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Mr R Greenwood
East Renfrewshire Council
Sent By E-mail

Our ref: LDP-220-3

12 August 2021

Dear Richard Greenwood

**PROPOSED EAST RENFREWSHIRE LOCAL DEVELOPMENT PLAN 2
THE TOWN AND COUNTRY PLANNING (DEVELOPMENT PLANNING) (SCOTLAND)
REGULATIONS 2008**

SUBMISSION OF THE REPORT OF THE EXAMINATION

We refer to our appointment by the Scottish Ministers to conduct the examination of the above proposed plan. Having satisfied ourselves that the planning authority's consultation and engagement exercises conformed with their participation statement our examination of the proposed plan commenced on 19 November 2020. We have completed the examination and now submit our report.

In our examination we considered all 36 issues arising from unresolved representations identified by yourselves to the proposed plan. In each case we have taken account of the original representations, as well as your summaries of the representations and your responses to such, and we have set out our conclusions and recommendations in relation to each issue in our report.

The examination process included a comprehensive series of unaccompanied site inspections and, for some issues, we requested additional information from yourselves and other parties. We did not require to hold any hearing or inquiry sessions.

Subject to the limited exceptions as set out in Section 19 of the Town and Country Planning (Scotland) Act 1997 (as amended) and in the Town and Country Planning (Grounds for Declining to Follow Recommendations) (Scotland) Regulations 2009, you are now required to make the modifications to the plan as set out in our recommendations.

You should also make any consequential modifications to the text or maps which arise from these modifications. Separately, you will require to make any necessary adjustments to the final environmental report and to the report on the appropriate assessment of the plan.



All those who submitted representations will be informed that the examination has been completed and that the report has been submitted to yourselves. We will advise them that the report is now available to view at the DPEA website at:

<https://www.dpea.scotland.gov.uk/CaseDetails.aspx?id=121161>

and that it will also be posted on your website at:

<http://www.eastrenfrewshire.gov.uk/ldp2>

The documents relating to the examination should be retained on your website for a period of six weeks following the adoption of the plan by yourselves.

It would also be helpful to know when the plan has been adopted and we would appreciate being sent confirmation of this in due course.

Yours sincerely,

J Alasdair Edwards
Reporter

Alison Kirkwood
Reporter

Malcolm Mahony
Reporter

Gordon S Reid
Reporter

REPORT TO EAST RENFREWSHIRE COUNCIL

**PROPOSED EAST RENFREWSHIRE DEVELOPMENT PLAN 2
EXAMINATION**

Reporters: J Alasdair Edwards MA(Hons) MRTPI
Alison Kirkwood BSc(Hons) MRTPI
Malcolm Mahony BA(Hons) MRTPI
Gordon S Reid BSc(Hons) MRTPI

Date of Report: 12 August 2021

CONTENTS

Page No

Preliminary Matter	1
Examination of Conformity with Participation Statement	2

Issue

1	General	4
2	Development Strategy	18
3	Development Contributions	32
4	City Deal	40
5	Areas for Change	46
6	Braidbar Quarry	54
7	Placemaking and Design	122
8	Green Belt	130
9	Green Infrastructure	141
10	Greenspace and Open Space	145
11	Natural Environment	149
12	Sustainable Transport Networks and Access	155
13	Community and Education Facilities and Infrastructure	176
14	Housing Supply, Delivery and Phasing	203
15	Housing Supply Barrhead	236
16	Housing Supply Busby	240
17	Housing Supply Giffnock	243
18	Housing Supply Neilston	249
19	Housing Supply Newton Mearns	277
20	Submitted Housing Supply Barrhead	292
21	Submitted Housing Supply Busby	303
22	Submitted Housing Supply Clarkston	315
23	Submitted Housing Supply Eaglesham	321
24	Submitted Housing Supply Newton Mearns	327
25	Submitted Housing Supply Neilston	357
26	Submitted Housing Supply Uplawmoor	363
27	Submitted Housing Supply Waterfoot	367

