (462/1) (462/2) (509/1)          Mr William Clifford (470/1)          Homeground Ltd (477/1)          Highloch Ltd (478/1)          Stewart Milne Homes Ltd (487/1)          Church of Scotland General Trustees (499/1) (499/3)          Robertson Homes (506/1) (506/2) (506/3)</p>		
<b>Provision of the development plan to which the issue relates:</b>	<p>Chapter 4: Promoting Sustainable and Inclusive Economic Growth          Alternative Housing Development Proposals:</p> <ul style="list-style-type: none"> <li>• LDP2-02 Humbie Road/Mearns Road, Newton Mearns (CS025)</li> <li>• LDP2-03 Burnhouse Farm Parcel 1 and 2 (CS065)</li> <li>• LDP2-03 Burnhouse Farm Parcel 1 and 2 (CS064)</li> <li>• LDP2-05 Broomburn Drive, Newton Mearns (CS029/ MIR04)</li> <li>• LDP2-09 Barcapel, Newton Mearns (CS013)</li> <li>• LDP2-14 Land at Humbie Road (SMIR06)</li> <li>• LDP2-15 Ryatt, Newton Mearns (CS035)</li> <li>• LDP2-16 Pilmuir Quarry (CS045)</li> <li>• LDP2-17 Barrance Farm Newton Mearns (CS007&amp; CS008/MIR01)</li> <li>• LDP2-23 Mearns Kirk Glebe (SMIR03)</li> <li>• LDP2-27 Humbie Road, Newton Mearns (CS046)</li> <li>• LDP2-29 Whitecraigs Golf Course (CS017 + new areas)</li> </ul> <p>Supporting Documents:</p> <ul style="list-style-type: none"> <li>• Site Evaluation</li> <li>• Strategic Environmental Assessment</li> </ul>	
<b>Planning authority's summary of the representation(s):</b>		
<p><b><u>(a) LDP2-02 Humbie Road/Mearns Road, Newton Mearns (CS025)</u></b></p> <p><u>Taylor Wimpey (172/1) (172/2)</u></p> <ul style="list-style-type: none"> <li>• Objects to the non-allocation of land at Humbie Road/Mearns Road, Newton Mearns (CS025) for residential development for 250 homes including 25% affordable.</li> <li>• The site is also considered to be meet the tests of effectiveness set out in PAN 2/2010.</li> </ul>		

- Incumbent on the Plan to provide a range and choice of housing sites to meet housing needs.
- Representee submitted a Masterplan and a Transport Appraisal in support of their objection
- Previous planning application for residential development on part of the site was supported by the Council.
- New Co-op under construction which will provide a local shopping facility to serve the site.
- Query the site evaluation and scoring of sites. State that the site should have been scored more positively for Q5 (Natural Heritage) and Q9 (Constraints).
  - Q5: The majority of the LBS designated area falls out with CS025 and impact will be minimal. The scoring should be revised upwards from current score 1 to 3; and
  - Q9: it is not accepted there is a flood risk and score should be revised from 1 to 3.

**(b) LDP2-03 Burnhouse Farm Parcel 1 and 2 (CS065)**

Persimmon Homes (382/1)

- Objects to the non-allocation of land at Burnhouse Farm, Newton Mearns (Ref: CS065) for residential development.
- Would help to provide a range and choice of family homes at an affordable level whilst also promoting sustainable and inclusive economic growth.
- The site is located within a sustainable location within Newton Mearns is not constrained and can be developed within the plan period.
- The Councils own 'Site Evaluation Assessment' scored the site favourably against a number of criteria. The scoring was greater or equal than the majority of sites of the preferred sites.
- The 'Site Evaluation Assessment' and 'Green Belt Landscape Character Assessment' have not considered is the recent construction of St Clare's Primary and Calderwood Lodge Primary to the east of the proposed site which has altered the relationship between Newton Mearns and the Green Belt to the south. The school development has set a precedent by developing to the south of Waterfoot Road whilst also ensuring that site CS065 is in a sustainable location given its proximity to both new primary schools and Mearns Castle High School.
- The allocation of site CS065 for housing can also continue the tree belt associated with the new schools to enhance biodiversity within the area and form a robust Green Belt boundary over time – addressing the 'moderate to weak' Greenbelt boundary in this area of Newton Mearns whilst integrating with the surrounding landscape.
- There are no constraints to development and no insurmountable environmental pressures facing the site.
- In response to (MIR) assessment Persimmon Homes instructed a number of studies Ecological survey, Archaeological Survey, Flood Risk Assessment and Landscape strategy plan which concluded that there were no significant adverse physical or environmental impacts.
- Persimmon build smaller more affordable homes which many are eligible for help to buy assistance.
- Site offers opportunity to provide generous amount of affordable housing over and above 25% (41 affordable houses).

- The Newton Mearns housing market would benefit from new, smaller, housing stock to allow existing owner occupiers to downsize.

### **(c) LDP2-03 Burnhouse Farm Parcel 1 and 2 (CS064)**

#### **Persimmon Homes (384/1)**

- Objects to the non-allocation of land at Burnhouse Farm, Newton Mearns (Ref: CS064) for residential development.
- Proposal would help provide a range of family homes at affordable levels whilst supporting sustainable & inclusive economic growth (1 of 3 Proposed Plan strategic objectives).
- Site located within sustainable Newton Mearns location, not constrained and can be developed within the plan period.
- The Council's 'Site evaluation Assessment' scores site (CS064) favourably being greater or equal than the majority of preferred sites.
- The 'Site Evaluation Assessment' and 'Green Belt Landscape Character Assessment' have not considered is the recent construction of St Clare's Primary and Calderwood Lodge Primary to the east of the proposed site which has altered the relationship between Newton Mearns and the Green Belt to the south. The school development has set a precedent by developing to the south of Waterfoot Road whilst also ensuring that site CS064 is in a sustainable location given its proximity to both new primary schools and Mearns Castle High School.
- Allocation of (CS064) would round off settlement boundary tying into adjacent development. This would also address the 'moderate to weak' greenbelt boundary in the area.
- There are no constraints to development and no insurmountable environmental pressures facing the site.
- In response to (MIR) assessment Persimmon Homes instructed a number of studies Ecological survey, Archaeological Survey, Flood Risk Assessment and Landscape strategy plan which concluded that there were no significant adverse physical or environmental impacts.
- Persimmon build smaller more affordable homes which many are eligible for help to buy assistance.
- Site offers opportunity to provide generous amount of affordable housing over and above 25%.
- Whilst this will benefit for time buyers it will also appeal to downsizers.

### **(d) LDP2-05 Broomburn Drive, Newton Mearns (CS029 / MIR04)**

#### **Mactaggert & Mickel (457/1)**

- The site is currently allocated for development in the adopted LDP1 (Policy D13.21 new health centre/nursery school) which confirms that the Council has established a view that the site can and should accommodate development. The 2016 MIR reinforces that by affording 'Preferred' status to the site for housing development.
- The site is effective and could deliver approximately 60 houses incorporating 50% affordable housing over the Plan period alongside new retail/commercial and community facilities.
- A Transport Assessment will be undertaken, and an appropriate access solution will be achieved.

- Appropriate mitigation and enhancements will be provided to address any impacts upon greenspace. Play area will be retained.
- It is also acknowledged that a Flood Risk Assessment is required, and this will inform the development of detailed proposals. Preliminary assessment work indicates that the flooding impacts from the Broom Burn watercourse, which runs to the north-east, are only very limited and potentially affected areas can be left free of development.

**(e) LDP2-09 Barcapel, Newton Mearns (CS013)**

**Mactaggart & Mickel (462/1) (462/2)**

- Objects to the non-allocation of land at Barcapel, Newton Mearns (Ref: CS013) for residential development.
- Newton Mearns is an area of proven demand for housing, and allocation of the land at Barcapel can deliver additional new housing, including 25% affordable, and over the Plan period.
- The site was submitted to the preceding stages of the LDP process on behalf of Elphinstone Barcapel Ltd, and is afforded considered in the October 2019 Site Evaluation document which accompanies the Proposed Plan, and is identified under reference CS013. CS013 is now under the ownership of Mactaggart & Mickel.
- To help ensure that there is a suitably generous supply of land available for housing development the land at Barcapel should be added to the list of Housing Sites in LDP2.
- Query the site evaluation scoring and state that the site should have been scored more positively for Q4 (Ownership/Market Interest), Q8 (Accessibility to Public Transport) and Q9 (Constraints).
- Site scorings should be increased from (0) to (3) for Q4 (Ownership/Market Interest), from (1) to (3) for Q8 (Accessibility to Public Transport) and from (0) to (2) for Q9 (Constraints), which in turn results in an increase in the overall site score from (9) to (16).
- The site is also considered to be meet the tests of effectiveness set out in PAN 2/2010.

**(f) LDP2-14 Land at Humbie Road (SMIR06)**

**Mr William Clifford (470/1)**

- Objects to the non-allocation of land at Humbie Road, Newton Mearns, Newton Mearns (Ref: SMIR06) for residential development of 50 homes.
- It is considered that this site could be developed for low density, large scale family housing.
- The site is also considered to be meet the tests of effectiveness set out in PAN 2/2010.
- The site is free from physical constraints.
- Humbie Road is a desirable location and likely to attract market interest.
- The Site Evaluation Report (October 2019) scores all sites submitted at the Call for Sites and Main Issues Report stage. The scoring criteria is clearly set out in the report, however there is no commentary on any of the sites to justify the scoring given to each site.

**(g) LDP2-15 Ryatt, Newton Mearns (CS035)****Homeground Ltd (477/1)**

- Objects to the non-allocation of land at Ryatt, Newton Mearns (CS035) for residential development.
- The proposed Local Development Plan 2 proposes a high risk strategy of heavy reliance upon historical release of potentially ineffective and illogical sites which will result in the Council failing to meet its housing supply targets.
- The land at Ryatt is capable of effective delivery with immediate access to infrastructure including drainage capacity, which is an obstacle to other allocated sites within East Renfrewshire.
- The site is brownfield.
- The land was previously allocated for industrial development in the East Renfrewshire Local Plan (2011) as a Single User Inward Investment site. The principle of development on this site has therefore been established previously.
- The site is uniquely suitable for low density, high quality, environmentally sensitive housing development.
- The site is therefore highly accessible and close to transport links, community uses and services (Within walking distances of bus stops, Isobel Mair school, Eastwood High, Greenlaw Village Centre).
- Larger parcel of land such will also enable development to be environmentally led.
- Broaden the range and choice of location for new housing.
- Sites which were included in the adopted LDP have not come forward for development despite being granted planning permission.
- Site has strong boundaries.
- Inclusion of this land for development as a masterplanned site will enable the implementation of a key infrastructure project to link to Junction 4 of the M77, which will assist in meeting Strategic objectives to promote access to the Dams to Darnley Country Park and the regeneration and promotion of Barrhead as a strategic business and industrial location.
- Query the site evaluation and scoring of sites. Suggest a lower density of 250-300 units compared to 500 as stated in Site Evaluation. The site should achieve a high positive score against any site evaluation assessment.

**(h) LDP2-16 Pilmuir Quarry (CS045)****Highloch Ltd (478/1)**

- The site is a major public safety hazard and is environmentally degraded, there is now an opportunity for the emerging LDP to recognise the former quarry as a brownfield redevelopment opportunity.
- It is envisaged that the proposed redevelopment will enable the restoration of the brownfield site and provide approximately 35 to 50 residential properties, roads and pedestrian infrastructure, leisure uses and amenity space
- A sensitive, enabling residential led mixed use development would not only maintain the landscape integrity, but enhance the landscape setting at this location and would inhibit any future development pressure to use the quarry as a landfill site, or other potentially 'bad neighbour' use.



**(i) LDP2-17 Barrance Farm Newton Mearns (CS007 & CS008/MIR1)**Stewart Milne Homes Ltd (487/1)

- Objects to the non-allocation of land at Barrance Farm, Newton Mearns (Ref: (CS007 & CS008/ MIR1) for residential development.
- Identified as a preferred site in the MIR but not taken through to the Proposed Plan as an allocated housing site.
- The site evaluation which supports the LPD2 is the same as the MIR but reaches a different conclusion.
- Representee submitted a Development Framework in support of their proposal.
- 3 options are provided as to how development could be delivered.

**(j) LDP2-23 Mearns Kirk Glebe (SMIR03)**Church of Scotland General Trustees (499/1) (499/3)

- Objects to the non-allocation of land at Mearns Kirk, Newton Mearns (SMIR03) for residential development.
- Object to site being designated as Protected open space under Policy D5.
- Acknowledge that the Glebe contributes to setting of Listed Kirk.
- Proposal would involve the redevelopment of the manse, provide a new access from Eagelsham Road and an improved car park.
- Only part of the SMIR03 site would be developed with the rest remaining as open space.
- The site is also considered to be meet the tests of effectiveness set out in PAN 2/2010.
- Site has been marketed with confirmed interest from house builders.
- The site evaluation scored the site as 8. Refute this score and suggest that the total score should be 21.
- The site has no particular recreational or landscape function or nature biodiversity value.

**(k) LDP2-27 Humbie Road, Newton Mearns (CS046)**Robertson Homes (506/1) (506/2) (506/3)

- Objects to the non-allocation of land at Humbie Road, Newton Mearns (CS046) for residential development of 95 homes.
- Objection that the Proposed LDP2 does not include any new housing sites based upon justification that there is insufficient education capacity to support additional residential allocations.
- The site is located within a sustainable location with easy access to local amenities.
- Should it be determined that there is a requirement to allocate additional housing sites to ensure that an effective housing land supply is provided, the site at Humbie Road, Newton Mearns is an appropriate site for residential development.
- Representee submitted a development framework in support of their proposal.
- The site meets the requirements of Scottish Planning Policy and Clydeplan Strategic Development Plan. The proposal can make a valuable contribution to the effective housing land supply during the period of the Proposed LDP 2 as well as any future development strategy.

- Query the site evaluation and SEA evaluation and scoring of sites. State that the site should have been scored more positively for Q2 (Site Location), Q3 (Impact of Development).
- The updated SEA Assessment also demonstrates that the proposal will have an overall positive impact on the environment.

**(I) LDP2-29 Whitecraigs Golf Course (CS017 + new areas)**

Mactaggart & Mickel (509/1)

- Objects to the non-allocation of land at Whitecraigs Golf Course, Newton Mearns for residential development.
- Integrated masterplan submitted with representation which promotes a series of golf course improvements, including extension of the course onto part of the land at Barcapel, and associated enabling residential development on four parcels of land – three within the existing course and one on the land at Barcapel - which will generate funds to facilitate the golf course improvements and will not result in any loss or diminution of the outdoor sports facility. The masterplan has also been informed by preliminary studies of transport/access and drainage.
- The proposals which will generate funds to facilitate a series of identified improvements to the golf course/club.
- Four residential sites promoted within masterplan which the representation states meet the required tests of effectiveness. The four sites have a total capacity of approximately 200 residential units, which would deliver approximately 150 owner occupied units and 50 affordable homes:
  - Site A (existing part of course/adjacent to existing residential flats at Whitecraigs Court) –potential for approximately 24 houses and 57 apartments (in 3 blocks);
  - Site B (existing part of course/Ayr Road frontage/existing line of conifers) - potential for approximately 45 apartments in 3 blocks;
  - Site C (existing part of course/to the rear of Barrhead Travel on Ayr Road, and between Netherton Road and Capel Avenue) - potential for approximately 9 houses and 19 apartments in 1 blocks (previous Council ref. CS017 and CS038). McCarthy & Stone and Cala Homes do not now have an interest in this site.
  - Site D (not within existing course/land at Barcapel) –potential for approximately 37 detached and semi-detached houses (previous (Council ref. CS013).
- The four residential sites are all located within the urban area and all are within a short walking distance of shops, bus stops and train stations, at both Whitecraigs and Patterton. The sites are all modestly sized and can accommodate discrete high quality residential developments, and due to their central location, all of the sites are sustainably located.

**Modifications sought by those submitting representations:**

(a) LDP2-02 Humble Road/Mearns Road, Newton Mearns (CS025)  
Taylor Wimpey (172/1)

- Inclusion of the site within Schedule 15 of the Proposed LDP2 for residential development and identification on the associated Proposals Map.
- Removal from the Green Belt under Policy D3.

(b) LDP2-03 Burnhouse Farm Parcel 1 and 2 (CS065)

Persimmon Homes (382/1)

- Inclusion of the site within Schedule 15 of the Proposed LDP2 for residential development and identification on the associated Proposals Map.
- Removal from the Green Belt under Policy D3.

(c) LDP2-03 Burnhouse Farm Parcel 1 and 2 (CS064)

Persimmon Homes (384/1)

- Inclusion of the site within Schedule 15 of the Proposed LDP2 for residential development and identification on the associated Proposals Map.
- Removal from the Green Belt under Policy D3.

(d) LDP2-05 Broomburn Drive, Newton Mearns (CS029 / MIR04)

Mactaggert & Mickel (457/1)

- Inclusion of the site within Schedule 15 of the Proposed LDP2 for residential development and identification on the associated Proposals Map.
- Inclusion of the site within Schedule 8 of the Proposed LDP2 for community uses and identification on the associated Proposals Map.
- Inclusion of the site within Schedule 20 of the Proposed LDP2 for retail uses and identification on the associated Proposals Map.

(e) LDP2-09 Barcapel, Newton Mearns (CS013)

Mactaggert & Mickel (462/1) (462/2)

- Inclusion of the site within Schedule 15 of the Proposed LDP2 for residential development and identification on the associated Proposals Map.
- Removal from the Green Belt under Policy D3.

(f) LDP2-14 Land at Humbie Road (SMIR06)

Mr William Clifford (470/1)

- Inclusion of the site within Schedule 15 of the Proposed LDP2 for residential development and identification on the associated Proposals Map.
- Removal from the Green Belt under Policy D3.

(g) LDP2-15 Ryatt, Newton Mearns (CS035)

Homeground Ltd (477/1)

- Inclusion of the site as a Strategic Development Opportunity designation under Policy M2: Strategic Development Opportunity. The site should be listed as Policy M2.3: M77 Strategic Development Opportunity – Ryatt, Newton Mearns.
- Inclusion of the site within Schedule 15 of the Proposed LDP2 for residential development and identification on the associated Proposals Map.
- Removal from the Green Belt under Policy D3.