28	Housing Mix and Affordable Housing	377
29	Economic Development	385
30	Town & Neighbourhood Centres	391
31	Sustainable Design	394
32	Renewable Energy	403
33	Soil and Noise	414
34	Water Environment and Flooding	417
35	Vacant Derelict and Contaminated Land	422
36	Minerals	426

Preliminary matter

As set out in Issue 14 a recent court judgement – *Graham’s the family dairy (property) and Mactaggart and Mickel Homes Limited v the Scottish Ministers [2021] COSH74* – was submitted late in the examination proceedings. Subject to any further legal process the revised version of Scottish Planning Policy (2020) and the accompanying Planning Advice Note 1/2020 are now quashed. Consequently, references in this report apply to Scottish Planning Policy (2014). The representations to this plan were submitted in that context. Further written submissions, in the course of the examination, addressed the 2020 update in relation to housing matters. However, the conclusions of this report, in so far as they specifically reference Scottish Planning Policy, would apply in either context.

Examination of conformity with the participation statement

1. Section 19(4) of the Town and Country Planning (Scotland) Act 1997 (as amended) firstly requires an examination by the appointed person (reporter) of whether the planning authority has consulted on the proposed local development plan and involved the public in the way it said it would in its participation statement.
2. Section 20B of the Act requires each planning authority to prepare a development plan scheme at least annually. The scheme should set out the authority's programme for preparing and reviewing its development plan, and must include a participation statement. This publication should state when, how and with whom consultation on the plan will take place, and the authority's proposals for public involvement in the plan preparation process.
3. Scottish Government Circular 6/2013 on Development Planning states that "The Act restricts the Examination to the actions of the authority concerning consultation and public engagement in respect of the Proposed Plan, rather than the extended plan preparation process. In carrying out this assessment, Scottish Ministers envisage that the reporter will only refer to existing published documents such as the Participation Statement itself, the authority's statement of conformity with this, and any representations relating to the authority's consultation and public involvement activities".

The participation statement

4. The proposed East Renfrewshire Local Development Plan 2 (LDP) was placed on public deposit for eight weeks between 21 October 2018 and 13 December 2019. During this period the East Renfrewshire LDP 2 Development Plan Scheme May 2019 was current.
5. With respect to the proposed plan the scheme promoted the minimum statutory requirements of public notification; sending a copy of the proposed plan, proposed action programme and environmental report to the Scottish Government; notifying key agencies, neighbouring planning authorities, those in the same strategic development plan area and community councils of the plan's publication; depositing documents at council offices and local libraries (as well as publishing on the council's website); and notifying owners/occupiers and neighbours of proposed sites as well as those who commented on the main issues report.
6. Additionally, the scheme suggested further consultation methods including: notification of all stakeholders on its LDP consultee database; drop-in sessions; using social networking sites; press releases; information leaflets, posters and displays; an online storymap; and online engagement forms.

The report of conformity

7. Together with the proposed plan, section 18(4)(a)(i) of the Act requires an authority to submit a report to Scottish Ministers demonstrating the extent that the authority has met the needs of section 19(4). East Renfrewshire Council has submitted a 'Report of Conformity with Participation Statement' (June 2020).
8. The report confirms that the consultation period ran from October to December 2019 during which a total of 568 representations were received to the proposed plan. The

report provides evidence that the minimum statutory requirements were met including notification to 932 owners/occupiers and neighbours of proposed sites and 692 letters and emails to parties who commented at the main issues report stage.

9. In addition, the report confirms that the planning authority notified 326 stakeholders; sent hard copies of the proposed plan to each community council; organised six drop-in events; conducted three workshops with primary and secondary school pupil councils; used Facebook and Twitter to provide up-to-date information on the plan and events; released notices on the council home page and news stories in the Barrhead News and Scottish Housing News; provided an interactive online storymap of the proposed plan; provided various online and hard-copy options to make representations; placed posters in all libraries and 12 other public locations throughout the council area; set up pop-up displays in several locations; engaged with internal council departments; provided a summary version of the proposed plan for ease of access; and gave a presentation to the East Renfrewshire Culture and Leisure Trust Board.

Conclusions

10. East Renfrewshire Council has successfully published and promoted the proposed plan giving more than the minimum period for representations required by statute. The planning authority has met the statutory obligations in relation to the period for representations, neighbour notification and newspaper notification.

11. No representations submitted to the examination suggest that the planning authority has not conformed with its participation statement. However, some representations raise concerns regarding consultation (as set out in Issue 1 - General). I have summarised the concerns below together with the actions of the council.

- Representations suggest that: the local development plan process is based on outdated rules; there was a lack of awareness of the process and a lack of information available; that Neilston Community Council was “in limbo” meaning that there was a lack of opportunity for a meaningful community response; and that the consultation was carried out during the general election period. In response, the planning authority confirms that each stage of the process was approved by councillors and subject to consultation exceeding the statutory requirements including engagement with communities and key agencies. The complexity of the process is noted but the aim was to make engagement as user-friendly, easy to interpret and accessible as possible.

12. Having considered all the evidence, I find that the planning authority has consulted on the proposed plan and involved the public in the way it said it would in its participation statement. Being satisfied, the examination of the proposed plan can commence.

J Alasdair Edwards

Reporter

Issue 1	General	
Development plan reference:	Section 1: Introduction	Reporter: Alasdair Edwards
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Scottish Natural Heritage (178/1) (178/13) (178/15) Ian Davidson (210/1) (210/3) James Bennett (234/1) (234/2) (234/4) Broom, Kirkhill and Mearnskirk Community Council (255/1) Woodland Trust Scotland (376/9) Sean Deakin (402/1) Mairead Fernandez McCann (407/3) (407/4) (407/5) (407/6) 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>		
Provision of The development plan to which the issue relates:	<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"> • Site Evaluation • Strategic Environmental Assessment • Equalities and Human Rights Impact Assessment • Action Programme • Background Reports 	
Planning authority's summary of the representation(s):		
<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><u>Introduction</u></p> <p><u>Support</u></p> <p><u>Broom, Kirkhill and Mearnskirk Community Council (255/1)</u></p> <ul style="list-style-type: none"> • Support the concepts expressed within the Introduction and the strong correlation with the recent policy statements expressed by the Scottish 		

Government.

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.
- Lack of awareness of LDP process.
- 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 (376/9)

- 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

Scottish Natural Heritage (178/13)

- Clarification could be provided on the scoring system. Recommend clarifying the scoring to ensure that negative and positive impacts on natural heritage are taken into consideration.

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

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

SNH (501/1)

- Content that the SEA provides a comprehensive assessment
- Recommends changes to two polices (mitigation and monitoring) to more accurately represent the potential environmental impacts.
- 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 policies listed above
- Monitoring Strategy: set out specific indicators relating to the SEA Objectives which could be displayed in simple table

Historic Scotland (482/1) (501/2)

- Generally content with SEA
- 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.
- 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.

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

Scottish Natural Heritage (178/15)

- Welcome identification as partners for a number of actions.
- Happy to provide advice where relevant, including the preparation of Supplementary Guidance.

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 (376/9)

- 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 Mearnskirik 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 Screening Appraisal document (CD/53).
- The Council agrees with the suggested text and amendments proposed by SNH 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. 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' 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.*
- 2nd 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-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/69) and Scottish Planning Policy (SPP) (CD/68) and regional guidance in Clydeplan (SDP) (CD/80). 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/72) 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 Development Plan Scheme (DPS) (2019) (CD/39) 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 with the Participation Statement (CD/40) (Table 2) 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 (376/9)

- 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). The current 8 Clydeplan Local Authorities have continued to work together to prepare the first indicative RSS. East Renfrewshire Council will continue to play an active role in the preparation and alignment of a future RSS and Regional Economic Strategy for the Glasgow City region. 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 Site Evaluation based upon the above.