- Removal from Green Network under Policy D4.

(h) LDP2-16 Pilmuir Quarry (CS045)

Highloch Ltd (478/1)

- Requests the allocation of the site as a Brownfield Redevelopment Opportunity.
- Removal from the Green Belt under Policy D3.

(i) LDP2-17 Barrance Farm Newton Mearns (CS007 & CS008/MIR01)

Stewart Milne Homes Ltd (487/1)

- Inclusion of the site within Schedule 15 of the Proposed LDP2 for residential development and identification on the associated Proposals Map.
- Removal from the Green Belt under Policy D3.

(j) LDP2-23 Mearns Kirk Glebe (SMIR03)

Church of Scotland General Trustees (499/1) (499/3)

- Inclusion of a portion of the site within Schedule 15 of the Proposed LDP2 for residential development and identification on the associated Proposals Map.
- Removal of relevant part of the site from the Policy D5: Open Space designation.

(k) LDP2-27 Humbie Road, Newton Mearns (CS046)

Robertson Homes (506/1)

- Inclusion of the site within Schedule 15 of the Proposed LDP2 for residential development and identification on the associated Proposals Map.
- Removal from the Green Belt under Policy D3.

(l) LDP2-29 Whitecraigs Golf Course (CS017 + new areas)

Mactaggart & Mickel (509/1)

- Inclusion of the site within Schedule 15 of the Proposed LDP2 for residential development and identification on the associated Proposals Map.
- Removal from the Green Belt under Policy D3.

**Summary of responses (including reasons) by planning authority:**

**OVERVIEW**

- Justification for the Development Strategy of the Plan is demonstrated under Issue 2 (Development Strategy). The Council's approach to housing supply is addressed under Issue 14 (Housing Supply, Delivery and Phasing) and Education Infrastructure under Issue 13 (Community and Education Facilities and Infrastructure). Under these issues it is clearly demonstrated that the Plan is providing an effective generous land supply in to meet the requirements of Scottish Planning Policy (SPP) (CD/@@) and Clydeplan (2017) (CD/@@) and that Education Infrastructure remains a significant constraint to further development being supported in the Proposed Plan. These issues conclude that further housing releases would have major impacts upon the existing education infrastructure across all sectors and both the Leven Valley and Eastwood areas.

### **Site Evaluation and Strategic Environmental Assessment**

- Representations for sites (a), (b), (c), (e), (f), (g), (i), (j) and (k) objected to the scoring and findings of the Site Evaluation (CD/@@) and Strategic Environmental Assessment (CD/@@).
- The site evaluation study was prepared to assist with the identification of sites to be included in the Proposed Plan. The assessment methodology along with the SEA, together provide a consistent, robust and objective framework for the assessment of land use proposals. The site evaluation methodology is thorough and robust and provides a fair and consistent method of ranking and comparing alternative sites.
- The SEA clearly identifies environmental effects on policies and proposals and potential mitigation measures. Comments from the SEA gateway and other organisations will inform the next stage of the SEA process as referred to further under Issue 1.
- This approach has been applied consistently across all sites and has been agreed as an accepted methodology by Reporters at previous LDP examinations. The Council stands by the outcomes of these exercises.
- It is not proposed to modify the Plan based on the above.

#### **(a) LDP2-02 Humbie Road/Mearns Road, Newton Mearns (CS025)**

##### Taylor Wimpey (172/1) (172/2)

- An objection was received regarding the non-inclusion of the site as a preferred housing site under Policy SG1 and Schedule 15.
- This large greenfield site is located in the Green Belt and lies to the southern fringe of Newton Mearns. The site is bounded by Humbie Road and Mearns road. It consists of undulating farmland with hedgerows and a significant number of mature trees. The areas to the west and north of the site, on the opposite sides of Mearns Road and Humbie Road, are established residential areas within Newton Mearns. Part of the site falls within a LBS.
- The site falls within 2 landscape areas. The Landscape Character assessment (CD/@@) identifies the landscape sensitivity of the majority of the site as medium, visual sensitivity as medium to high, and overall green belt sensitivity as moderate to strong. The Landscape Character assessment identifies the landscape sensitivity for the south western corner of the site as low to medium, visual sensitivity as medium to high, and overall green belt sensitivity as weak to moderate.
- The site and wider area has a rural appearance and makes a positive contribution to the landscape setting of this part of the Green Belt. The site acts as a strong green gateway into/out of Newton Mearns. Development would extend the area of visible built development further south and would require sensitive boundary landscaping to minimise the visual impact of development. The site forms part of the wider green network under Policy D4.
- It is recognised that landscape proposals could create a strong green belt boundary by strengthening and enhancing existing boundary planting to the southern boundary. Enhancements to planting along the existing field boundaries could also improve bio-diversity. However, it is viewed that Humbie Road and Means Road currently provide a robust boundary to the green belt.

- It is accepted that the site is accessible to a range of services and facilities in the local area. A new co-op is under construction which will provide a local shopping facility to serve the site once operational.
- A Previous planning application (2012/0103/TP) (CD/@@) for 85 houses was refused by the Council June 2013.
- It is accepted that a house builder is now actively involved with the site. The representation also states that the site is effective and deliverable.
- Notwithstanding the above, the site given its location in the Green Belt is not supported by the Proposed Plan. Other more sustainable sites have been identified in the Plan to meet housing needs.
- As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.
- It is recommended that this site continues to be allocated as Green Belt.
- It is not proposed to modify the Plan based upon the above.

**(b) LDP2-03 Burnhouse Farm Parcel 1 and 2 (CS065)**

Persimmon Homes (382/1)

- An objection was received regarding the non-inclusion of the site as a preferred housing site under Policy SG1 and Schedule 15.
- This greenfield site is located in the Green Belt and lies to the southern fringe of Newton Mearns. The site is bounded by Waterfoot Road to the north, Burnhouse Farm to the west and a farm access track/core path to the east. An existing hedgerow forms the southern boundary.
- The Landscape Character assessment identifies the landscape sensitivity site as medium, visual sensitivity as medium to high, and overall green belt sensitivity as moderate to strong.
- The site and wider has a rural appearance and makes a positive contribution to the landscape setting of this part of the Green Belt. The site acts as a strong green gateway when travelling along Waterfoot Road in either direction. The site is partially hidden when travelling from Mearns Castle High School towards Burnhouse Farm. The site becomes much more visible when approaching the farm buildings. Development would extend the area of visible built development further south and east and would require sensitive boundary landscaping to minimise the visual impact of development. The site forms part of the wider green network under Policy D4.
- It is viewed that Waterfoot Road currently provides a robust boundary to the green belt. It is recognised that the landscape strategy submitted to the MIR proposed enhancing and strengthening the hedgerow to the southern, eastern and northern boundaries. Enhancements to planting along the existing field boundaries and along the burn could also improve bio-diversity and create a visual buffer to the new properties.
- It is accepted that the site is accessible to a range of services and facilities in the local area. A new co-op is under construction to the west of the site which will provide a local shopping facility once operational.
- It was stated that as the Council has permitted development of St Clares and Calderwood Lodge Joint campus then this shows that the Council has accepted the principal of all development to the south of Waterfoot Road. However, this proposal was for a school development to meet a recognised educational need and was

required as a core component of the Maidenhill master plan (Policy M2.1). The Council therefore strongly disagrees with the representees assumption.

- It is accepted that a house builder is now actively involved with the site. The representation also states that the site is effective and deliverable.
- Notwithstanding the above, the site given its location in the Green Belt is not supported by the Proposed Plan. Other more sustainable sites have been identified in the Plan to meet housing needs.
- As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.
- It is recommended that this site continues to be allocated as Green Belt.
- It is not proposed to modify the Plan based upon the above.

**(c) LDP2-03 Burnhouse Farm Parcel 1 and 2 (CS064)**

Persimmon Homes (384/1)

- An objection was received regarding the non-inclusion of the site as a preferred housing site under Policy SG1 and Schedule 15.
- This greenfield site is located in the Green Belt and lies to the southern fringe of Newton Mearns. The site is bounded by Waterfoot Road to the north, Burnhouse Farm and a burn to the east and Mearns Cemetery to the west. An existing hedgerow forms the southern boundary.
- The Landscape Character assessment identifies the landscape sensitivity site as medium, visual sensitivity as medium to high, and overall green belt sensitivity as moderate to strong.
- The site and wider has a rural appearance and makes a positive contribution to the landscape setting of this part of the Green Belt. The site acts as a strong green gateway when travelling along Waterfoot Road in either direction. Development would extend the area of visible built development further south and east and would require sensitive boundary landscaping to minimise the visual impact of development. The site forms part of the wider green network under Policy D4.
- It is viewed that Waterfoot Road currently provides a robust boundary to the green belt. It is recognised that the landscape strategy submitted to the MIR proposed enhancing and strengthening the hedgerow to the southern and northern boundaries. Enhancements to planting along the existing field boundaries and along the burn could also improve bio-diversity and create a visual buffer to the new properties.
- It is accepted that the site is accessible to a range of services and facilities in the local area. A new co-op is under construction to the west of the site which will provide a local shopping facility once operational.
- It was stated that as the Council has permitted development of St Clares and Calderwood Lodge Joint campus then this shows that the Council has accepted the principal of all development to the south of Waterfoot Road. However, this proposal was for a school development to meet a recognised educational need and was required as a core component of the Maidenhill master plan (Policy M2.1). The Council therefore strongly disagrees with the representees assumption.
- It is accepted that a house builder is now actively involved with the site. The representation also states that the site is effective and deliverable.
- Notwithstanding the above, the site given its location in the Green Belt is not supported by the Proposed Plan. Other more sustainable sites have been identified in the Plan to meet housing needs.

- As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.
- It is recommended that this site continues to be allocated as Green Belt.
- It is not proposed to modify the Plan based upon the above.

**(d) LDP2-05 Broomburn Drive, Newton Mearns (CS029 / MIR4)**

Mactaggert & Mickel (457/1)

- An objection was received regarding the non-inclusion of the site as a preferred housing site under Policy SG1 and Schedule 15.
- This Greenfield site is currently designated as protected urban greenspace under Policy D5. The site also falls within a Tree Preservation Order (TPO) area and LBS. The site is located in an established residential area. A Neighbourhood Centre is located directly adjacent to the north of the site. The site is well maintained open space and also comprises a children's play area. Mearns Castle High School is located to the south of the site.
- The site was identified as a preferred housing site under Option 2A of the MIR (CD/@@) (MIR4). However, as explained under Issue 2 and Issue 13 analysis of education, demographic and housing data showed that further housing releases would have major impacts upon the existing education infrastructure. In addition there was a significant volume of objection to the proposal at MIR stage. As such the proposal was not carried forward to the Proposed Plan.
- The site performs a strong recreational role. The site forms part of the wider green network under Policy D4. Development may adversely impact upon the character and amenity of this area of open space and surrounding area and would require sensitive boundary landscaping to minimise the visual impact.
- It is acknowledged that the proposal aims to provide 50% of the residential units as affordable and also provide further commercial retail opportunities. Upgrades to the open space and play provision are also proposed.
- Part of the site is subject to flood risk and a flood risk assessment would be required to demonstrate the developable area.
- A Transport Assessment would be required to determine the potential traffic impact from the neighbourhood centre and identify an access solution.
- The Council acknowledges that a proposal for a Health Centre was included in the adopted LDP1 (CD/@@) and in previous Local Plans. However, this proposal has been removed from the Proposed Plan due to a lack of interest.
- The site given its protection as Urban Greenspace is therefore not supported by the Proposed Plan. Other more sustainable sites have been identified in the Plan to meet housing needs.
- The Proposed Plan promotes a compact strategy of consolidation and regeneration of the urban areas alongside a focus on protecting green spaces. The Proposed Plan seeks to protect, enhance and increase the amount and quality of greenspaces. This is clearly evidenced in Spatial Objective 1.4, Strategic Policy 1 and Policy D5. Development of this site would clearly be contrary to this key objective and the strategy of the Proposed Plan.
- As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.
- It is recommended that this site continues to be allocated as Urban Greenspace under Policy D5.
- It is not proposed to modify the Plan based upon the above.



**(e) LDP2-09 Barcapel, Newton Mearns (CS013)****Mactaggert & Mickel (462/1) (462/2)**

- An objection was received regarding the non-inclusion of the site as a preferred housing site under Policy SG1 and Schedule 15.
- This large greenfield site is located in the Green Belt and lies to the eastern fringe of Newton Mearns. The site comprises undulating farmland with hedgerows and a significant number of mature trees. It is bounded by the Capelrig Drive with Whitecraigs Golf Course to the south. The Auldhouse Burn forms part of the southern boundary.
- The Landscape Character assessment identifies the landscape sensitivity as medium, visual sensitivity as medium to high, and overall green belt sensitivity as moderate.
- The site and wider makes a positive contribution to the landscape setting of this part of the Green Belt. Development would extend the area of built development further east and would require sensitive boundary landscaping to minimise the visual impact of development. The site forms part of the wider green network under Policy D4.
- The site lies to the east of the recently completed Persimmon development.
- It is recognised that this proposal is also linked to a wider proposal for the reconfiguration of Whitecraigs Golf course. This is addressed under site ref LDP2-29 and estimates 37 units on the northern part of the site only.
- No details of landscape proposals were submitted with this representation so it is unclear how the impact upon the green belt and landscape would be addressed.
- It is accepted that a house builder is now actively involved with the site. The representation also states that the site is effective and deliverable.
- Notwithstanding the above, the site given its location in the Green Belt is not supported by the Proposed Plan. Other more sustainable sites have been identified in the Plan to meet housing needs.
- As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.
- It is recommended that this site continues to be allocated as Green Belt.
- It is not proposed to modify the Plan based upon the above.

**(f) LDP2-14 Land at Humbie Road (SMIR06)****Mr William Clifford (470/1)**

- An objection was received regarding the non-inclusion of the site as a preferred housing site under Policy SG1 and Schedule 15.
- This large greenfield site is located in the Green Belt and lies to the south of Newton Mearns. The site comprises agricultural land and slopes steeply from the existing farm buildings in a northerly direction towards the earn water. The site is bounded by Humbie Road to the north-east with farmland to the south-east. Earn Water runs along the north-western and south-western boundaries. The site is entirely detached from the main urban area of Newton Means.
- The Landscape Character assessment identifies the landscape sensitivity of the site as medium, visual sensitivity as medium to high, and overall green belt sensitivity as moderate to strong.

- The site and wider area make a positive contribution to the landscape setting of this part of the Green Belt and act as a strong green gateway into/out of Newton Mearns. Development would be detached from the main urban areas and would require sensitive boundary landscaping to minimise the visual impact of development. The sloping topography of the site would enhance the visibility of any development. The site forms part of the wider green network under Policy D4.
- No details of landscape proposals were submitted with this representation so it is unclear how the impact upon the green belt and landscape would be addressed. Even with the submission of landscape proposals the development would be highly visible until these landscape features had matured. In addition, development would be at the expense of a major incursion into a very visible section of the green belt and would undermine the open and rural setting of this area.
- The site is clearly outside and not well related to the built form of Newton Mearns resulting in an isolated development.
- The effectiveness and deliverability of the site has not been demonstrated and the Council is not aware of any active house builder interest in the site.
- The site given its location in the Green Belt is not supported by the Proposed Plan. Other more sustainable sites have been identified in the Plan to meet housing needs.
- As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.
- It is recommended that this site continues to be allocated as Green Belt.
- It is not proposed to modify the Plan based upon the above.

**(g) LDP2-15 Ryatt, Newton Mearns (CS035)**

Homeground Ltd (477/1)

- An objection was received regarding the non-inclusion of the site as a preferred housing site under Policy SG1 and Schedule 15.
- This large green field site is located in the Green Belt to the west of the M77 and forms part of a green corridor separating Newton Mearns from Barrhead. The site consists of agricultural land and is bounded by the railwayline to the north, M77 to the east, Ryatt Linn reservoir and Ayr Road to the west and West Lodge Woods to the South.
- The Landscape Character assessment identifies the landscape sensitivity as medium to high, visual sensitivity as low to medium, and overall green belt sensitivity as moderate to strong. The Green Belt boundary follows the line of M77 and is considered to be especially well defined and strong. The M77 effectively acts as an urban break between Newton Mearns and this site.
- The site and wider makes a positive contribution to the landscape setting of this part of the Green Belt. Development would extend the area of visible built development further west and would require sensitive boundary landscaping to minimise the visual impact of development. The site forms part of the wider green network under Policy D4.
- Development would remove a significant green wedge, significantly narrowing the green corridor between Newton Mearns and Barrhead and would impact upon landscape character. Development would reduce the current rural quality and feel of the area. The release of this site may also expose a wider area of Green Belt to further development pressure.

- No details of landscape proposals were submitted with this representation so it is unclear how the impact upon the green belt and landscape would be addressed. Even with the submission of landscape proposals the development would be highly visible until these landscape features had matured. In addition, development would be at the expense of a major incursion into a very visible section of the green belt and would undermine the open and rural setting of this area and encroach into the heart of the Dams to Darnley Country Park.
- The site is clearly outside and not well related to the built form of Newton Mearns resulting in an isolated development.
- It is acknowledged that the proposal refers to the potential for a mixed use development. However, no further information is provided on this point as to what is envisaged or the scale of use.
- It was stated that development would allow the Council to implement improvements to Junction 4. However, at the Local Plan Examination in 2010 (CD/@@) Transport Scotland were clear they would only support development of national significance here to allow for upgrading of the junction. The previous link road to Barrhead from Junction 4 that cut across the Country Park was not included in the adopted LDP1 with other upgrades to the road network promoted. Policy Strat 3.2 relates to potential longer term access and Policy Strat 3.1 relates to upgrades to Aurs Road. The Action Programme provides further details on the timescale and progress with these projects.
- The proposed sites lie within the Dams to Darnley Country Park. One of the main reasons the area was identified as an access, leisure, recreational and environmental project was because of the potential the landscape offered for these uses and as a means of protecting this important Green Belt wedge separating Newton Mearns, Barrhead and Darnley. Enhancement of the Country Park through improving access, tourism activity and encouraging appropriate commercial and leisure activity remain key Council aspirations and are key city deal projects under Strategic Policy 3. Connectivity and Country Park enhancements are addressed within the Dams to Darnley SPG (CD/@@). The scale of development proposed by these representations would undermine these proposals and the Development Strategy of the Plan.
- It was stated that the principle of developing this land has already been accepted in previously adopted local plans. This reference related to a former allocation for a High Amenity Site. There is no longer a requirement in SPP for Councils to safeguard large single user amenity sites for inward investment and no allocation for such a use was identified in LDP1. There is no policy support for development at this location.
- It was stated that as the Council has permitted development for a retirement village at the Netherplace works site then this shows that the Council has accepted the principle of development to the west of the M77. However, this proposal is for a particular use only, private mainstream housing would not be supported at this location. The Council therefore strongly disagrees with the representees assumption.
- The Council disagrees that the site is a highly accessible location.
- The effectiveness and deliverability of the site has not been demonstrated and the Council is not aware of any active house builder interest in the site.
- The site given its location in the Green Belt is not supported by the Proposed Plan. Other more sustainable sites have been identified in the Plan to meet housing needs.
- As there is no requirement to release additional sites the site has been rejected for inclusion as a housing or mixed use proposal.