Objections

Scottish Natural Heritage (178/13), James Bennett (234/4), Mairead Fernandez McCann (407/5)

- Representations objected to the scoring and findings of the Site Evaluation (CD/34) and Strategic Environmental Assessment (SEA) (CD/33).
- 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 Site Evaluation based upon the above.

Strategic Environmental Assessment

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

- 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 and site assessments 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 and influence 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 Equalities and Human Rights Impact Assessment based upon the above.

Action Programme

Scottish Natural Heritage (178/15), 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 Action Programme 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 Background Reports based upon the above.

Reporter’s conclusions:

1. The support from the Broom, Kirkhill and Mearnskirk Community Council is noted but requires no examination.

Habitats regulations

2. The council has determined that the proposed East Renfrewshire Local Development Plan 2 is unlikely to have a significant effect on any European Sites within its boundary or elsewhere. This determination was undertaken in separate documentation to the proposed plan but nevertheless should be referred, as directed by Scottish Natural Heritage (now NatureScot), within the plan. Consequently, I agree that the additional wording referring to the screening process (as proposed by the council but with minor edits for clarity) should be included in the proposed plan.

3. The term “European Sites” is now commonly used to refer to what were previously called “Natura sites”. Furthermore, the habitats regulations were recently amended in Scotland in 2019 following the United Kingdom leaving the European Union. Consequently, the Habitats Directive is translated into legal obligations by the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended). Therefore, I agree with NatureScot that the proposed plan should refer to “Habitat Regulations” instead of “Habitats Directive”.

Consultation and LDP process

4. The unresolved issues raised by parties do not request any changes to the proposed plan but refer to the consultation process and availability of documentation. As identified in the ‘examination of conformity with the participation statement’ at the beginning of this report, the council has consulted in the way it said it would exceeding the minimum statutory period and aiming to ensure ease of participation. In addition, the supporting documentation and the council’s risk management strategy are available online. No changes to the proposed plan are necessary to respond to these matters.

Climate emergency

5. An outcome stated in Scottish Government publication ‘Scottish Planning Policy’ is to achieve a low carbon place “reducing our carbon emissions and adapting to climate change”. This national policy document also includes information and stipulations on how plans and proposals can respond to climate change. Clydeplan (the Glasgow and

Clyde Valley Strategic Development Plan, approved 2017) refers to the Scottish Government's commitment to a low carbon economy and reducing emissions through climate change adaptation as embodied in legislation. This plan also includes a policy (policy 10) on heat mapping, renewable heat and onshore wind to respond to climate change matters. In support of these provisions, the proposed East Renfrewshire Local Development Plan 2 includes a section on 'sustainable development and tackling climate change' which refers to legislative requirements and provides a response to climate change challenges at a local level. I agree with Ian Davidson that the proposed plan does not specifically refer to the term "climate emergency" but the plan does reasonably respond to the challenges arising from such an emergency without the need to include this term. No change to the proposed plan is required to respond to this matter.

Glossary

6. Within the proposed plan, policy D7 (natural environment features) states that the loss of ancient woodland will not be supported. The supporting text to the policy explains that ancient woodland is an irreplaceable resource which should be protected. Schedules within the proposed plan also refer to pockets of ancient woodland within sites. However, there is no definition within the proposed plan of "ancient woodland". No definition is provided within Clydeplan (part of the development plan for the area) or within Scottish Planning Policy. Therefore, I agree with the Woodland Trust Scotland that inclusion of a definition within the proposed plan would be reasonable as recommended below. I note that this change is supported by the council.