- It is recommended that this site continues to be allocated as Green Belt.
- It is not proposed to modify the Plan based upon the above.

**(h) LDP2-16 Pilmuir Quarry (CS045)**

Highloch Ltd (478/1)

- An objection was received regarding the non-inclusion of the site as a preferred housing site under Policy SG1 and Schedule 15 as a Brownfield Redevelopment Opportunity. The representation proposes enabling residential led, mixed-use development, including leisure uses, to cross fund security, maintenance and environmental improvements to the site.
- This large brownfield site is located in the Green Belt to the west of the M77. The site is a former quarry. Pilmuir Road provides access to the site and splits the site into 2 parcels, the quarry to the south and land formerly used for quarry buildings to the north. The perimeter of the site comprises by tree belts and other vegetation.
- The Landscape Character assessment identifies the landscape sensitivity as low to medium, visual sensitivity as low to medium, and overall green belt sensitivity as weak to moderate.
- The Green Belt boundary follows the line of M77 and is considered to be especially well defined and strong. The M77 effectively acts as an urban break between Newton Mearns and this site. Development would extend the area of visible built development further west. The site forms part of the wider green network under Policy D4. It is acknowledged that additional planting is proposed to enhance the local natural environment.
- The site is clearly outside and not well related to the built form of Newton Mearns.
- The development of Brownfield sites is a Council priority; however, sites must be in sustainable locations and in accordance with the Development strategy. The site is also not included in the Councils Vacant and Derelict Land Assessment.
- The effectiveness and deliverability of the site has not been demonstrated and the Council is not aware of any active house builder interest in the site.
- A leisure proposal would be more in keeping with the objectives of the green belt policy at this location although justification would need to be provided that demonstrated whether this would be viable with/without an element of enabling residential development. The Council has not seen any evidence to support this position.
- The site given its location in the Green Belt is not supported by the Proposed Plan. Other more sustainable sites have been identified in the Plan to meet housing and mixed use needs.
- As there is no requirement to release additional sites the site has been rejected for inclusion as a housing or mixed use proposal.
- It is recommended that this site continues to be allocated as Green Belt.
- It is not proposed to modify the Plan based upon the above.

**(i) LDP2-17 Barrance Farm Newton Mearns (CS007 & CS008/MIR01)**

Stewart Milne Homes Ltd (487/1)

- An objection was received regarding the non-inclusion of the site as a preferred housing site under Policy SG1 and Schedule 15.

- The two sites are located in the Green Belt and lie to the south eastern edge of Newton Mearns. The sites comprise agricultural land.
- CS007 is an undulating grassed field bounded to the west by an established residential estate, Mearns Castle Golf Academy to the south with a right of way/track running along the eastern boundary. A hedgerow also forms the eastern and northern boundaries and separates the sites from other agricultural fields beyond.
- CS008 is a triangular shaped parcel of land bounded by Waterfoot Road to the South, Kirkhill Road and Mearns Castle Golf Academy to the east and to the North West, the former Barrance Farm steading now developed to the north east corner and to the north a tree belt and farm access track. The Mactaggert and Mikel development at Castle Grove which is well advanced lies to the west.
- Site CS008 was identified as a preferred housing site under Option 2A of the MIR (CD/@@) (MIR1). Site CS007 was not a preferred MIR housing site. However, as explained under Issue 2 and Issue 13 analysis of education, demographic and housing data showed that further housing releases would have major impacts upon the existing education infrastructure. As such the proposal was not carried forward to the Proposed Plan.
- The site falls within 2 landscape areas. The Landscape Character assessment identifies the landscape sensitivity of site CS008 as medium, visual sensitivity as medium to high, and overall green belt sensitivity as moderate to strong. The Landscape Character assessment identifies the landscape sensitivity of site CS007 as medium, visual sensitivity as medium, and overall green belt sensitivity as moderate to strong.
- The sites and wider area have a rural appearance and make a positive contribution to the landscape setting of this part of the Green Belt. Development would extend the area of visible built development further south and east and would require sensitive boundary landscaping to minimise the visual impact of development. The sites form part of the wider green network under Policy D4.
- Site CS008 is visible when travelling along Waterfoot Road and also from the wider landscape to the south. Site CS007 is less visible from the surrounding areas. However, site CS007 forms part of a green corridor separating Newton Mearns and Clarkston. Development would reduce this gap.
- It is recognised that Waterfoot Road and Kirkhill Road provide well defined boundaries for site CS008. In addition the development at Castle Grove has altered the landscape character. The current green belt boundary for site CS008 is formed by trees and the back gardens off Laigh Road. It is recognised that landscape proposals could create a stronger green belt boundary by providing planting to the eastern and northern boundaries. It is also recognised that strengthening and enhancing existing planting could also improve bio-diversity. However, site CS008 would remain visible until these landscape features had matured.
- It is accepted that a house builder is now actively involved with the site. The representation also states that the site is effective and deliverable.
- Notwithstanding the above, the site given its location in the Green Belt is not supported by the Proposed Plan. Other more sustainable sites have been identified in the Plan to meet housing needs.
- As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.
- It is recommended that this site continues to be allocated as Green Belt.
- It is not proposed to modify the Plan based upon the above.

**(j) LDP2-23 Mearns Kirk Glebe (SMIR03)****Church of Scotland General Trustees (499/1) (499/3)**

- An objection was received regarding the non-inclusion of the site as a preferred housing site under Policy SG1 and Schedule 15.
- This is a Greenfield site and is currently designated as protected urban greenspace under Policy D5. The site is located to the west of Eaglesham Road. Mearns Kirk is a B Listed Church.
- The Council recognises the proposal is largely located on the footprint of the existing manse and associated garden ground/open space. The proposal is for 8 mainstream family sized homes.
- The Council accepts that there is little public use of the site at present but contends that any future proposal on this site should satisfy the requirements of policy D5 and demonstrate no loss of biodiversity or landscape function and provide an appropriate level of mitigation. The Council agrees with the representee that the open space provides the landscape setting to the B Listed Kirk building.
- The objection states that the proposed development will improve views of the Kirk and enhance the setting of the listed building but does not provide evidence on how this will be achieved or what mitigation measures will be put in place in line with Policy D5. It is viewed that the proposal will dominate and detract from the listed building and will significantly and adversely impact on its setting.
- Gaining a suitable and safe access from Eaglesham Road has not been fully demonstrated.
- The effectiveness and deliverability of the site have not been fully demonstrated and the Council is not aware of any active house builder interest in the site.
- The site given its protection as Urban Greenspace is therefore not supported by the Proposed Plan. Other more sustainable sites have been identified in the Plan to meet housing needs.
- The Proposed Plan promotes a compact strategy of consolidation and regeneration of the urban areas alongside a focus on protecting green spaces. The Proposed Plan seeks to protect, enhance and increase the amount and quality of greenspaces. This is clearly evidenced in Spatial Objective 1.4, Strategic Policy 1 and Policy D5. Development of this site would clearly be contrary to this key objective and the strategy of the Proposed Plan.
- As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.
- It is recommended that this site continues to be allocated as Urban Greenspace under Policy D5.
- It is not proposed to modify the Plan based upon the above.

**(k) LDP2-27 Humble Road, Newton Mearns (CS046)****Robertson Homes (506/1) (506/2) (506/3)**

- An objection was received regarding the non-inclusion of the site as a preferred housing site under Policy SG1 and Schedule 15.
- This large greenfield site is located in the Green Belt and lies to the southern fringe of Newton Mearns. The site is bounded by Humble Road to the south, to the east

by a hedgerow and treebelt, cemetery and Waterfoot Road to the north and an existing residential estate to the west.

- The Landscape Character assessment identifies the landscape sensitivity site as medium, visual sensitivity as medium to high, and overall green belt sensitivity as moderate to strong.
- The site and wider has a rural appearance and makes a positive contribution to the landscape setting of this part of the Green Belt. The site acts as a strong green gateway into/out of Newton Mearns. Development would extend the area of visible built development further south and would require sensitive boundary landscaping to minimise the visual impact of development. The site forms part of the wider green network under Policy D4.
- It is viewed that Humbie Road currently provides a robust boundary to the green belt. It is recognised that landscape proposals could create a strong green belt boundary by strengthening and enhancing existing boundary planting to the south eastern and north eastern boundaries. Enhancements to planting along the existing field boundaries could also improve bio-diversity.
- It is accepted that the site is accessible to a range of services and facilities in the local area. A new co-op is under construction which will provide a local shopping facility to serve the site once operational.
- It is accepted that a house builder is now actively involved with the site. The representation also states that the site is effective and deliverable.
- Notwithstanding the above, the site given its location in the Green Belt is not supported by the Proposed Plan. Other more sustainable sites have been identified in the Plan to meet housing needs.
- As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.
- It is recommended that this site continues to be allocated as Green Belt.
- It is not proposed to modify the Plan based upon the above.

#### **(I) LDP2-29 Whitecraigs Golf Course (CS017 + new areas)**

##### Mactaggart & Mickel (509/1)

- An objection was received regarding the non-inclusion of the sites as preferred housing sites under Policy SG1 and Schedule 15.
- The proposal is for a series of golf course improvements at Whitecraigs Golf Course and associated enabling residential development. The entire site falls within the Green Belt and forms part of the wider green network under Policy D4. The site lies within the residential area of Whitecraigs.
- Four residential sites promoted within masterplan.
  - Site A lies to the north eastern corner of the site and is bounded by the railwayline, Ayr Road, Whitecraigs Court and a LBS to the west. Part of the existing car park falls within the site boundary with mature trees separating the site from the adjacent properties;
  - Site B is bounded by Ayr Road and a line of conifers, residential properties off Netherton Road with golf course land to the north and east;
  - Site C (previous Council ref. CS017 and CS038) is bounded by Ayr Road and existing residential areas with golf course land to the north. The site falls within a TPO area with a number of mature trees separating the site from the adjacent properties.
  - Site D (previous (Council ref. CS013). Addressed further under ref (LDP2-09).

- The Council acknowledges the merits in the proposal to secure improvements to the golf course and the clubs longer term future. Sites A-C are located adjacent to the Whitecraigs Conservation area and proposals would have to be sensitively designed to ensure they do not adversely impact on the setting of the Conservation area.
- It is accepted that a house builder is now actively involved with the site. The representation also states that the site is effective and deliverable.
- Notwithstanding the above, the site given its location in the Green Belt is not supported by the Proposed Plan. Other more sustainable sites have been identified in the Plan to meet housing needs.
- As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.
- It is recommended that this site continues to be allocated as Green Belt.
- It is not proposed to modify the Plan based upon the above.

**Reporter's conclusions:****Reporter's recommendations:**



<b>Issue 25</b>	Submitted Housing Supply Neilston	
<b>Development plan reference:</b>	Policy SG1: Housing Supply, Delivery and Phasing Schedule 15: Housing Sites	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
Lynch Homes (505/1) (505/2) (505/3) Barratt Homes West (511/1) (511/2)		
<b>Provision of the development plan to which the issue relates:</b>	Chapter 4: Promoting Sustainable and Inclusive Economic Growth Alternative Housing Development Proposals: <ul style="list-style-type: none"> <li>• LDP2-26 Uplawmoor Road, Neilston (CS048)</li> <li>• LDP2-31 Nether Kirkton Farm, Neilston (CS010)</li> </ul> Supporting Documents: <ul style="list-style-type: none"> <li>• Site Evaluation</li> <li>• Strategic Environmental Assessment</li> </ul>	
<b>Planning authority's summary of the representation(s):</b>		
<p><b><u>(a) LDP2-26 Uplawmoor Road, Neilston (CS048)</u></b></p> <p><u>Lynch Homes (505/1) (505/2) (505/3)</u></p> <ul style="list-style-type: none"> <li>• Objects to the non-allocation of land at Uplawmoor Road, Neilston (CS048) for residential development of 80 homes.</li> <li>• Should it be determined that there is a requirement to allocate additional housing sites to ensure that an effective housing land supply is provided, the site at Uplawmoor Road, Neilston is an appropriate site for residential development.</li> <li>• The site is effective and represents a sustainable development, meeting the requirements of Scottish Planning Policy and Clydeplan Strategic Development Plan. The proposal can make a valuable contribution to the effective housing land supply during the period of the Proposed LDP 2 as well as any future development strategy.</li> <li>• Representee submitted a development framework in support of their proposal.</li> <li>• The site is in a sustainable location with an easy walk to bus services as well as local services and amenities.</li> <li>• Query the site evaluation and SEA evaluation and scoring of sites. State that the site should have been scored more positively for Q2 (Site Location), Q3 (Impact of Development), Q5 (Natural Heritage), Q7 (Accessibility to Services/Facilities), Q9 (Constraints).</li> <li>• The updated SEA Assessment also demonstrates that the proposal will have an overall positive impact on the environment.</li> </ul>		

**(b) LDP2-31 Nether Kirkton Farm, Neilston (CS010)**Barratt Homes West (511/1) (511/2)

- Objects to the non-allocation of land at Nether Kirkton Farm, Neilston (CS010) for residential development of 120 units including 25% affordable.
- The site is effective, is well contained and has no adverse landscape impacts.
- Site is a logical "rounding off " of the settlement.
- Development well advanced at Taylor Wimpey site (SG1.19) which effectively extends the boundary of Neilston village.
- The boundaries of the proposed site also differ from those identified in the MIR.
- There is existing capacity in all 4 schools serving Neilston, which would allow for more housing.
- Representee submitted a Development Framework including a Transport and Access Appraisal Report in support of their proposal.
- The site appraisal for (CS010) gave a relatively high score of 15. Are of the opinion that the accessibility to services score should be increased from 1 to 3. And the constraints score increased from 1 to 3.

**Modifications sought by those submitting representations:**(a) LDP2-26 Uplawmoor Road, Neilston (CS048)Lynch Homes (505/1)

- Inclusion of the site within Schedule 15 of the Proposed LDP2 for residential development and identification on the associated Proposals Map.
- Removal from the Green Belt.

(b) LDP2-31 Nether Kirkton Farm, Neilston (CS010)Barratt Homes West (511/1)

- Inclusion of the site within Schedule 15 of the Proposed LDP2 for residential development and identification on the associated Proposals Map.
- Removal from the Green Belt.

**Summary of responses (including reasons) by planning authority:****OVERVIEW**

- Justification for the Development Strategy of the Plan is demonstrated under Issue 2 (Development Strategy). The Council's approach to housing supply is addressed under Issue 14 (Housing Supply, Delivery and Phasing) and Education Infrastructure under Issue 13 (Community and Education Facilities and Infrastructure). Under these issues it is clearly demonstrated that the Plan is providing an effective generous land supply in to meet the requirements of Scottish Planning Policy (SPP) (CD/@@) and Clydeplan (2017) (CD/@@) and that Education Infrastructure remains a significant constraint to further development being supported in the Proposed Plan. These issues conclude that further housing releases would have major impacts upon the existing education infrastructure across all sectors and both the Leven Valley and Eastwood areas.

### **Site Evaluation and Strategic Environmental Assessment**

- Representations for site (a) objected to the scoring and findings of the Site Evaluation (CD/@@) and Strategic Environmental Assessment (CD/@@).
- The site evaluation study was prepared to assist with the identification of sites to be included in the Proposed Plan. The assessment methodology along with the SEA, together provide a consistent, robust and objective framework for the assessment of land use proposals. The site evaluation methodology is thorough and robust and provides a fair and consistent method of ranking and comparing alternative sites.
- The SEA clearly identifies environmental effects on policies and proposals and potential mitigation measures. Comments from the SEA gateway and other organisations will inform the next stage of the SEA process as referred to further under Issue 1.
- This approach has been applied consistently across all sites and has been agreed as an accepted methodology by Reporters at previous LDP examinations. The Council stands by the outcomes of these exercises.
- It is not proposed to modify the Plan based on the above.

#### **(a) LDP2-26 Uplawmoor Road, Neilston (CS048)**

##### Lynch Homes (505/1) (505/2) (505/3)

- An objection was received regarding the non-inclusion of the site as a preferred housing site under Policy SG1 and Schedule 15.
- This large green field is located in the Green Belt and lies to the western fringe of Neilston. The site is bounded by residential properties to the east, Uplawmoor Road to the South and other farmland and Levern Water to the North and west. The site is divided into 2 field parcels by a private access road. A Local Biodiversity Site (LBS) designation covers the entire site.
- The Landscape Character assessment (CD/@@) identifies the landscape sensitivity as medium, visual sensitivity as low to medium, and overall green belt sensitivity as moderate to strong.
- The site acts as a strong green gateway into/out of Neilston when approaching along Uplawmoor Road. The site has an important influence on the settlement character. Development would reduce the current rural quality and feel of the area although residential development on the southern side of Uplawmoor Road has already contributed to this. Development would extend the area of visible built development further west and would require sensitive boundary landscaping to minimise the visual impact of development. The site forms part of the wider green network under Policy D4.
- The Council recognises the merits in the eastern field closest to the urban edge. This would have a better landscape fit than the western field and its release would not unduly impact upon the role and function of the Green Belt.
- A previous planning application (2011/0824/TP) (CD/@@) was refused by the Council and on appeal (PPA-220-2022) (CD/@@) on 4th April 2013.
- Strategic Policy 1 states that development in the rural settlements will be limited to 'infill' development compatible with the character, amenity and settlement pattern. The size of the proposed development is far greater than the size of a development that could be described as 'infill'.
- It is accepted that a house builder is now actively involved with the site. The representation also states that the site is effective and deliverable.

- It is accepted the site is accessible to both bus and rail infrastructure.
- The site given its location in the Green Belt is not supported by the Proposed Plan. Other more sustainable sites have been identified in the Plan to meet housing needs.
- As there is no requirement to release additional sites and as the site is covered by a LBS designation the site has been rejected for inclusion as a housing proposal.
- It is recommended that this site continues to be allocated as Green Belt.
- It is not proposed to modify the Plan based upon the above.

**(b) LDP2-31 Nether Kirkton Farm, Neilston (CS010)**

Barratt Homes West (511/1) (511/2)

- An objection was received regarding the non-inclusion of the site as a preferred housing site under Policy SG1 and Schedule 15.
- This large green field is located in the Green Belt and lies to the western fringe of Neilston. The site is bounded by Neilston Road to the north, an existing residential estate to the west, Kirkton Road and Springfield Road to the south and east with open fields beyond.
- The Landscape Character assessment identifies the landscape sensitivity as low to medium, visual sensitivity as medium to high, and overall green belt sensitivity as moderate to strong.
- The site acts as a strong green gateway into/out of the area and has an important influence on the settlement character. The land is prominent, rising up from Neilston Road, especially when approaching from Barrhead to the east. Development would reduce the current rural quality and feel of the area although it is accepted that the Taylor Wimpey development (SG1.19) (Proposed Plan ref) which is currently under construction has altered the landscape character on the approach to the village.
- Development would extend the area of visible built development further north and east and would require sensitive boundary landscaping to minimise the visual impact of development. The site and wider area provides bio-diversity and green network value.
- It is recognised that mitigation planting could assist with strengthening and enhancing the landscape character, protect settlement separation and improve the urban edge.
- Strategic Policy 1 states that development in the rural settlements will be limited to 'infill' development compatible with the character, amenity and settlement pattern. The size of the proposed development is far greater than the size of a development that could be described as 'infill'.
- It is accepted that a house builder is now actively involved with the site. The representation also states that the site is effective and deliverable.
- It is accepted the site is accessible to both bus and rail infrastructure.
- Notwithstanding the above, the site given its location in the Green Belt is not supported by the Proposed Plan. Other more sustainable sites have been identified in the Plan to meet housing needs.
- As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.
- It is recommended that this site continues to be allocated as Green Belt.
- It is not proposed to modify the Plan based upon the above.

<b>Reporter's conclusions:</b>
<b>Reporter's recommendations:</b>

<b>Issue 26</b>	Submitted Housing Supply Uplawmoor	
<b>Development plan reference:</b>	Policy SG1: Housing Supply, Delivery and Phasing Schedule 15: Housing Sites	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
Mactaggart & Mickel (507/1) (507/2)		
<b>Provision of the development plan to which the issue relates:</b>	Chapter 4: Promoting Sustainable and Inclusive Economic Growth Alternative Housing Development Proposals: <ul style="list-style-type: none"> <li>• LDP2-28 Uplawmoor West (CS063)</li> </ul> Supporting documents: <ul style="list-style-type: none"> <li>• Site Evaluation</li> </ul>	
<b>Planning authority's summary of the representation(s):</b>		
<p><b><u>(a) LDP2-28 Uplawmoor West (CS063)</u></b></p> <p><u>Mactaggart &amp; Mickel (507/1) (507/2)</u></p> <ul style="list-style-type: none"> <li>• Objects to the non-allocation of land at Uplawmoor West (CS063) for residential development.</li> <li>• As an area of private land with no established public right of access the site should not be covered by a policy that seeks to protect public open space from development.</li> <li>• Low density development would not have any adverse impact on nature conservation of the wider green network. Propose green link through site to adjoining Pollick Glen. There would be no loss of recreational space and impact on Pollick Glen.</li> <li>• Small infill site which could contribute positively to the village.</li> <li>• The site is effective.</li> <li>• Evaluation for this site should be 18 and not 11 as stated in the site evaluation.</li> <li>• Representee submitted a Development Framework in support of their proposal.</li> <li>• There are no significant education capacity constraints in the Levern Valley sub-area within East Renfrewshire in any sector. No Education constraint affecting Uplawmoor.</li> </ul>		
<b>Modifications sought by those submitting representations:</b>		
<p><b><u>(a) LDP2-28 Uplawmoor West (CS063)</u></b></p> <p><u>Mactaggart &amp; Mickel (507/1) (507/2)</u></p> <ul style="list-style-type: none"> <li>• Inclusion of the site within Schedule 15 of the Proposed LDP2 for residential development and identification on the associated Proposals Map.</li> <li>• Removal of Policy D5: Open Space designation.</li> </ul>		

## Summary of responses (including reasons) by planning authority:

### OVERVIEW

- Justification for the Development Strategy of the Plan is demonstrated under Issue 2 (Development Strategy). The Council's approach to housing supply is addressed under Issue 14 (Housing Supply, Delivery and Phasing) and Education Infrastructure under Issue 13 (Community and Education Facilities and Infrastructure). Under these issues it is clearly demonstrated that the Plan is providing an effective generous land supply in to meet the requirements of Scottish Planning Policy (SPP) (CD/@@) and Clydeplan (2017) (CD/@@) and that Education Infrastructure remains a significant constraint to further development being supported in the Proposed Plan. These issues conclude that further housing releases would have major impacts upon the existing education infrastructure across all sectors and both the Leven Valley and Eastwood areas.

### Site Evaluation

- Representations for site (a) objected to the scoring and findings of the Site Evaluation (CD/@@).
- The site evaluation study was prepared to assist with the identification of sites to be included in the Proposed Plan. The assessment methodology along with the SEA, together provide a consistent, robust and objective framework for the assessment of land use proposals. The site evaluation methodology is thorough and robust and provides a fair and consistent method of ranking and comparing alternative sites.
- This approach has been applied consistently across all sites and has been agreed as an accepted methodology by Reporters at previous LDP examinations. The Council stands by the outcomes of these exercises.
- It is not proposed to modify the Plan based on the above.

### (a) LDP2-28 Uplawmoor West (CS063)

#### Mactaggart & Mickel (507/1) (507/2)

- An objection was received regarding the non-inclusion of the site as a preferred housing site under Policy SG1 and Schedule 15.
- This is a Greenfield site within the village and is currently designated as protected urban greenspace under Policy D5. The site is also covered by a Tree Preservation Order (TPO) area. The area is located between the residential properties on Neilston/Tannoch Road, and the recreational route and Local Biodiversity Site along Pollick glen. The site is overgrown with areas of shrubs, hedges, trees and grasses.
- The TPO provides important environmental protection for the trees. The site also forms part of the green network within the area and offers bio-diversity value. The site performs a strong recreational role with an informal network of paths running through the site towards the core path, woodland and burn along Pollick Glen. The site provides a positive contribution to the green network within Uplawmoor.
- Development may adversely impact upon the character and amenity of this area of open space and surrounding area and would require sensitive boundary landscaping to minimise the visual impact.

- It is recognised that landscape proposals could protect existing key trees, enhance biodiversity through additional planting and help integrate the development into the village setting.
- A previous planning application (2003/0683/TP) was refused and the decision upheld through appeal (PPA/220/75) (CD/@@).
- The site given its protection as Urban Greenspace is therefore not supported by the Proposed Plan. Other more sustainable sites have been identified in the Plan to meet housing needs.
- The Proposed Plan promotes a compact strategy of consolidation and regeneration of the urban areas alongside a focus on protecting green spaces. The Proposed Plan seeks to protect, enhance and increase the amount and quality of greenspaces. This is clearly evidenced in Spatial Objective 1.4, Strategic Policy 1 and Policy D5. Development of this site would clearly be contrary to this key objective and the strategy of the Proposed Plan.
- As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.
- It is recommended that this site continues to be allocated as Urban Greenspace under Policy D5.
- It is not proposed to modify the Plan based upon the above.

**Reporter's conclusions:****Reporter's recommendations:**



<b>Issue 27</b>	Submitted Housing Supply Waterfoot	
<b>Development plan reference:</b>	Policy SG1: Housing Supply, Delivery and Phasing Schedule 15: Housing Sites	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
Wallace Land Investments (489/1) (489/2) (489/3) Robertson Homes (510/1) (510/2) Gladman Developments Ltd (571/1) (571/2)		
<b>Provision of the development plan to which the issue relates:</b>	Chapter 4: Promoting Sustainable and Inclusive Economic Growth Alternative Housing Development Proposals: <ul style="list-style-type: none"> <li>• LDP2-19 Floors Farm, Waterfoot (CS049)</li> <li>• LDP2-30 Glasgow Road (south-west), Waterfoot (CS062)</li> <li>• LDP2-32 Glasgow Road, Waterfoot (CS039)</li> </ul> Supporting documents: <ul style="list-style-type: none"> <li>• Site Evaluation</li> <li>• Strategic Environmental Assessment</li> </ul>	
<b>Planning authority's summary of the representation(s):</b>		
<p><b><u>(a) LDP2-19 Floors Farm, Waterfoot (CS049)</u></b></p> <p><u>Wallace Land Investments (489/1) (489/2) (489/3)</u></p> <ul style="list-style-type: none"> <li>• Objects to the non-allocation of land at Floors Farm, Waterfoot (CS049) for residential development of 1340 homes.</li> <li>• Proposal will create a new village, improved public transport, and a new primary school.</li> <li>• Objection that the Proposed LDP2 does not include any new housing sites based upon justification that there is insufficient education capacity to support additional residential allocations.</li> <li>• Should it be determined that there is a requirement to allocate additional housing sites to ensure that an effective housing land supply is provided, the site at Floors Farm, Newton Mearns is an appropriate site for residential development.</li> <li>• Representee submitted a development framework in support of their proposal.</li> <li>• Development of the site will also provide the Council with an opportunity to alleviate school capacity pressures in the wider area, through the provision of a 4ha (10 acre) site for a new primary school/community hub. This will help alleviate existing pressures and unlock further housing allocations as part of the Proposed LDP 2 and any future development strategy.</li> <li>• The site is effective and represents a sustainable development in a sustainable location, meeting the requirements of Scottish Planning Policy and Clydeplan Strategic Development Plan. The proposal can make a valuable contribution to the effective housing land supply during the period of the Proposed LDP 2 as well as any future development strategy.</li> <li>• Query the site evaluation and SEA evaluation and scoring of sites. State that the site should have been scored more positively for Q3 (Impact of Development), Q7</li> </ul>		

(Accessibility to Services/Facilities), Q8 (Accessibility to public transport), and Q9 (Constraints).

- The updated SEA Assessment also demonstrates that the proposal will have an overall positive impact on the environment.

**(b) LDP2-30 Glasgow Road (south-west), Waterfoot (CS062)**

Robertson Homes (510/1) (510/2)

- Objects to the non-allocation of land at Glasgow Road (south-west), Waterfoot (CS062) for residential development.
- Incumbent on the Proposed Plan to provide a range & choice of housing development sites.
- Noted that LDP provides sites at Barrhead, Clarkston, Neilston, Newton Mearns & Uplawmoor. The only settlement not provided for is Waterfoot. To ensure a suitable range and choice of sites, this site at Waterfoot should be added.
- Waterfoot is an area of proven demand (recent developments in Waterfoot have delivered owner-occupied & affordable housing quickly.) This Waterfoot site could also deliver a similar quality of development.
- Waterfoot site is considered effective when considered against (PAN2/2010).
- The land on the east side of Glasgow Road, Waterfoot was identified a 'Preferred Site' in the MIR. This site has similar characteristics and relationship to the existing settlement to the west Glasgow Road site.
- Query the Site Evaluation. The only matter where the scores for the two sites differ in the Council's Site Evaluation Matrix is under Q2 Site Location. The site has 3 sides that either border the settlement boundary or other strong boundaries, and the Q2 Site Location Evaluation Matrix score should be accordingly revised to (2). That being accepted, the total Matrix score would revise to (15), which is the same as the score given to the Glasgow Road MIR site.
- If development of the Glasgow Road MIR site does come forward, whether sooner or later, that would have the effect of pushing the Waterfoot settlement boundary southwards to the Glasgow Southern Orbital. The West Glasgow Road site extends to a similar point and can form an equivalent and parallel extension to Waterfoot without adverse impact on the existing settlement.
- Representee submitted an Indicative Spatial Masterplan Report in support of their proposal.

**(c) LDP2-32 Glasgow Road, Waterfoot (CS039)**

Gladman Developments Ltd (571/1) (571/2)

- Objects to the non-allocation of land at Glasgow Road, Waterfoot (Ref: CS039) for residential development for 200 homes, including 30% affordable, a neighbourhood centre and land for a Primary School with nursery facilities.
- Representee submitted a Development Framework in support of their proposal.
- Previous planning application (2017/0367/TP) and appeal (PPA-220-2042) confirm that there are no technical constraint to development.
- Appropriate solution to education provision and new housing must be identified within LDP2.
- The proposed site at Glasgow Road, Waterfoot represents a site that is of a sufficient scale and within an appropriate and sustainable location, to deliver a new

primary school. A new primary school at this location would provide sufficient capacity to alleviate existing education pressures within the catchment area.

- Proposal would provide significant open space provision and improvements to strategic cycle corridor and core path network.
- Query the site evaluation and SEA evaluation and scoring of sites. In review of the Council's evaluation of the site, we agree with the majority of their assessment, however, based on the indicative proposals the site should have been scored more positively for Q2 (Site Location) and Q3 (Impact of Development). The Council outline 9 criteria to assess each site against and based on these criteria, has assessed the proposed site at Glasgow Road, Waterfoot as having an overall score of 15. This score is comparable to the 13 site's that were identified as preferred housing allocations at the Main Issues Report (MIR) stage, achieving the same score or better than 5 of the preferred allocations, indicating that it is suitable site for release from the green belt.
- The site is also considered to be meet the tests of effectiveness set out in PAN 2/2010.

#### **Modifications sought by those submitting representations:**

##### (a) LDP2-19 Floors Farm, Waterfoot (CS049)

##### Wallace Land Investments (489/1)

- Inclusion of the site within Schedule 15 of the Proposed LDP2 for residential development and identification on the associated Proposals Map.
- Removal from the Green Belt under Policy D3.

##### (b) LDP2-30 Glasgow Road (south-west), Waterfoot (CS062)

##### Robertson Homes (510/1)

- Inclusion of the site within Schedule 15 of the Proposed LDP2 for residential development and identification on the associated Proposals Map.
- Removal from the Green Belt.

##### (c) LDP2-32 Glasgow Road, Waterfoot (CS039)

##### Gladman Developments Ltd (571/1)

- Inclusion of the site within Schedule 15 of the Proposed LDP2 for residential development and identification on the associated Proposals Map.
- Removal from the Green Belt.

#### **Summary of responses (including reasons) by planning authority:**

##### **OVERVIEW**

- Justification for the Development Strategy of the Plan is demonstrated under Issue 2 (Development Strategy). The Council's approach to housing supply is addressed under Issue 14 (Housing Supply, Delivery and Phasing) and Education Infrastructure under Issue 13 (Community and Education Facilities and Infrastructure). Under these issues it is clearly demonstrated that the Plan is providing an effective generous land supply in to meet the requirements of Scottish Planning Policy (SPP) (CD/@@) and Clydeplan (2017) (CD/@@) and that

Education Infrastructure remains a significant constraint to further development being supported in the Proposed Plan. These issues conclude that further housing releases would have major impacts upon the existing education infrastructure across all sectors and both the Leven Valley and Eastwood areas.

### **Site Evaluation and Strategic Environmental Assessment**

- Representations for sites (a), (b) and (c) objected to the scoring and findings of the Site Evaluation (CD/@@) and Strategic Environmental Assessment (CD/@@).
- The site evaluation study was prepared to assist with the identification of sites to be included in the Proposed Plan. The assessment methodology along with the SEA, together provide a consistent, robust and objective framework for the assessment of land use proposals. The site evaluation methodology is thorough and robust and provides a fair and consistent method of ranking and comparing alternative sites.
- The SEA clearly identifies environmental effects on policies and proposals and potential mitigation measures. Comments from the SEA gateway and other organisations will inform the next stage of the SEA process as referred to further under Issue 1.
- This approach has been applied consistently across all sites and has been agreed as an accepted methodology by Reporters at previous LDP examinations. The Council stands by the outcomes of these exercises.
- It is not proposed to modify the Plan based on the above.

### **(a) LDP2-19 Floors Farm, Waterfoot (CS049)**

#### Wallace Land Investments (489/1) (489/2) (489/3)

- An objection was received regarding the non-inclusion of the site as a preferred housing site under Policy SG1 and Schedule 15. The proposal is for the development of a new village in the Green Belt.
- This large green field site is located in the Green Belt and is detached from the main urban areas. The site is separated by Floors Road. The northern section is bounded by Humbie Road to the west, a burn and field boundaries to the north and west and floors road to the south. The southern section is bounded by Humbie Road and Floors Road with the Brackenrig Burn and field boundaries. A TPO designation covers the southern section.
- The site falls within 2 landscape character areas. The Landscape Character assessment (CD/@@) identifies the landscape sensitivity for the larger northern section as medium, visual sensitivity as medium to high, and overall green belt sensitivity as moderate to strong. The Landscape Character assessment identifies the landscape sensitivity for the southern section as medium to high, visual sensitivity as medium, and overall green belt sensitivity as moderate to strong.
- The site acts as a strong green gateway and is particularly prominent when travelling along Humbie Road. The site contributes to the open and rural setting of this part of the green belt. Development would be detached from the main urban areas and would require sensitive boundary landscaping to minimise the visual impact of development. The sloping topography of the site would enhance the visibility of any development. The site forms part of the wider green network under Policy D4.
- It is recognised that landscape proposals could create a stronger green belt boundary by providing a tree belt along the eastern and north eastern boundary and via other structure planting. Enhancements to the existing landscape features

could improve biodiversity. However, the development would be highly visible until these landscape features had matured. In addition, development would be at the expense of a major incursion into a very visible section of the green belt and would undermine the open and rural setting of this area.

- It is recognised that the proposal includes land for a new primary school and a neighbourhood centre. Education matters are addressed in detail under Issue 13. Furthermore the Council is not aware of a retailer committed to operating the retail elements of the proposal.
- The effectiveness and deliverability of the site has not been fully demonstrated and the Council is not aware of any active house builder interest in the site.
- The site given its isolated location in the Green Belt is therefore not supported by the Proposed Plan. Other more sustainable sites have been identified in the Plan to meet housing needs.
- As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.
- It is recommended that this site continues to be allocated as Green Belt.
- It is not proposed to modify the Plan based upon the above.