Policy context

7. I agree with Scottish Power Renewables that the recently enacted Planning (Scotland) Act 2019 has introduced a suite of changes to the planning system in Scotland. I further agree with this representee that some mention of the forthcoming National Planning Framework 4 should be made in the national policy section of the proposed plan to set the context. However, I do not consider it would be reasonable to set an expectation within the proposed plan that the publication of the National Planning Framework 4 would immediately trigger a review of the local development plan as interpretation of the wording supplied by Scottish Power Renewables would indicate. In addition, while net zero and the climate emergency might be key features of the new National Planning Framework the exact referencing and terms for local development plans are yet to be known. Consequently, I consider it appropriate for the proposed plan to simply indicate that a new National Planning Framework is forthcoming and would form part of the development plan in the future.

8. The text supplied by the council to update the national policy situation is reasonable and generally aligns with that given by Scottish Power Renewables. However, I understand that while the National Planning Framework 4 will incorporate Scottish Planning Policy that is not, as could be interpreted from the wording provided by the council, a requirement introduced by the Planning (Scotland) Act 2019. Furthermore, while Regional Spatial Strategies are introduced by this Act, with a duty on planning authorities to have regard to them in preparing local development plans, these strategies will not form part of the development plan as strategic development plans currently do. The wording provided by the council suggests Clydeplan would be directly replaced by a regional spatial strategy which could be interpreted as it forming part of the development plan. In addition, the wording suggests that the council will review and

monitor changes in the preparation of the proposed plan but the stage following examination is to adopt the plan and therefore it will no longer be under preparation. To respond to these points, I have recommended insertion of the council's wording but with a few minor changes.

Supporting documents

9. This examination is concerned with unresolved issues related to the proposed East Renfrewshire Local Development Plan 2. Therefore, I have no remit to respond to the support and objections to provisions contained within the site evaluation documentation, strategic environmental assessment, equalities and human rights impact assessment, action programme and other background reports.

Reporter's recommendations:

Modify the proposed plan by:

1. Replacing the heading and section entitled "Habitats Directive" on page 11 with:

"Habitats Regulations

A Habitats Regulations Appraisal (HRA) determines whether a plan or project should be subject to appraisal. The screening stage of the HRA 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 European Sites located outwith the East Renfrewshire area which are likely to be affected by the strategies, policies or proposals in the Plan. As a result a HRA is not required.

Any future proposals or changes to the Plan which have the potential to have an adverse effect on the integrity of any European Sites will be subject to a HRA in accordance with the Habitats Regulations."

2. Inserting a definition for "Ancient Woodland" after "Amenity" in the Glossary on page 139 as follows:

"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 Ordnance Survey 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."

3. Inserting a second sentence in the first paragraph under the heading "National Planning Framework 3" on page 14 as follows:

"A revised National Planning Framework will be published within the lifetime of this plan and will form part of the development plan."

4. Replacing the final paragraph on page 14 with the following:

“The Planning (Scotland) Act 2019 introduces a significant number of changes to legislation, spatial planning and development management processes. As part of planning reform Scottish Planning Policy will be incorporated into the National Planning Framework. The requirement to produce Strategic Development Plans will be removed and Regional Spatial Strategies are to be introduced to provide long-term spatial strategies for regions. The Council will continue to monitor the progress with this review and emerging national policies and objectives responding where necessary.”.

5. Introducing a final paragraph in the section entitled “Clydeplan” on page 15 as follows:

“The implementation of the Planning (Scotland) Act 2019 means that Clydeplan will not be reviewed. However, a Regional Spatial Strategy (RSS) providing a long-term spatial strategy for the region covering East Renfrewshire will be produced which the Council will monitor and respond to as necessary. The current 8 Clydeplan local authorities have continued to work together to prepare the first indicative RSS. East Renfrewshire Council will continue to play an active role in the preparation and alignment of a future RSS and Regional Economic Strategy for the Glasgow City region.”.