**(b) LDP2-30 Glasgow Road (south-west), Waterfoot (CS062)**

Robertson Homes (510/1) (510/2)

- An objection was received regarding the non-inclusion of the site as a preferred housing site under Policy SG1 and Schedule 15.
- This large green field site is located in the Green Belt and lies to the South Western fringe of Waterfoot. The site is bounded to the east by Glasgow Road, the Borland Burn to the south, with open views to the west with a timber fence to the north with a section of woodland beyond. A TPO designation cover the site and the wider area.
- The Landscape Character assessment identifies the landscape sensitivity as medium to high, visual sensitivity as medium, and overall green belt sensitivity as moderate to strong.
- The site acts as a strong green gateway and is particularly prominent to people travelling in/out Waterfoot along Glasgow Road. The site contributes to the open and rural setting of the village. The release of this site may also expose a wider area of Green Belt to the west to development pressure. Development would extend the area of visible built development further west and would require sensitive boundary landscaping to minimise the visual impact of development. The site forms part of the wider green network under Policy D4.
- It is recognised that landscape proposals could create a stronger green belt boundary by providing a tree belt along the western boundary. Enhancements to the existing landscape features could improve biodiversity. However, the development would be highly visible until these landscape features had matured. In addition, development would be at the expense of an incursion into a very visible section of the green belt and would undermine the open and rural setting of Waterfoot.
- Strategic Policy 1 states that development in the rural settlements will be limited to 'infill' development compatible with the character, amenity and settlement pattern. The size of the proposed development is far greater than the size of a development that could be described as 'infill'.

- It is accepted that a house builder is now actively involved with the site. The representation also states that the site is effective and deliverable.
- The site given its location in the Green Belt is therefore not supported by the Proposed Plan. Other more sustainable sites have been identified in the Plan to meet housing needs.
- As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.
- It is recommended that this site continues to be allocated as Green Belt.
- It is not proposed to modify the Plan based upon the above.

**(c) LDP2-32 Glasgow Road, Waterfoot (CS039)**

Gladman Developments Ltd (571/1) (571/2)

- An objection was received regarding the non-inclusion of the site as a preferred housing site under Policy SG1 and Schedule 15.
- This large green field site is located in the Green Belt and lies to the Western fringe of Waterfoot. The site is bounded by an existing residential estate to the North, Glasgow Road to the east with open fields beyond. Linn Products borders the site to the south west. Glasgow Road and Floors Road establish strong Green Belt boundaries.
- The Landscape Character assessment identifies the landscape sensitivity as medium to high, visual sensitivity as medium, and overall green belt sensitivity as moderate to strong.
- The site acts as a strong green gateway and is particularly prominent when travelling in/out Waterfoot along Glasgow Road. The site contributes to the open and rural setting of the village. Development would extend the area of visible built development further west and would require sensitive boundary landscaping to minimise the visual impact of development. The site and wider area provides bio-diversity and green network value. Development would result in a major change to the landscape setting of Waterfoot.
- It is recognised that landscape proposals could create a stronger green belt boundary by providing a tree belt along the western boundary. Enhancements to the existing landscape features could improve biodiversity. However, the development would be highly visible until these landscape features had matured. In addition, development would be at the expense of a major incursion into a very visible section of the green belt and would undermine the open and rural setting of Waterfoot.
- It is recognised that the proposal includes land for a new primary school with nursery provision, a new village green and a neighbourhood centre. Education matters are addressed in detail under Issue 13. Furthermore the Council is not aware of a retailer committed to operating the retail elements of the proposal.
- Strategic Policy 1 states that development in the rural settlements will be limited to 'infill' development compatible with the character, amenity and settlement pattern. The size of the proposed development is far greater than the size of a development that could be described as 'infill'.
- An application from Gladman for residential development (2017/0367/TP) (CD/@@) was appealed against the Council's failure to issue a decision PPA-220-2042. This appeal was refused by Scottish Ministers on 1<sup>st</sup> February 2018 (CD/@@).
- The effectiveness and deliverability of the site has not been fully demonstrated and the Council is not aware of any active house builder interest in the site.

- The site given its location in the Green Belt is therefore not supported by the Proposed Plan. Other more sustainable sites have been identified in the Plan to meet housing needs.
- As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.
- It is recommended that this site continues to be allocated as Green Belt.
- It is not proposed to modify the Plan based upon the above.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue 28</b>	Housing Mix and Affordable Housing	
<b>Development plan reference:</b>	Policy SG2: Housing Mix Policy SG4: Affordable Housing	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Persimmon Homes (397/5)  Homes for Scotland (476/2) (476/3)  Barrett Homes West (484/1)  Scottish Government (486/8)  Mactaggart &amp; Mickel (493/1) (493/2)  Robertson Homes (495/6)</p>		
<b>Provision of the development plan to which the issue relates:</b>	Section 4: Promoting Sustainable and Inclusive Economic Growth Meeting Housing Needs	
<b>Planning authority's summary of the representation(s):</b>		
<p><b><u>(a) Policy SG2: Housing Mix</u></b></p> <p><u>Persimmon Homes (397/5), Homes for Scotland (476/3), Barrett Homes West (484/1), Robertson Homes (495/6)</u></p> <ul style="list-style-type: none"> <li>• This policy states that proposals must provide a minimum 10% of all dwellings designed to be wheelchair accessible also stating that these properties should be built to Lifetime and Housing for Varying Needs standards. Homes within new developments will be built to HFVN standards including the 25% affordable requirement; therefore, it is unclear whether this policy is seeking a requirement over and beyond this by providing additional wheelchair access. The policy should be more precise.</li> <li>• Homes for Scotland understands the importance of addressing a variety of needs including the ageing population. However, the policy as currently worded is imprecise and is without a clear evidence base. Whilst there is a clear understanding of the needs of affordable housing customers due to waiting lists, this is not the case for market housing. Setting quotas, particularly without an understanding of the potential market is therefore a blunt policy instrument. There would be no way of ensuring such homes went to the households they were designed for. This element of the policy should be removed while appropriate evidence is prepared and consulted on.</li> <li>• The policy states that the justification for it is to align with the Council's Local Housing Strategy 2017-22 (LHS), but this does not appear to be the case. Priority 3 of the LHS (p.19) states that "We [ERC] will also endeavour to ensure that at least 10% of new social rented homes are, or can be made accessible, through the LHS and LDP" (our emphasis). The Strategic Housing Investment Plan (SHIP) 2019/20 – 2023/24 states that the 10% target for social housing "will cover a range of specialist needs, and does not refer solely to wheelchair accessible housing" (p.6). Importantly, the LHS applies to social housing, this is not aligned with Policy SG2 which applies the 10% target to all tenures.</li> </ul>		



- Neither the LHS nor the SHIP provide evidence on the number of households with disabilities looking to move market home rather than seek adaptations within their existing home. A good understanding of this would be necessary to inform discussions, which Homes for Scotland would welcome, on any further role market housing could play in addressing varying needs.
- Housing for Varying Needs is already incorporated into building standards and so new build homes already incorporate a much greater degree of adaptability than most existing housing stock. It is not clear whether the policy is seeking to go beyond existing building standards or not as it is not sufficiently precise.
- Homes for Scotland is keen to engage with Councils and Government to understand how market housing can further address the needs of households with varying needs. This could involve discussions with local healthcare providers and exploring how existing grants available could be utilised to build in required changes at the design / fit out stage rather adapting a finished home.

#### Scottish Government (486/8)

- Paragraphs 132-134 of SPP set out that Local Development Plans should address any specific specialist housing provision need identified. It is unclear from the plan whether this has been considered.

#### Mactaggart & Mickel (493/1)

- LDP2 does not address the pressing issue of housing affordability.
- LDP can allocate land in excess of the SDP (Clydeplan) requirements. There is a clear case for allocating over and above the requirements in order to address the issue of affordability.
- Policy SG2 imposes arbitrary requirements regarding wheelchair access and adaptability.

#### **(b) Policy SG4: Affordable Housing**

##### Homes for Scotland (476/2)

- Consider that the 25% requirement is appropriate and consistent with SPP. However, the threshold of just 4 dwellings is unduly onerous for small builders. The recovery of small and medium sized builders has been particularly slow and this portion of the market continues to face many acute challenges.
- Support flexible approach and assessment on a case by case basis. This is prudent, particularly given funding uncertainty post 2021 when different solutions may be necessary.
- HFS recently published report Small Scale Home Builders: Increasing Supply (November 2019) recommends a threshold of at least 12 dwellings for planning obligations. HFS consider this would be an appropriate threshold to use instead of 4 and the policy should be amended accordingly.

##### Mactaggart & Mickel (493/2)

- SG4 is illogical - there is no point having a 25% requirement when no new allocations will be made.

**Modifications sought by those submitting representations:****(a) Policy SG2: Housing Mix**

Persimmon Homes (397/5), Homes for Scotland (476/3), Barrett Homes West (484/1), Robertson Homes (495/6)

- Quota element of the policy should be removed while appropriate evidence is prepared and consulted on.

Scottish Government (486/8)

- The plan should confirm whether there is a need for sites to be allocated for Gypsy/ Travellers and Travelling Showpeople.

Mactaggart & Mickel (493/1)

- Policy SG2 should be changed to delete first sentence in second paragraph.

**(b) Policy SG4: Affordable Housing**

Homes for Scotland (476/2)

- Policy should be revised to a threshold of at least 12 dwellings.

Mactaggart & Mickel (493/2)

- Delete Policy - there is no requirement for SG4 unless the LDP2 identifies new housing sites to which it would apply.

**Summary of responses (including reasons) by planning authority:****(a) Policy SG2: Housing Mix**

Persimmon Homes (397/5), Homes for Scotland (476/3), Barrett Homes West (484/1), Mactaggart & Mickel (493/1), Robertson Homes (495/6)

- The Council's Local Housing Strategy 2017- 2022 (LHS) (CD/@@) advises that enhanced accessibility standards for new build homes are expected to make a significant impact on the profile of the housing stock over time and that we will endeavour to ensure that at least 10% of new social rented homes are, or can be made accessible, through the LHS and LDP.
- Although it would have been preferable to keep the quota requirement for adaptable or wheelchair accessible homes within the Policy, it is acknowledged that this would be difficult to enforce without any specific drive from the Scottish Government on National requirements.
- The Proposed Plan aims to encourage the private sector to develop and include within all proposals properties which are truly adaptable to a lifetime of needs, ideally pushing beyond the minimum requirements of building standards.

- Increasing the adaptability and responsiveness of homes is the key aim, therefore the focus should be on providing homes which can develop to meet the needs of all households as they change over time, through age or disability etc.
- In order to provide further clarity to the Policy, the Council would be supportive of the following modifications:
- On page 98, Policy SG2: Housing Mix, Paragraph 1 add the following text into the last sentence to read (revised text in italics):  
*The different types and sizes of housing are required to be well integrated throughout the development.*
- On page 98, Policy SG2: Housing Mix, delete paragraph 2 and insert a new paragraph 2 to read (revised text in italics):  
*Proposals should include houses which are adaptable and responsive to a lifetime of needs. In addition to the requirements of building standards, due consideration should be given to unit type, internal room sizes and overall plot size to ensure that units are accessible to as wide a range of people as possible, and that there is potential for future adaptation. This requirement is in addition to the requirements of Policy SG4.*

#### Scottish Government (486/8)

- Available data on the need for specific specialist housing provision comes from the strategic Housing Need and Demand Assessment (HNDA) (CD/@@), the accompanying evidence to the LHS and the Scottish Government, however this data tends to relate primarily to broader demographics or specifically to socially rented/ affordable housing only. Any improvement to this data would come from the forthcoming HNDA and the work for the new LHS when that gets underway.
- The Council's LHS gives the commitment that the needs of Gypsies / Travellers who live or migrate through East Renfrewshire, though low numbers, will continue to be monitored on an ongoing basis. There is currently no site provision within East Renfrewshire or significant demand for this, however if emerging data changes this position, adjustments could be made. The LHS commits to working with neighbouring Council's to address emerging needs and ensuring our approach to managing encampments is in line with national guidance.
- The Council would be supportive of the following amendment which may add further clarity to the Policy:  
On page 97, following the last paragraph, insert a new paragraph to read (revised text in italics):  
*The Council's LHS confirms that there is currently no demand for sites to be allocated for Gypsy / Travellers and Travelling Showpeople. The Council is committed to working with neighbouring Council's to increase our understanding of Gypsy Traveller needs in the local area and our practice in line with national guidance.*

#### Mactaggart & Mickel (493/1)

- Justification for the Development Strategy of the Proposed Plan is demonstrated under Issue 2. The Council's approach to housing supply is addressed under Issue 14.
- The Council maintains that the Proposed Plan, through Strategic Policy 1, Policy SG1, SG2 and SG4 provides a generous land supply with a range and choice of housing sites to deliver housing needs across all tenures and to provide sustainable

mixed communities and places in accordance with Para 122 of SPP (CD/@@) and Clydeplan (CD/@@) throughout the Plan period.

- Policy SG4 will apply to all residential proposals of 4 or more dwellings to provide a minimum 25% affordable housing contribution.
- In addition the Proposed Plan supports the implementation of the affordable housing sites listed in Schedule 16, which have been specifically allocated for affordable housing and housing for particular needs (100% affordable housing sites). This includes the Council's own house building programme which is a key priority during the plan period.
- The Council therefore disagrees that the strategy of the Plan will fail to deliver the required levels of affordable housing over the plan period.
- It is not proposed to modify the Plan based upon the above.

#### **(b) Policy SG4: Affordable Housing**

##### Homes for Scotland (476/2)

- The support for the Council's 25% requirement, in line with SPP, is welcomed.
- The Council considers that there is sufficient affordable housing need, identified and evidenced in Clydeplan, Strategic HNDA, LHS and the Proposed Plan to maintain the Council's policy position of seeking affordable housing contributions where planning permission is sought for residential development of 4 or more dwellings.
- Scottish Government Planning Advice Note 2/2010: Affordable Housing and Housing Land Audits (PAN 2/2010) (CD/@@) advises that where a requirement for affordable housing is set out in the development plan, developments should take this into account in their financial appraisal of the site. This applies to sites of all sizes.
- PAN 2/2010 does recognise that on smaller sites, on site provision will often be possible. The Council's Affordable Housing Supplementary Planning Guidance (SPG) (CD/@@) takes a flexible approach in dealing with smaller sites and where sites may be unsuitable for affordable housing, for example due to the small scale of the proposal, practical or locational circumstances, the Council may accept the payment of a commuted sum, or off site provision. The SPG also allows for consideration of viability and reduced contributions.
- The support for the flexible approach of the policy is welcomed.
- It is not proposed to modify the Plan based upon the above.

##### Mactaggart & Mickel (493/2)

- The Council disagrees with the suggestion that Policy SG4 should be deleted. There is a significant pressure for affordable housing throughout the Council area. The current Strategic HNDA estimates that in East Renfrewshire there is a total need for 880 affordable homes during the period 2012-2029. It is therefore important that both the LHS and the Proposed Plan continue to address this issue. The Council's firm view that the policy requires to remain in place and should continue to apply to all new planning applications received proposing 4 or more residential units. The Council will also deliver its own affordable housing through a Council new build programme.
- It should be noted that not all housing allocations carried forward from the Council's current adopted LDP1 (CD/@@) benefit from planning permission, therefore when

applications are received from these sites, the policy will need to be in place in order for the Council to secure appropriate affordable housing contributions.

- There are also numerous other scenarios where the policy would require to apply, for example where extant applications lapse and new proposals come forward; where a site and new developers come forward with different development proposals; or where a developer wishes to amend their approach beyond a non-material variation and a new application is required.
- It is not proposed to modify the Plan based upon the above.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue 29</b>	<b>Economic Development</b>	
<b>Development plan reference:</b>	Policy SG5: Economic Development Policy SG8: Digital Communications Infrastructure Policy SG9: Tourism and Visitor Economy	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Scottish Natural Heritage (178/10)  Scottish Enterprise (250/1) (250/2)  Broom, Kirkhill and Mearnskirk Community Council (255/16)  VisitScotland (472/1)  Aldi Stores (474/3)</p>		
<b>Provision of the development plan to which the issue relates:</b>	Chapter 4: Promoting Sustainable and Inclusive Economic Growth Promoting a Successful Economy	
<b>Planning authority's summary of the representation(s):</b>		
<p><b><u>(a) Policy SG5: Economic Development</u></b></p> <p><b><u>Support</u></b></p> <p><u>Scottish Enterprise (250/1)</u></p> <ul style="list-style-type: none"> <li>• Scottish Enterprise supports the reference to sustainable and inclusive growth which is in alignment with the Scottish Government's Economic Strategy and SE's Strategic Framework.</li> </ul> <p><u>Aldi Stores (474/3)</u></p> <ul style="list-style-type: none"> <li>• Note Policy SG5 acknowledges the economic benefits retail contributes towards a strong and competitive local economy and the creation of a skilled workforce, with criteria 5 supporting new retail development in town centres to support their continued vitality and viability.</li> <li>• Supports this position and the role retail plays in promoting economic development in centres.</li> </ul> <p><b><u>Objection</u></b></p> <p><u>Scottish Enterprise (250/2)</u></p> <ul style="list-style-type: none"> <li>• Scottish Enterprise supports Policy SG5 on the understanding that the 'employment generating uses' referenced are not restricted to Class 4, 5 and 6 on the basis that other uses out with these classes are often capable of generating employment levels and can often be enablers of development.</li> <li>• Appreciates the need to have an Economic Development policy that takes a flexible approach to the use of safeguarded business and employment areas where</li> </ul>		

appropriate. However query what kind of evidence will be required to be provided by developers for proposals for non-employment generating development including housing on the safeguarded business and employment areas.

- At the time of an application, could an assessment be undertaken of the land values the safeguarded areas are being marketed at to assess whether they have been priced appropriately for business/industrial uses. This would prevent a landowner from rendering them unviable for business/industry to promote them for housing, for example, through the current proposed policy?
- Could the Council consider an audit be undertaken, if not already done, to determine how much of the land within safeguarded areas is viable (served or easily serviceable) and the distribution of this land around the authority. This could then be taken into consideration when proposals for alternative uses come forward to ensure developers/landowners are not removing land which is most viable for business/industry uses and would ensure the remaining land could accommodate demand for the remainder of the plan's lifecycle.

Broom, Kirkhill and Mearnskirk Community Council (255/16)

- Decisions made by the Planning Applications Committee do not always appear to follow these guidelines where planning permission granted during the development of the Maidenhill development have focussed upon the provision of housing without the integration of any local commercial enterprises.

**(b) Policy SG8: Digital Communications Infrastructure**

Scottish Natural Heritage (178/10)

- The consideration given to the character and amenity in relation to communications infrastructure is welcomed. However, proposals should also ensure that there are no adverse impacts on landscape setting or visual amenity. Additionally, the Policy should ensure that there are no adverse cumulative impacts as a result of digital and communications infrastructure.

**(c) Policy SG9: Tourism and Visitor Economy**

VisitScotland (472/1)

- The upgrading of various transport links that are contained within the plan including roads, public transport and active travel options all help to improve access into the region and open up new potential investment opportunities.
- What is good for local communities is highly likely to be good for visitors.
- Tourism has a unique dependency on quality environments, cultural distinctiveness, social interaction, security and wellbeing.
- Tourism as a sector is not only a notable contributor to climate change but stands to also directly suffer its consequences.

**Modifications sought by those submitting representations:**

**(b) Policy SG8: Digital Communications Infrastructure**

Scottish Natural Heritage (178/10)

- Insert the following text into Policy SG8: Digital Communications Infrastructure: “The Council support the provision and expansion...provided they will not result in a detrimental impact, *including cumulative*, upon the *setting*, character or *visual amenity* of an area”.

### Summary of responses (including reasons) by planning authority:

#### **(a) Policy SG5: Economic Development**

##### **Support**

##### Scottish Enterprise (250/1), Aldi Stores (474/3)

- The Council acknowledges and welcomes the support for Policy SG5 through its alignment with Scottish government – Economic Strategy and Scottish Enterprise – Strategic Framework, together with acknowledgement that retail can make a contribution to supporting a competitive local economy, especially where it can help support the continued vitality and viability of town centres in accordance with Policy SG10.
- It is not proposed to modify the plan based upon the above.

##### **Objection**

##### Scottish Enterprise (250/2)

- The Proposed Plan seeks to strengthen and diversify the local economy to allow new and existing businesses to thrive, improve inward investment and boost job opportunities and provide access to local employment. A range of sites across the Council area are safeguarded for economic use and proposals for new business uses identified. The Proposed Plan provides a flexible approach to economic delivery supporting employment generating uses on such sites through Policy SG5.
- In relation to non-employment generating development including housing on safeguarded business and employment areas the Council makes the following responses.
- Policy SG5 allows for consideration of viability. The onus is on the applicant to provide information supporting their application in this regard. Applications will be considered on a case by case basis and viability will be a key consideration.
- Indications on viability can be varied and often bespoke to a particular business and location, and are also snap shots in time, given that business activity is such a dynamic process. The complexities of ownership interests, land values and the maximisation of profit play a crucial role in the determination of business viability, which is bespoke for each individual situation and over which planning authorities have both a very limited role.
- The purpose of Planning is to manage the development and use of land in the long-term public interest, the planning system is required to operate within the public domain, whereas the business sector has to operate competitively with the necessity for business confidentiality.
- An Annual Business Land Audit is undertaken which follows an established and consistent process for each Clydeplan authority. It is undertaken individually by each constituent authority then compiled and collated at the regional Clydeplan



level. This annual audit shows what is considered marketable and potentially marketable in accordance with Paras 101 to 102 of Scottish Planning Policy (SPP) (CD/@@) and changes to the business and employment land supply.

- The information from these annual audits are validated and used nationally for various annual Scottish government indicators such as (Planning Performance Indicators, SLAED and LGB returns) and provide an accepted indication of the business land situation within each authority including East Renfrewshire.
- The monitoring report (2017/18) (CD/@@) confirms that East Renfrewshire with (15.8Ha) had the lowest amount of marketable Business land, within the Clydeplan area. Despite this East Renfrewshire is one of 6 authorities with over 20 years supply. The supporting commentary provides an insight into the current local business land picture. The location of the marketable sites are also shown. This audit has a role in the consideration of the spatial element to the Economic Development policy and the associated business land.
- The Council is of the view that the comments on viability and monitoring of the land supply is covered within Policy SG5.
- It is not proposed to modify the plan based upon the above.

#### Broom, Kirkhill and Mearns Kirk Community Council (255/16)

- The Maidenhill master plan SPG (CD/@@) sets out a comprehensive approach to the delivery and phasing of the site. Principally the site provides for a long-term supply of land for residential development. However the master plan also includes other community facilities such as a primary school (open and operational Autumn 2019), open space/play areas, a landscape framework and green networks, community and leisure facilities and neighbourhood scale/retail/mixed uses.
- The former Malletsheugh Inn site is identified within the master plan and the Proposed Plan for mixed use retail/commercial proposals (SG6.6 and SG11.10) and to provide a community focus for the master plan area.
- The phasing and timing of how different elements within the master plan site are brought forward is key. Proposals for commercial enterprises are dependent on market conditions and usually follow the development of housing proposals when a population of sufficient scale is established within an area. This is a private commercial consideration over which the Council has no influence. However, the Council is supportive of retail and commercial development within the master plan area.
- Pre application discussions have been held regarding potential retail/commercial uses and other neighbourhood centre uses such as doctors/dentists. To date no planning application has been submitted.
- In relation to the planning application committee the council is required, by the planning acts to assess development proposals, against the development plan, supporting statutory SPG and any other material considerations, relevant to each individual case without prejudice.
- It is not proposed to modify the plan based upon the above.

#### **(b) Policy SG8: Digital Communications Infrastructure**

##### Scottish Natural Heritage (178/10)

- The consideration given to the character and amenity in relation to Policy SG8 is welcomed.

- It is acknowledged that proposals should also demonstrate that there is no adverse impacts on landscape or visual amenity and that their cumulative impact are also considered. The 5<sup>th</sup> and 7<sup>th</sup> bullet points of paragraph 4 of the policy refers to cumulative effects and visual impacts respectively. However, the Council agrees that additional reference to landscape setting, visual amenity and their cumulative impacts would strengthen the policy.
- If the Reporter is so minded to recommend that the representation from SNH is accepted and the Plan modified, as set out below, the Council would be supportive of this modification.
- Paragraph 1 of Policy SG8 should be amended to read (revised text italics):  
The Council support the provision and expansion...provided they will not result in a detrimental impact, *including cumulative*, upon the *setting*, character or *visual amenity* of an area.

### **(c) Policy SG9: Tourism and Visitor Economy**

#### VisitScotland (472/1)

- The Council acknowledges and welcomes the support for the range of various measures (visitor centre, transport links, utilising range of modes) which will help to encourage new and repeat visits to the area, and open up new potential investment opportunities.
- It is not proposed to modify the plan based upon the above.

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**

<b>Issue 30</b>	<b>Town and Neighbourhood Centres</b>	
<b>Development plan reference:</b>	Policy SG10: Town and Neighbourhood Centre Uses	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
Aldi Stores (474/1) (474/2)		
<b>Provision of the development plan to which the issue relates:</b>	Chapter 4: Promoting Sustainable and Inclusive Economic Growth	
<b>Planning authority's summary of the representation(s):</b>		
<p><b><u>Support</u></b></p> <p><u>Aldi Stores (474/2)</u></p> <ul style="list-style-type: none"> <li>Fully support the 'town centre first principle' set out within SPP and within the emerging LDP2.</li> <li>Note that part 1 of Policy SG10 promotes new retail investment within LDP2's defined network of town and neighbourhood centres as a result.</li> </ul> <p><b><u>Object</u></b></p> <p><u>Aldi Stores (474/1)</u></p> <ul style="list-style-type: none"> <li>Object to Part 2.c. This does not reflect SPP which states that there need only be "a quantitative or qualitative deficiency" to be present.</li> <li>Object to Part 2.d. This test does not comply with SPP though which states that proposals will be accepted provided that "there will be no significant adverse effect on the vitality and viability of existing town centres." The current LDP2 wording therefore sets what could be considered a more onerous planning test, which is not compliant with national policy.</li> </ul>		
<b>Modifications sought by those submitting representations:</b>		
<p><u>Aldi Stores (474/1)</u></p> <ul style="list-style-type: none"> <li>Policy SG10 requires to be revised to reflect SPP as follows: <ul style="list-style-type: none"> <li>2.c: "Demonstrate that the proposal will help to meet proven qualitative and or quantitative deficiencies".</li> <li>2.d: "Demonstrate that there will be no unacceptable individual or cumulative impact on the vitality and viability of any town or neighbourhood centre"</li> </ul> </li> </ul>		

**Summary of responses (including reasons) by planning authority:****Support**Aldi (474/2)

- The Council acknowledges and welcomes the support for Policy SG10: Town and Neighbourhood Centre Uses.
- It is not proposed to modify the Plan based upon the above.

**Objection**Aldi (474/1)

- The objection to an element of the wording within criterion (2c) of Policy SG10 references paragraph 73 of Scottish Planning policy (SPP) (CD/@@). It is acknowledged that paragraph 73 3<sup>rd</sup> bullet point states that out of centre locations should only be considered through a range of considerations including whether the proposal will help to meet qualitative or quantitative deficiencies. Proposals can demonstrate a deficiency in either factor, not necessarily concurrently. It is accepted that (criterion 2c) would be more accurately worded as 'proven qualitative or quantitative deficiencies'.
- Therefore if the reporter is so minded to recommend that the representation from (Aldi) in relation to criterion (2c) is accepted and the Plan modified, as set out below, the Council would be supportive of these modifications because they would more accurately reflect SPP.
- Criterion (2c) should be amended to read (revised text in italics):  
Demonstrate that the proposal will help to meet proven qualitative ~~and~~ or quantitative deficiencies.
- The representation also objects to criterion (2d) of policy SG10. Reference is made to the 4<sup>th</sup> bullet point of paragraph 73, which states that "*there will be no significant adverse effect on the vitality of existing town centres*". It is acknowledged that that SPP does not specifically reference neighbourhood centres. However paragraph 70 of SPP is also applicable, and states that "*the impact of new development on the character and amenity of town centres, local centres...will be a material consideration in the decision making*". Therefore it is considered that the existing wording of the Policy SG10- (criterion 2d), which includes reference to both Town and Neighbourhood centres, reflects the spirit and meaning of SPP (paragraph 70). The neighbourhood centres within East Renfrewshire are considered comparable to local centres referenced within SPP.
- Consequently it is considered not unreasonable and within the spirit of the SPP that proposals demonstrate that there are no unacceptable individual impact on the vitality and viability of the entire network of centres which includes both town and neighbourhood centres.
- It is not proposed to modify the plan based upon the above.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue 31</b>	<b>Sustainable Design</b>	
<b>Development plan reference:</b>	Policy E1: Sustainable Design	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>R O'Brien (177/1)  Broom, Kirkhill and Mearns Kirk Community Council (255/22) (255/23)  Alison Lee (278/2)  Woodland Trust Scotland (376/7)  Homes for Scotland (476/1)  Scottish Government (486/4) (486/7)  Robertson Homes (495/7)  Scottish Power Renewables (496/1)</p>		
<b>Provision of the development plan to which the issue relates:</b>	Section 5: Promoting a Low Carbon Place	
<b>Planning authority's summary of the representation(s):</b>		
<p><b><u>Support</u></b></p> <p><u>Broom, Kirkhill and Mearns Kirk Community Council (255/22)</u></p> <ul style="list-style-type: none"> <li>Strongly endorses East Renfrewshire's aim that delivering a low carbon future is central to the Proposed Plan's Development Strategy.</li> </ul> <p><b><u>Objections</u></b></p> <p><u>R. O'Brien (177/1)</u></p> <ul style="list-style-type: none"> <li>LDP2 lacks ambition for tackling climate the climate and biodiversity emergency and meeting net zero carbon by 2045.</li> <li>Strong headline policy in sustainable design should be front and centre in the LDP2.</li> <li>Policy E1 is not strong enough and will be ineffectual in reducing carbon emissions to the degree required.</li> <li>Section 6 (energy) - building standards set too low.</li> </ul> <p><u>Broom, Kirkhill and Mearns Kirk Community Council (255/23)</u></p> <ul style="list-style-type: none"> <li>All new build within East Renfrewshire should be encouraged to incorporate solar panel generating facilities on roofs.</li> </ul> <p><u>Alison Lee (278/2)</u></p>		

- Suggest Council consider a 'Carbon Tax' to help stop 'selling off' natural greenspace assets.

Woodland Trust Scotland (376/7)

- The new Climate Change (Emissions Reductions) (Scotland) Act has now passed and it may be appropriate to recognise its provisions within the LDP. The biodiversity emergency should be recognised as equally important to the climate emergency and they be addressed together. The Council should recognise the need to adapt to changing climate even after the zero emissions target is met.

Homes for Scotland (476/1), Robertson Homes (495/7)

- Homes for Scotland agrees with the intent of this policy. However, it is important that the planning regime doesn't duplicate or cover the same ground as building standards. This adds unnecessarily to the already complex development process. It is not consistent with prioritising efficient processing of applications.

Scottish Government (486/4), Scottish Power Renewables (496/1)

- To accord with latest climate change targets, the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, which amends the Climate Change (Scotland) Act 2009, sets targets to reduce Scotland's emissions of all greenhouse gases to net-zero by 2045 at the latest. This should be better reflected in LDP2 and the reference on page 122 to year 2025 should be corrected to "2045"

Scottish Government (486/7)

- It is noted that the Council intends to put more detail in the Supplementary Guidance on Low and Zero Carbon Delivery it is not clear what details relating to Section 3F of the Town and Country Planning (Scotland) Act 1997 (as amended) may be given in that guidance. It is also unclear whether that would be Statutory Supplementary guidance. Nevertheless, the legislation is clear that it is the local development plan policies which must set out the position, not guidance.

**Modifications sought by those submitting representations:**

Alison Lee (278/2)

- Suggest Council consider a 'Carbon Tax' to help stop 'selling off' natural greenspace assets.

Homes for Scotland (476/1), Robertson Homes (495/7)

- Criterion 2 should be deleted, as such specific issues are already addressed by building standards.

Scottish Government (486/4), Scottish Power Renewables (496/1)

- Climate Change Bill emissions reductions target should be corrected from "2025" to "2045".

Scottish Government (486/7)

- Policy E1 'Sustainable Design' on page 124 should be modified to fully take account of the requirements of section 3F of the Town and Country Planning (Scotland) Act 1997. The following text should be added to the end of the text at E1 subsection 2:

*"Proposals for all new buildings will be required to demonstrate that at least 10% of the current carbon emissions reduction set by Scottish Building Standards will be met through the installation and operation of low and zero-carbon generating technologies. A statement will be required to be submitted demonstrating compliance with this requirement. The percentage will increase at the next review of the local development plan.*

*This requirement will not apply to:*

- 1) *Alterations and extensions to buildings*
- 2) *Change of use or conversion of buildings*
- 3) *Ancillary buildings that stand alone and cover an area less than 50 square metres*
- 4) *Buildings which will not be heated or cooled, other than by heating provided solely for frost protection.*
- 5) *Buildings which have an intended life of less than two years.*

**Summary of responses (including reasons) by planning authority:****Support**Broom, Kirkhill and Mearnskirik Community Council (255/22)

- The Council acknowledges and welcomes the support for Policy E1 and for the Council's aim of delivering a low carbon future within the Proposed Plan's Development Strategy.
- It is not proposed to modify the Plan based upon the above.

**Objections**Broom, Kirkhill and Mearnskirik Community Council (255/23)

- The Community Council suggests that all new build within East Renfrewshire should be encouraged to incorporate solar panel generating facilities on roofs.
- The Council has Supplementary Planning Guidance (SPG) on Energy Efficient Design, and renewables is discussed and encouraged in section 3.4. Further guidance and information will also come forward in the SPG on Low and Zero Carbon Delivery. The Council considers that the SPGs are the appropriate place for this advice.
- It is not proposed to modify the Plan based upon the above.

R. O'Brien (177/1)

- R. O'Brien states that LDP2 lacks ambition for tackling climate change. The LDP is only one contributor to the Council's actions on climate change and the Council is reviewing its corporate approach to Climate Change through its revised Climate Change Strategy. The LDP2 is very clear, for example in Strategic Policy 1:

Development Strategy that sustainability is a very important policy objective; and in policy D7 seeks to protect and enhance the natural environment.

- Comments on the promotion of sustainable design being front and centre within the plan. This is indeed promoted in Strategic Policy 1 which has the objective of creating "... sustainable, well designed, connected, health, safe and mixed communities and places". This is in addition to Policy E1: Sustainable Design.
- Representation states that Policy E1 is not strong enough and will be ineffectual in reducing carbon emissions to the degree required. The Council's view is that the criteria within Policy E1 are a reasonable response to promoting sustainable design, without being prescriptive or setting standards or requirements that are not attainable or reasonable.
- Representation states that Section 6 (energy) of the Building Standards and silver sustainability level are set too low. Planning policy can do no more than encourage developers to meet certain high building standards as these are controlled under separate legislation. We believe that the policies as included in the LDP, and in particular Policy E1 which promotes the incorporation of low and zero carbon technologies in new development (and retro-fitted to existing buildings) complies with the requirement of Section 3F of the Town and Country Planning (Scotland) Act 1997 (as amended).
- Other comments are noted by the Council, but further specific amendments are not proposed to the LDP and none are considered appropriate.
- It is not proposed to modify the Plan based upon the above.

#### Alison Lee (278/2)

- The representation suggests that the Council should consider establishing a 'Carbon Tax'. The Council is not the tax authority and has no powers in this regard.
- The Proposed Plan seeks to protect, enhance and increase the amount and quality of greenspaces. This is clearly evidenced in Spatial Objective 1.4, Strategic Policy 1 and Policy D5. With regards to the Council 'selling off' natural greenspace assets, the Council is not proposing to sell such assets (the situation at Braidbar Quarry is specifically discussed under Issue 6).
- It is not proposed to modify the Plan based upon the above.