Issue 2	Development Strategy	
Development plan reference:	Development Strategy	Reporter: Alasdair Edwards
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>James Whyteside (22/2) 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) NHS Greater Glasgow (500/1) Gladman Developments Ltd (503/5),(571/7) Avant Homes (504/10) Lynch Homes (505/4)</p>		
Provision of the development plan to which the issue relates:	Section 2: Managing and Enabling Growth Development Strategy Spatial Objectives Strategic Policy 1: Development Strategy	
Planning authority's summary of the representation(s):		
<p><u>Support</u></p> <p><u>GoBike (174/1)</u></p> <ul style="list-style-type: none"> • 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. <p><u>Scottish Natural Heritage (178/2)</u></p> <ul style="list-style-type: none"> • Welcome that our advice from the draft Proposed Plan stage has been incorporated into the Plan on topics such as the natural environment, green 		

infrastructure, sustainable locations, active travel, landscape character and setting, and the town centre first principle.

- Welcome the promotion of sustainable development through “focusing future development on sustainable locations; safeguarding and maintaining the green belt and countryside; and by making efficient use of land and buildings in urban areas”. The emphasis given to placemaking, the green network, active travel and health is strongly supported.
- The commitment to a master planned approach for Strategic Development opportunities is welcomed, particularly as some of the sites such as Barrhead South, have local natural heritage sensitivities.
- Note that “there is a sufficient land supply to meet the Housing Land Requirement of Clydeplan by 2029” and that no further housing sites are identified for release in the Proposed Plan. The preference for development of brownfield sites in urban areas over greenfield sites is strongly supported. Welcome the requirement for development to be of an appropriate scale and character for the specific settlement and local area.

Woodland Trust Scotland (376/1)

- 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.

Aldi Stores (474/4)

- 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

James Whyteside (22/2)

- Objects to further housing development around Newton Mearns.

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.
- Understand that concern over education capacity has played a part in the decision not to allocate new housing sites. Homes for Scotland is willing to work collaboratively with ERC to seek solutions to any issues arising, but we consider further information is required to fully understand the issue.
- New housing has been part of the solution to providing new infrastructure under the current LDP and can continue to be if the proposed LDP is modified. It would represent a missed opportunity if the Proposed LDP did not take the opportunity to address both affordability and infrastructure in a comprehensive and potentially phased approach.

Scottish Power Renewables (496/3)

- In Spatial Objective 3 the LDP2 should emphasise net zero targets to ensure alignment with renewable energy objectives.
- Strategic policy 1 should acknowledge climate change.

Gladman Developments Ltd (503/5) (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 (503/5) (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), Scottish Natural Heritage (178/2), Woodland Trust Scotland (376/1), Aldi Stores (474/4), Historic Environment Scotland (482/2), Scottish Power Renewables (496/3), NHS Greater Glasgow (500/1)

- The Council acknowledges and welcomes the supporting comments in relation to the strategy of the Plan and the spatial objectives. 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

Objections

James Whyteside (22/2), 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 (503/5) (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/68) 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 Local Development Plan (LDP1) (CD/01) and started the preparation of LDP2 in October 2016 with the publication of the Main Issues Report (MIR) (CD/20) 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/80). 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/28) and other Council Reports. A detailed response on this matter is provided under Issue 13.
- 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. However, the Council 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 resulting in a change of strategic approach than that recommended at MIR stage. 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 in line with Option 2B of the MIR. 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 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 the Green Belt Landscape Character Assessment (CD/42a) (CD/42b), the Green Belt Landscape Character Assessment Background Report (BR2) (CD/26) 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/34) 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 its supporting SPG) (CD/06) and at Barrhead South (Policy M2.2 and its supporting SPG) (CD/08) and a major regeneration proposal at Barrhead North, Glasgow Road/Shanks Park (Policy M3 and its supporting SPG) (CD/07).
- The Strategic Development Opportunities are delivering 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 are 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 mixed use 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.
- Energy reduction and climate change are also fully reflected under Para 4 of the supporting text on page 23 and within Point 12 of Strategic Policy 1.
- 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) 1st 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:

1. The support from parties on various matters, as outlined in the summaries above, is noted but these raise no unresolved issues requiring examination.

Development strategy

2. The proposed East Renfrewshire Local Development Plan 2 will, when adopted, form part of the development plan alongside Clydeplan (the strategic development plan for Glasgow and the Clyde Valley, 2017). Through law, the proposed plan should be consistent with the provisions of the higher tiered strategic development plan. As explained in Issue 14 (housing supply, delivery and phasing), Clydeplan sets a housing land requirement to be delivered in the period to 2029. In addition, the proposed plan must also, to accord with Scottish Government publication 'Scottish Planning Policy', make provision for housing up to year 10 post adoption – 2031 in this case. The need to meet the housing land requirement necessitates the identification of land for housing, including greenfield sites. However, no new housing allocations are made through the proposed plan as sites allocated in the adopted East Renfrewshire Local Development Plan (2015), carried through into the proposed plan, are sufficient to meet the housing land requirement. Therefore, while there is a need for housing land, including on greenfield sites, to meet the housing land requirement there is no justification for additional housing to be allocated over that identified.

3. The council's main issues report, which preceded publication of the proposed plan, presented a preferred strategy of 'consolidation, regeneration and controlled edge of settlement growth'. The purpose of a main issues report is to facilitate and inform the preparation of the proposed local development plan with engagement at an early stage in plan preparation. Scottish Government planning circular 6/2013 on 'development

planning' states that "the MIR [main issues report] should identify the planning authority's preferred options but it also needs to consider reasonable alternatives, where these are available"; and that "consultation on the Main Issues Report should come before the planning authority has reached a firm view as to the strategy". The council's main issues report provided a reasonable alternative to the preferred strategy of 'consolidation and regeneration' which it then adopted as its "settled view" through the proposed plan. The council is not bound to follow a preferred strategy and can, based on the evidence, proceed with a reasonable alternative. In this case, I find that the fact that the housing land requirement can be met from existing housing allocations means that adopting an approach of consolidation and regeneration (following, as identified in my conclusions in Issue 14, the 'compact city' model of Clydeplan) is reasonable and appropriate.

4. The council confirms in its responses to this Issue and to Issues 3 (development contributions), 13 (community and education facilities and infrastructure) and 14 (housing supply, delivery and phasing), that there is sufficient education capacity to accommodate allocated housing sites and those coming forward as windfall. In addition, the requirements of proposed local development plan strategic policy 1 (development strategy) and strategic policy 2 (development contributions) would ensure the efficient use of existing infrastructure and provision of required infrastructure where justified, including schools, healthcare, community facilities and roads. Consequently, I find that there is no known barrier to the delivery of allocated housing sites in relation to infrastructure provision.

5. The above conclusion is not true of additional housing beyond that allocated to meet the housing land requirement, as education constraints could, at present, impose a direct constraint. I find that the wording of proposed strategic policy 1 (development strategy) is reasonable in requiring windfall housing to provide required infrastructure and restricting windfall where impacts of residential development on education could not be overcome. This stance means that existing allocated housing to meet the housing land requirement can be accommodated, while allowing for additional windfall housing only in the circumstances where there is sufficient infrastructure provision. In these circumstances, "pockets" of housing in unconstrained areas (as referred to by Cala Homes) could come forward where in compliance with other development plan provisions. This matter is further addressed in Issue 13 below.

6. I consider the unresolved issues relating to the provision of additional housing land to address matters of affordability, range and choice of housing, placemaking and creation of sustainable mixed communities alongside the matter of supporting sustainable economic growth in Issue 14.

7. In response to the representation from James Whyteside, matters concerning allocated and promoted sites for housing in and around Newton Mearns are addressed in Issue 19 (housing supply – Newton Mearns) and Issue 24 (submitted housing supply – Newton Mearns). Furthermore, the site promoted by Gladman Development Limited at Waterfoot is dealt with in Issue 27 (submitted housing supply - Waterfoot).