#### Woodland Trust Scotland (376/7)

- The representation suggests that the biodiversity emergency should be recognised as equally important to the climate emergency and be addressed together. The Council accepts that climate and biodiversity matters are important but consider that the policy context is quite clearly set out in the LDP (the natural environment is addressed in pages 60-67 of the plan) and that the matters don't need to be grouped together in the Plan. The Council accepts that there is a need to adapt to a changing climate, and the LDP addresses this issue on page 123 and subsequent pages.
- It is not proposed to modify the Plan based upon the above.

#### Homes for Scotland (476/1), Robertson Homes (495/7)

- The representation suggests that the planning regime doesn't duplicate or cover the same ground as building standards and that criterion 2 of Policy E1 be deleted. The Council generally agrees with this comment, however Councils are obliged to comply with Section 3F of the Town and Country Planning (Scotland) Act 1997 (as



amended) which requires planning authorities, in any local development plan prepared by them, to include reference to the installation of low and zero-carbon-generating technologies in order to improve energy efficiency. Energy efficiency is already measured through the building regulations, so it is appropriate that these standards be used to fulfil this legislative requirement and that this criterion remains.

- It is not proposed to modify the Plan based upon the above.

#### Scottish Government (486/7)

- The Scottish Government propose an amendment to Policy E1 in order that the plan accords with Section 3F of the Town and Country Planning (Scotland) Act 1997 (as amended). The Council has considered the matter further and agrees that Policy E1 should be amended. The following proposed modification of criterion 2 is similar to that proposed by the Scottish Government, is considered to meet the requirements of Section 3F whilst retaining some of the original wording of the policy. Policy E1 should be modified as follows:

Delete Criterion 2 of Policy E1 and insert replacement criterion.

~~2. Incorporate sustainable and energy efficient design and construction methods (through low and zero carbon generating technology in the development's construction and end use), as an integral part of the design process from the outset. Proposals should demonstrate compliance with Section 6 (energy) of the current Building Standards. All new buildings must be built to meet a minimum of silver sustainability standards and aim to achieve higher;~~

2. Developments should incorporate sustainable and energy efficient design and construction methods and be built to meet a minimum of silver sustainability standard. All new buildings should be designed to ensure that at least 10% of the carbon dioxide emissions reduction standard set by Scottish Building Standards is met through the installation and operation of low and zero-carbon generating technologies. This percentage will increase at the next review of the Local Development Plan. Other solutions will be considered where:

(a) it can be demonstrated that there are significant technical constraints to using on-site low and zero-carbon generating technologies; or

(b) there is likely to be an adverse impact on the historic environment.

This requirement will not apply to:

- alterations and extensions to buildings;
  - change of use or conversion of buildings;
  - ancillary buildings that stand alone and cover an area less than 50 square metres;
  - buildings which will not be heated or cooled, other than by heating provided solely for frost protection;
  - Buildings which have an intended life of less than two years.
- The Scottish Government also queried the content and status of the Supplementary Planning Guidance (SPG) on Low and Zero Carbon Delivery. The Council intendeds that the SPG will give further guidance on how policy E1 will be applied, the types of technology that may be used, how and where it may be located on-site and its impact on the built environment. The status of the SPG will accord with the legislation at the time of adoption.
  - It is not proposed to modify the Plan based upon the above.

Scottish Government (486/4), Scottish Power Renewables (496/1)

- The Scottish Government and Scottish Power Renewables propose updates/corrections to the first paragraph of page 122 to make reference to the Climate Change (Emissions Reduction Targets)(Scotland) Act 2019. At the time of writing this report, the Council is considering the proposal to support the Scottish Government's target of being carbon neutral by 2040.
- The Council agrees that the first paragraph on page 122 should be amended. If the Reporter is so minded to recommend that the representation from the Scottish Government and Scottish Power Renewables is accepted and the Plan modified, as set out below, the Council would be supportive of this modification.  
First Para page 122 should be amended to read (revised text in italics):  
The Scottish Government's commitment to energy reduction and responding to climate change is established in the Climate Change (Scotland) Act 2009 as amended by the Climate Change (Emissions Reduction Targets)(Scotland) Act 2019. The Council supports the Scottish Government's targets of net-zero emissions of greenhouse gasses by 2045 and being carbon neutral by 2040. The policies in this plan make a significant contribution to this aim. The Climate Change Bill aims to increase reduction targets for all greenhouse gases by 2025. This means net-zero emissions of carbon dioxide by 2050 to make Scotland carbon neutral.

**Reporter's conclusions:**

**Reporter's recommendations:**

<b>Issue 32</b>	<b>Renewable Energy</b>	
<b>Development plan reference:</b>	Policy E2: Renewable Energy	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Veronica Byrne (147/1)  Scottish Natural Heritage (178/11)  Broom, Kirkhill and Mearnskirk Community Council (255/24)  Persimmon Homes (397/6)  Scottish Government (486/3)  Tarmac (491/2)  Scottish Power Renewables (496/1)</p>		
<b>Provision of the development plan to which the issue relates:</b>	Section 5: Promoting a Low Carbon Place Pages 125 to 127	
<b>Planning authority's summary of the representation(s):</b>		
<p><b><u>Support</u></b></p> <p><u>Tarmac (491/2)</u></p> <ul style="list-style-type: none"> <li>Strongly support identification of our client's land at Bannerbank Quarry as having strategic capacity for renewable energy development. The site is identified as having strategic capacity for wind farm development within Figure 15, falling within 'Group 3' of the Spatial Framework. The Group 3 area is recognised by SPP (2014) as having potential for wind farms. New developments are likely to be acceptable, subject to detailed consideration against identified policy criteria outlined within Local Planning Policy. Tarmac supports this policy designation and opportunities for renewable development in this area.</li> </ul> <p><b><u>Objections</u></b></p> <p><u>Veronica Byrne (147/1)</u></p> <ul style="list-style-type: none"> <li>Objection to wind turbines in vicinity of dwelling</li> <li>Objection on grounds wind turbines would be close to Glasgow airport radar.</li> </ul> <p><u>Scottish Natural Heritage (178/11)</u></p> <ul style="list-style-type: none"> <li>Whilst <i>Figure 15</i> seems to have been informed by the findings of the Landscape Capacity Study 2014, some of the areas (e.g. Rugged Upland Farmland) have higher sensitivity, and therefore less capacity, than areas such as Plateau Moorland. However, the mapping in <i>Figure 15</i> appears to make no distinction. It would be helpful to clarify how the proposed areas in the Spatial Framework for</li> </ul>		

Wind Energy have been informed in landscape terms. A legend should also be added to Figure 15 to clarify the purple shading.

Broom, Kirkhill and Mearnskirk Community Council (255/24)

- The provision of land for the development of wind farms is encouraging but the development of wind farms is not universally agreed to be the best or only means of generation of green energy.

Persimmon Homes (397/6)

- The provision of a heat network is one of a range of energy solutions that can be considered to address the need to reduce carbon emissions within residential developments. Other solutions are available and include high efficiency hybrid boiler systems, solar photovoltaic panels and for housing sustainable methods of construction, including timber kit, as well as the most obvious method which is to reduce energy demand in the first place through the provision of energy efficient housing. The solution proposed in each case will vary based on the type and location of development proposed along with the cost and efficiency of low carbon technology which continues to evolve.
- As part of a wider programme, work is ongoing across Scotland to investigate and identify the projects and areas where district heating would gain most benefit and be the most technically suitable and commercially viable. The general guidance for users of the heat map is that areas with high heat density are more likely to be feasible for District Heating.
- The Heat Map is available which demonstrates where major energy loads are located in East Renfrewshire. East Renfrewshire lacks the big anchor developments, such as a shopping centre to make a dedicated heat network viable. The suggested policy requires developments adjacent to existing or proposed heat networks to allow for a future connection to a heat network where an immediate connection is not possible. In developments where there will be a range of owners, such as a housing development, it would be unreasonable to attach this requirement. It would be an undue cost to retrofit a solution at a later date and is proven only to work when installed from the outset in high density residential developments.
- CHP systems are appropriate for large mixed use or non-residential schemes where there is a large and constant heat load throughout the day. A comprehensive study by the Carbon Trust in 2007 (source – Introducing Combined Heat & Power, Carbon Trust 2007) confirmed that CHP schemes are only viable for developments where there is a high and constant heat demand. The heat demand for housing developments will peak in the morning and late evening for approximately 5-6 hours per day. The likely scale and low density of the development means that CHP is an unviable option. In addition to the demand for residential developments not being compatible with the require output of a CHP system the use and type of CHP systems being promoted are being reduced as the grid is being decarbonised and building regulations no longer support gas CHP. In addition to this the electrical grid may not be able to accommodate the CHP without substantial upgrading.

Scottish Government (486/3)

- It is not clear which areas in Figure 15 are Group 2 and which are Group 3 areas.

Scottish Power Renewables (496/1)

- The LDP2 should do more to establish a positive policy and decision making framework for new renewable energy developments across East Renfrewshire. The finalised LDP2 can play a full role in responding to the climate emergency.
- The LDP2 must make reference to the need to support the delivery of the new targets set out in the Climate Change Act 2019 for a legally binding net zero target of all greenhouse gases by 2045.
- The plan could go further to emphasise the positive role of renewables.
- The reference to "remaining capacity" in page 125 is a negative statement. SPR consider that new wind farm developments should be assessed on their own merits
- The LDP2 could increase emphasis on the need for balanced decision where landscape protection is not used as blocker but is a consideration that can be outweighed by the need to respond to the wider climate change emergency.
- Opportunities for repowering (expanding and redesigning operations in sites) should be viewed in more positive light.
- Would like clarification on the role that the Wind Energy Study (2012), the Landscape Capacity Study (2014) and the forthcoming Zero Carbon Delivery SPG will play in the future and how much weight ERC will give to these documents.
- The role of Landscape Capacity Studies in determining areas of search is under review and SPR expect that the LDP2 should avoid reliance on outdated studies.

**Modifications sought by those submitting representations:**Scottish Natural Heritage (178/11)

- Recommend clarifying how the proposed area of search in Figure 15: Spatial Framework for Wind Energy Development has been informed in landscape terms. We also recommend inserting a legend to clarify the purple shading.

Scottish Government (486/3)

- Figure 15 – Spatial Framework for Wind Energy Development should be updated to include a key to clearly identify Group 2 and Group 3 areas.

Scottish Power Renewables (496/1)

- Remove the reference in page 125 Para. 4 to "remaining capacity".
- In Policy E2 1st Para. insert after "The Council supports low.. and zero.
- In Policy E2 2<sup>nd</sup> Para. change "Where appropriate, applications will be required to submit demonstrate satisfactory mitigation measures to alleviate any unacceptable adverse effects".
- In Policy E2 2<sup>nd</sup> Para. change "negative" to "unacceptable" and "impacts" to "effects".
- In Policy E2 3<sup>rd</sup> Para. insert and zero after "All proposals for low and zero...
- In Policy E2 point 4 insert ...and will however be assessed on a site specific and case by case basis and in line with national renewable energy targets.
- In Policy E2 point 16 delete 'The need'...

## Summary of responses (including reasons) by planning authority:

### Support

#### Tarmac (491/2)

- The Council welcome the support for the policies applying to Bannerbank Quarry.
- It is not proposed to modify the Plan based upon the above.

### Objections

#### Veronica Byrne (147/1)

- The representation makes objection to wind turbines in vicinity of her dwelling; and also on the grounds that wind turbines in this location would be close to Glasgow airport radar.
- The Council has carefully considered the areas with potential for wind farm development and believes that the areas identified in Figure 15 strike a reasonable balance between promoting renewable energy development and protection for the amenity of existing settlements. With regards to impacts on individual houses, this is a valid consideration and is addressed in Policy E2, criterion 5, which requires all wind energy proposals to be considered in terms of: “...*visual impact, residential amenity, noise and shadow flicker*”. It is therefore considered that the impact on individual dwellings can be properly assessed within the context of the existing policy. With regards to impact on Glasgow Airport radar, this subject is also included in Policy E2, criterion 12, which includes: “*Impacts on aviation...*”. Additionally for information, all planning applications for wind farms or turbines in this area are subject to consultation with Glasgow Airport/Prestwick Airport/Civil Aviation Authority as appropriate. Further information is included within Policy D22: Airport Safeguarding. It is therefore considered that the Proposed Plan adequately covers the matters raised.
- It is not proposed to modify the Plan based upon the above.

#### Broom, Kirkhill and Mearnskirk Community Council (255/24)

- The representation states that the provision of land for the development of wind farms is encouraging but the development of wind farms is not universally agreed to be the best or only means of generation of green energy.
- The Council agree with the Community Council that wind farms are not the only means of generating green energy, however they make a very significant contribution to renewable energy generation.
- Para 155 of SPP is clear that ‘Development plans should seek to ensure an area’s full potential for electricity and heat from renewable sources is achieved.....’. Policy E2 specifically includes consideration of other forms or renewable energy, including solar energy, hydroelectric, biomass, district heating and energy from waste technologies – and all of these are supported in principle. It is therefore considered that the Proposed Plan adequately covers the matters raised and is in accordance with SPP.
- It is not proposed to modify the Plan based upon the above.

Persimmon Homes (397/6)


- The representation make a number of comments with regards to heat networks and combined heat and power systems (CHP).
- The comments are noted by the Council. The Council however considers that it is appropriate to retain the policy encouragement for the inclusion of heat networks which can bring significant carbon savings in some circumstances, and consider that no modification to the policy is required in this respect. The approach in the Proposed Plan is in accordance with Paras 158 to 160 of SPP.
- It is not proposed to modify the Plan based upon the above.


Scottish Natural Heritage (178/11), Scottish Government (486/3)

- The representations recommend inserting a legend to clarify the purple shading.
- If the Reporter is so minded to recommend that the representations are accepted and the Plan modified, as set out below, the Council would be supportive of this modification as it would provide clarity to Figure 15.
- Figure 15 should be amended as follows:

Figure 15 – Spatial Framework for Wind Energy Development

## Key

 (Unshaded areas) 'Group 2' areas of significant protection from wind energy development. Proposals will require to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation and assessment against the criteria in policy E2.

 (Purple shaded areas) 'Group 3' areas with potential for wind energy development, where wind energy development is likely to be acceptable subject to detailed consideration against the criteria in policy E2.

- In addition, to clarify the policy context for the Group 2 and 3 areas of the spatial framework it is proposed to amend the text at the beginning of the second paragraph of policy E2 so it is clear that that individual turbines (and not just wind farms) are supported in principle within the terms of the policy.
- Para 2 1<sup>st</sup> sentence should be amended to read (revised text italics):  
Proposals for solar energy, wind farm developments energy, hydroelectric .....

Scottish Natural Heritage (178/11)

- The representation recommends clarifying how the proposed area of search in Figure 15: Spatial Framework for Wind Energy Development has been informed in landscape terms. The supporting text explains that the spatial framework has been informed by the Council's Wind Energy Study (2012), but the Council agrees that further explanation and clarification would be helpful.
- If the Reporter is so minded to recommend that the representation from SNH is accepted and the Plan modified, as set out below, the Council would be supportive of this modification.
- Page 125 3<sup>rd</sup> Para final sentence should be amended to read (revised text in italics):  
The spatial framework was also informed by the Council's Wind Energy Study (2012), with Group 3 boundaries excluding land within 2km of the main settlements.

Sites of Special Scientific Interest (SSSI) and areas of Class 1 nationally important carbon-rich soils, deep peat and priority peatland habitat.

Scottish Power Renewables (496/1)

- Scottish Power Renewables (SPR) recommend a number of amendments.
- SPR ask that the second sentence of the second paragraph on page 123 be amended to read: “The overall aim is to ensure that any unacceptable effects [changed from “negative impacts”] upon the environment are avoided or mitigated”. The Council does not agree with this change and wishes to retain “negative impacts”. Where there are negative impacts, applications will not necessarily be refused permission, rather, where negative impacts are assessed to occur, the Council may seek modification to avoid those impacts or that mitigation occur to reduce or alleviate the negative impact.
- SPR asks that the final sentence on page 125, which refers to the reduction in the remaining capacity for wind farms be removed. The Council does not agree to this removal. Whitelee Windfarm is one of the largest onshore windfarms in Europe and it undoubtedly has a large visual impact on the area. The Proposed Plan is not precluding further windfarms are appropriate, but the statement sets the context for the 4<sup>th</sup> criterion of Policy E2 whereby the cumulative visual impacts can be assessed (see comments specifically on this 4<sup>th</sup> criterion below).
- SPR suggest that the Council should clarify the role that the Wind Energy Study (2012), the Landscape Capacity Study (2014) and future supplementary guidance will play in coming years, and how much weight the Council will give to these. The Council proposes an amendment to the third paragraph on page 125 under ‘Spatial Framework for Wind Energy Development’ as explained in the Scottish Natural Heritage response above. No further reference to future studies is necessary as it would not be appropriate to pre-judge the outcome of future studies.
- It is not proposed to modify the Plan based upon the above.
- SPR proposed a number of changes to Policy E2. The Council is supportive of a number of these amendments and disagrees with others, as discussed below.
- If the Reporter is so minded to recommend that the following amendments from SPR are accepted and the Plan modified, as set out below, the Council would be supportive of these modifications.
  - Para 1 1<sup>st</sup> sentence should be amended to read (revised text italics):  
The Council supports low *and zero* carbon renewable energy proposals in the form of ...
  - Para 2 3<sup>rd</sup> sentence should be amended to read (revised text italics):  
“Where appropriate, applications will require to *submit demonstrate* satisfactory mitigation measures to alleviate any adverse impacts”.
  - Para 3 1<sup>st</sup> sentence should be amended to read (revised text italics):  
“All proposals for low *and zero carbon* renewable energy developments....
  - Criterion 12 should be amended to read (revised text italics):  
12. ~~Impacts~~ *Impacts* on aviation....
- The Council does not accept the following proposed amendments.
  - Updates to criterion 4 are not supported, as it is unnecessary to say that applications will be assessed on a site specific and case by case basis, as all applications are assessed on their individual merits against the development plan and other material considerations. It is also not considered appropriate to mention national renewable energy targets here when this



criterion is not about national targets, it is about the cumulative impact of multiple developments on a local area.

- The Council is of the view that Criterion 16 is sufficiently clear and does not propose to modify the wording as suggested.
- SPR proposed an additional criteria 17 'Opportunities for energy storage'. The Council accepts that energy storage can make a contribution to renewable energy proposals, and such proposals will be considered on their merits. However the Council does not consider it appropriate that this is added as a criterion within Policy E2 i.e. a criterion to be used when assessing development proposals.
- It is not proposed to modify the Plan based upon the above.

**Reporter's conclusions:****Reporter's recommendations:**

<b>Issue 33</b>	<b>Noise</b>	
<b>Development plan reference:</b>	Policy E5:Noise	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
James Bennett (234/3)		
<b>Provision of the development plan to which the issue relates:</b>	Chapter 5: Promoting a Low Carbon Place	
<b>Planning authority's summary of the representation(s):</b>		
<p><u>James Bennett (234/3)</u></p> <ul style="list-style-type: none"> <li>The community adjacent to the Maidenhill Development has been subject to excessive noise levels in excess of 10 months due to rock breaking due to 'Platforming' of the site.</li> </ul>		
<b>Modifications sought by those submitting representations:</b>		
<p><u>James Bennett (234/3)</u></p> <ul style="list-style-type: none"> <li>Recommend that the Policy be supported by an Operational Standard that states that the boundary noise level at site perimeter be in compliance with current statutory guidance levels.</li> </ul>		
<b>Summary of responses (including reasons) by planning authority:</b>		
<p><u>James Bennett (234/3)</u></p> <ul style="list-style-type: none"> <li>It is considered that Policy E5- Noise Impacts – is sufficient, robust and flexible enough to be utilised in a range of settings, enabling assessment of noise levels for development proposals, as appropriate, and in accordance with current statutory guidance.</li> <li>The policy provides a basis for both requiring appropriate assessments to be undertaken, and whether appropriate mitigation measures can be put in place that reduce, control and mitigate the noise impact.</li> <li>Required information associated with Noise Assessments will be informed and guided by the Council's Protective Services, and would be expected to accord with nationally accepted standards and protocols.</li> <li>Complaints on noise are most appropriately addressed either by the Development Management planning enforcement route, where there is an appropriate condition attached to a planning consent or through standard statutory nuisance considerations as investigated by the Council's Protective Services, as directed by the Environmental Protection legislation.</li> <li><u>It is not proposed to modify the plan based upon the above.</u></li> </ul>		

<b>Reporter's conclusions:</b>
<b>Reporter's recommendations:</b>

<b>Issue 34</b>	<b>Water Environment and Flooding</b>	
<b>Development plan reference:</b>	Policy E7: Flooding Policy E8: Water Management Policy E9: Waste Water Treatment	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
James Bennett (234/5) Broom, Kirkhill and Mearnskirk Community Council (255/26) (255/27) Newton Mearns Flood Group (480/1) (480/4) (480/5) SEPA (492/6)		
<b>Provision of the development plan to which the issue relates:</b>	Chapter 5: Promoting a Low Carbon Place	
<b>Planning authority's summary of the representation(s):</b>		
<p><b><u>(a) Policy E7: Flooding</u></b></p> <p><b><u>Support</u></b></p> <p><u>SEPA (492/6)</u></p> <ul style="list-style-type: none"> <li>• Welcome the intention to take a precautionary approach to all flood sources and that avoidance will be the first principle in line with the SPP flood risk framework and the SEPA vulnerability guidance.</li> <li>• Support the requirement of a Flood Risk Assessment to identify appropriate land for development and to inform the use and design of projects.</li> <li>• Support the recognition that land raising should only be accepted in exceptional circumstances.</li> <li>• Welcome the reference to safeguarding the storage capacity of the functional floodplain.</li> </ul> <p><b><u>Objections</u></b></p> <p><u>James Bennett (234/5)</u></p> <ul style="list-style-type: none"> <li>• Sustainable Urban Drainage as per 'Sewers for Scotland'v4 is referred to. From an operational perspective it would be good practice for East Renfrewshire to set verification and performance standards for their Environmental Critical Elements and equipment. for example <a href="http://www.hse.gov.uk/offshore/ed-sce-management-and-verification.pdf">www.hse.gov.uk/offshore/ed-sce-management-and-verification.pdf</a></li> </ul> <p><u>Broom, Kirkhill and Mearnskirk Community Council (255/26)</u></p> <ul style="list-style-type: none"> <li>• Requests that future determination of Planning Applications take flooding matters into more detailed consideration than have been demonstrated in the past.</li> </ul>		

Newton Mearns Flood Group (480/1)

- Policy should be strengthened

**(b) Policy E8: Water Management**Newton Mearns Flood Group (480/4)

- Policy should be strengthened

**(c) Policy E9: Waste Water Treatment****Support**Broom, Kirkhill and Mearnskirk Community Council (255/27)

- Strongly endorse the policy and encourages the Council to incorporate requirements more coherently into future consideration.

**Objections**Newton Mearns Flood Group (480/5)

- Policy should be strengthened

**Modifications sought by those submitting representations:****(a) Policy E7: Flooding**James Bennett (234/5)

- From an operational perspective it would be good practice for East Renfrewshire to set verification and performance standards for their Environmental Critical Elements and equipment. for example [www.hse.gov.uk/offshore/ed-sce-management-and-verification.pdf](http://www.hse.gov.uk/offshore/ed-sce-management-and-verification.pdf)

**Summary of responses (including reasons) by planning authority:****(a) Policy E7: Flooding****Support**SEPA (492/6)

- The Council acknowledges and welcomes the support for Policy E7 given by SEPA, especially in relation to the precautionary approach to all flood sources and that avoidance will be the first principle in line with Scottish Planning Policy (SPP) (CD/@@) flood risk framework and SEPA vulnerability guidance, the requirement for Flood Risk Assessments to inform land for development and design of projects, and the prerequisite to avoid land raising and reference to safeguarding storage.

- It is not proposed to modify the policy based upon the above

### **Objections**

James Bennett (234/5), Broom, Kirkhill and Mearnskirk Community Council (255/26),  
Newton Mearns Flood Group (480/1)

- Policy E7- Flooding has been specifically modelled and derived from SPP and guidance provided by SEPA a key agency for water environment matters.
- The policy provides an appropriate, proportionate, strong and comprehensive policy guidance, in relation to flooding matters, from which development proposals can be designed and assessed against.
- In relation to the planning application committee the council is required, by the planning acts to assess development proposals, against the development plan and any other material considerations, relevant to each individual case without prejudice.
- There is a comprehensive range of legislation and guidance, utilised by a range of bodies, relevant within this field, ranging from local authorities, SEPA and Scottish Water.
- Each regulatory responsible body has specific parameters and standards which undertakers and operators are required to adhere to. It would be inappropriate to detail specific verification and performance standards as set out by other responsible regulatory bodies.
- It is not proposed to modify the policy based upon the above.

### **(b) Policy E8: Water Management**

Newton Mearns Flood Group (480/4)

- Policy E8: Water Management, provides an appropriate, proportionate, strong and comprehensive policy guidance, in relation to Water Management, from which development proposals can be designed and assessed against.
- It is not proposed to modify the policy based upon the above.

### **(c) Policy E9: Waste Water Treatment**

#### **Support**

Broom, Kirkhill and Mearnskirk Community Council (255/27)

- The Council acknowledges and welcomes the support for Policy E9.
- It is not proposed to modify the policy based upon the above

### **Objections**

Newton Mearns Flood Group (480/5)

- Policy E9: Waste Water Treatment, provides an appropriate, proportionate, strong and comprehensive policy guidance, in relation to Waste Water Treatment, and from which development proposals are required to follow, with only limited exceptions.

- It is not proposed to modify the policy based upon the above

**Reporter's conclusions:**

**Reporter's recommendations:**

<b>Issue 35</b>	<b>Vacant, Derelict and Contaminated Land</b>	
<b>Development plan reference:</b>	Policy E10: Vacant, Derelict and Contaminated Land	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
Woodland Trust Scotland (376/8) The Coal Authority (473/1)		
<b>Provision of the development plan to which the issue relates:</b>	Chapter 5: Promoting a Low Carbon Place	
<b>Planning authority's summary of the representation(s):</b>		
<p><b><u>Support</u></b></p> <p><u>Woodland Trust Scotland (376/8)</u></p> <ul style="list-style-type: none"> <li>The policy is welcomed in that it is recognised that some sites may contain biodiversity value. It must be acknowledged that some sites may be suited for more than just temporary greening.</li> </ul> <p><b><u>Objection</u></b></p> <p><u>The Coal Authority (473/1)</u></p> <ul style="list-style-type: none"> <li>Pleased to see the inclusion of the consideration of land instability.</li> <li>Recommend that this requirement is made more explicit in the wording of the policy.</li> </ul>		
<b>Modifications sought by those submitting representations:</b>		
<p><u>The Coal Authority (473/1)</u></p> <ul style="list-style-type: none"> <li>Para 1: Proposals will be required to optimise the remediation and redevelopment of vacant, derelict, <i>unstable</i> and contaminated land and buildings where appropriate.</li> <li>Para 2: Where contamination <i>or instability</i> of a development site is identified, applicants will be required to submit a contaminated land survey/<i>ground conditions report or Coal Mining Risk Assessment</i> alongside their application.....</li> </ul>		
<b>Summary of responses (including reasons) by planning authority:</b>		
<p><b><u>Support</u></b></p> <p><u>Woodland Trust Scotland (376/8)</u></p>		



- The Council acknowledges and welcomes the support for Policy E10.
- It is not proposed to modify the plan based upon the above.

### **Objection**

#### **The Coal Authority (473/1)**

- The Council acknowledges the recognition that there is inclusion of the consideration of land instability set out in this policy
- The representation further suggests that the policy wording in relation to ground instability be further emphasised and made explicit though inclusion of the term both in the title of the policy and a further direction be made within the policy to include the requirement for a 'ground condition report or Coal mining Risk assessment'. It is acknowledged that this factor is an essential element of standard site investigation process when development or redevelopment of a site is being considered through investigative studies.
- In this context it is considered that the existing policy framework provided by the plan is both appropriate and proportionate to enable ground instability issues to be investigated and addressed where appropriate when considering proposals for development.
- Strategic Policy 1 – Development Strategy – (criterion 1) confirms the Council's approach in relation to the regeneration, consolidation and environmental enhancement of the urban areas through the re-use of brownfield and vacant sites.
- Through the Development Management statutory consultation process issues of instability, will be appropriately considered.
- The Planning authority has a duty to ensure development is safe and fit for purpose for the proposed end use. To this end Strategic Policy 1 and Policy D1: Placemaking and Design, are comprehensive and robust in their provision of a range of considerations, including land instability. Therefore the Council is not minded to follow the coal authority's suggestions on this point.
- The Coal authority is a statutory consultee in historical coal mining areas. As such consideration of planning applications, within these areas, will address this factor to ensure that ground is stable and suitable for the proposed end use.
- It is not proposed to modify the Plan based upon the above.

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**

<b>Issue 36</b>	<b>Minerals</b>	
<b>Development plan reference:</b>	Policy E12: Minerals	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
The Coal Authority (473/2) Scottish Government (486/6)		
<b>Provision of the development plan to which the issue relates:</b>	Chapter 5: Promoting a Low Carbon Place	
<b>Planning authority's summary of the representation(s):</b>		
<p><u>The Coal Authority (473/2)</u></p> <ul style="list-style-type: none"> <li>• Pleased to see the policy sets out criteria against which proposal for mineral development can be assessed.</li> <li>• Consider that the inclusion of the first paragraph, which relates to issues arising from past coal mining legacy, i.e. land instability, is confusing and incongruous. This first element of the Minerals policy relates to past mining activity and the legacy left behind and not current or proposed mineral extraction and therefore including this in a criteria based 'assessment' policy may result in confusion for users of the plan.</li> <li>• Consider that it would be more appropriate to either separate the content of E12 into two policies, or alternatively make the content and policy considerations of E12 more explicit for readers.</li> </ul> <p><u>Scottish Government (486/6)</u></p> <ul style="list-style-type: none"> <li>• SPP policy 238 outlines the need for LDPs to maintain a landbank of permitted reserves for construction aggregates of at least 10 years at all times in all market areas through the identification of areas of search. This is an important requirement for LDPs, ensuring they have an adequate supply of minerals and help guide development to appropriate areas.</li> </ul>		
<b>Modifications sought by those submitting representations:</b>		
<p><u>The Coal Authority (473/2)</u></p> <ul style="list-style-type: none"> <li>• Option 1 – Split into two policies <ul style="list-style-type: none"> <li>○ Delete Para 1 from Policy E12.</li> </ul> </li> </ul>		

- Insert new Policy named E12A Legacy from Past Minerals Extraction. Insert Para 1 from Policy E12.

### **Policy E12: Minerals**

~~Proposals will be required to assess potential risks to new development from any unstable land resulting from past mining activity and where necessary provide appropriate mitigation measures or remediation strategies.~~

Proposal which would sterilise workable mineral resources which are of economic or conservation value will not be supported unless there are significant benefits which outweigh those of protecting the resources in future.

Proposal for new and/or extended mineral extraction will be required to demonstrate that there would be no significant negative impact, either individually or cumulatively, against the following criteria:

1. Disturbance, disruption and noise, blasting and vibration, and potential pollution of land, air and water;
2. Impacts on local communities, individual houses and the operation of other business;
3. Benefits to the local and national economy;
4. Cumulative impact with other mineral and landfill sites in the area;
5. Effects on natural heritage, habitats and the historic environment;
6. The green network including path and cycle networks;
7. Landscape and visual impacts, including cumulative effects;
8. Transport impacts; and
9. Restoration and aftercare (including any benefits in terms of the remediation of existing areas of dereliction or instability).

### **Policy E12A: Legacy from Past Minerals Extraction**

Proposals will be required to assess potential risks to new development from any unstable land resulting from past mining activity and where necessary provide appropriate mitigation measures or remediation strategies.

- Option 2 - Additional wording
  - Amend Policy to read Policy E12: Minerals and Land Instability.
  - Move Para 1 and add in 3<sup>rd</sup> Para

### **Policy E12: Minerals and Land Instability**

Proposal which would sterilise workable mineral resources which are of economic or conservation value will not be supported unless there are significant benefits which outweigh those of protecting the resources in future.

Proposal for new and/or extended mineral extraction will be required to demonstrate that there would be no significant negative impact, either individually or cumulatively, against the following criteria:

1. Disturbance, disruption and noise, blasting and vibration, and potential pollution of land, air and water;
2. Impacts on local communities, individual houses and the operation of other business;

3. Benefits to the local and national economy;
4. Cumulative impact with other mineral and landfill sites in the area;
5. Effects on natural heritage, habitats and the historic environment;
6. The green network including path and cycle networks;
7. Landscape and visual impacts, including cumulative effects;
8. Transport impacts; and
9. Restoration and aftercare (including any benefits in terms of the remediation of existing areas of dereliction or instability).

*On sites where past mining activity has been carried out resulting in a risk to surface stability:*

*Proposals will be required to assess potential risks to new development from any unstable land resulting from past mining activity and where necessary provide appropriate mitigation measures or remediation strategies.*

Scottish Government (486/6)

- The plan should include a policy to include a 10 year landbank for construction aggregates or area of search. Policy E12 does not include this as it currently stands. A new policy should be included to make this provision or Policy E12 should be amended to take account of this.

**Summary of responses (including reasons) by planning authority:**

The Coal Authority (473/1)

- The Council welcomes the acknowledgement that a Minerals Policy has been introduced within the plan, which sets out criteria against which proposals can be assessed.
- In relation to the Coal Authorities concerns that the policy lacks clarity in relation to past mining activity, and that it would be appropriate to either separate content (in relation to past mining activity) into either 2 distinct policies or amend policy to make it more explicit to readers, the council would respond as follows.
- The Council is of the opinion that the Policy is structured in a comprehensive and straightforward manner. The first paragraph of the policy sets out the requirement that potential risks to new development from any unstable land resulting from past mining activity are assessed, as necessary, and provision of appropriate mitigation and/or remediation strategies are provided.
- The second paragraph makes clear that proposals which would sterilise workable mineral resources, which are of economic or conservation value will not be supported.
- The elements of the policy, which would be considered relevant to each individual proposal would be applied and considered where appropriate. The policy is considered to make provision for the full range of potential development scenarios.
- The layout of the policy follows a similar design to the suite of policies provided within the plan. To separate the policy into 2 distinct minerals policies as outlined within the coal authority's (option 1) is considered inconsistent with the established policy style within the Proposed Plan.
- In relation to option 2, the council would contend that the existing first paragraph within the policy is straightforward, as it relates to unstable land from past mining activity. To add a sub-title under 'Minerals and Land Instability' adds an

unnecessary and inconsistent additional element to the policy. Given the comments above to Council considers Policy E12 to be appropriate in its current form.

- It is not proposed to modify the plan based upon the above.

#### Scottish Government (486/6)

- Within East Renfrewshire, the SPP requirements in relation to minerals, have been addressed by a combination of Clydeplan (CD/@@) and the LDP, which make up the development plan.
- The issue of minerals was previously considering at the examination of LDP1. A modification was proposed by the Reporter (pages 16 to 19 of Examination Report) (CD/@@) recommending the inclusion of a specific policy covering minerals. Clydeplan (2017) was also considered at examination in relation to Minerals.
- Clydeplan provides the strategic element of the development plan pertinent to minerals. East Renfrewshire is one of the constituent Clydeplan local authorities. Clydeplan, Policy 15 – (Mineral Resources Spatial Framework) states that an adequate and steady supply of materials will be maintained, including construction aggregates equivalent to at least 10 years extraction and that supplementary guidance will set out how this is to be achieved. To date the Clydeplan SPG has not been progressed on this matter.
- Clydeplan is also supported by a series of Background Reports. Background Report 13 covers the situation in relation to minerals. Rather than identify areas of search the whole Clydeplan area was treated as an area of search, confirming that any future mineral development proposals should be considered in the context of Policy 15, the associated background report and diagram 10 – Assessment of Proposals.
- Clydeplan and Policy E12 of the Proposed Plan closely align with Scottish Planning Policy (SPP) (CD/@@) (para 236,237 and 238) and provide comprehensive development plan policy guidance, including criteria based policies.
- Given these considerations the Council considers that the combination of Clydeplan and LDP2 provide an appropriate policy framework from which to guide and assess development proposals.
- It is not proposed to modify the plan based.

#### **Reporter's conclusions:**

#### **Reporter's recommendations:**

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