8. Following my conclusions above, and in other referenced Issues contained within this report, I find that there is no need to amend the development strategy and that the focus on the delivery of the housing land requirement, with continued emphasis on consolidation and regeneration, is reasonable and appropriate. There is no need to release further land for housing or to modify the proposed plan's position in relation to education constraints.

9. Turning to climate change references, spatial objective 3.3 of the proposed plan (promotion of a low carbon place) seeks “to achieve the area’s full potential for electricity and heat from renewable sources, in line with national climate change targets”. In addition, the supporting text to proposed strategic policy 1 states that a challenge is “building resilience to manage the effects of climate change to ensure a better quality of life for future generations”. Criterion 12 of strategic policy 1 refers to the contribution to energy reduction and sustainable development, referencing the provisions of proposed policy E1 (sustainable design) and E2 (renewable energy) contained in the section entitled ‘a low carbon place’ where tackling climate change and adaptation to climate change are emphasised. The proposed plan should be read a whole. I find that the provisions within strategic policy 1 and its supporting text sufficiently refer to climate change and give appropriate referencing to other policy provisions related to climate change. Consequently, I find that there is no need for spatial policy 1 to acknowledge climate change as requested by Scottish Power Renewables.

Greenspace

10. As identified in paragraph 2 above, the need to meet the housing land requirement necessitates the loss of some greenspace for housing. However, the development strategy is one of consolidation and regeneration with no new additional housing on greenspace over that previously allocated. In addition, as referred in the council’s response above, there is sufficient provision in the proposed plan to ensure the protection of greenspace not allocated for development. I consider that the loss of greenspace to accommodate the housing land requirement is appropriate. Furthermore, new developments are required (through the provisions of the development plan) to accord with placemaking principles, ensure sufficient infrastructure provision and protect, integrate and enhance greenspace and green/blue networks. These provisions should be sufficient to provide thriving, attractive sustainable communities as envisaged in the proposed plan.

Healthcare

11. The vision for Clydeplan aims for “enterprising communities that reduce inequalities and support high levels of personal health and wellbeing”. This aim is also mirrored in the proposed local development plan with strategic objectives seeking the creation of sustainable places and communities where healthy lifestyles and wellbeing are supported; and the safeguarding and provision of community and healthcare facilities.

12. Furthermore, strategic policy 1 of the proposed plan seeks to ensure the phased release of sites to make efficient use of existing infrastructure and ensure coordinated delivery of community, health and care facilities. As recommended through Issue 3 (developer contributions), proposed strategic policy 2 (development contributions) also provides a mechanism to seek appropriate contributions towards healthcare. In addition, the proposed plan includes a section entitled ‘community facilities and infrastructure’ which highlights the importance of healthcare and access to outdoor recreation, community and leisure facilities to improve quality of life and mental health. The section also includes policy D4 (green networks and infrastructure) which promotes the use of outdoor space to contribute to healthy lifestyles and wellbeing; and policy D12 (community and education facilities and infrastructure) which seeks to protect and enhance facilities, including healthcare.

13. I find that there is sufficient provision in the proposed plan related to healthcare

infrastructure without the need to include a stand-alone section for this important matter.

Green network

14. Policy D4 in the proposed plan seeks the protection, promotion and enhancement of green networks across the council area. To reflect this position, I agree with Scottish Natural Heritage (now NatureScot) that the development strategy text on page 25 of the proposed plan should be modified to include reference to “enhancement”.

Key diagram

15. The Town and Country Planning (Scotland) Act 1997 (as amended) requires local development plans to contain “(a) such maps, diagrams, illustrations and descriptive matter as may be prescribed, and (b) such other diagrams, illustrations and descriptive matter (if any) as the planning authority think appropriate”. The Town and Country Planning (Development Planning) (Scotland) Regulations 2008 state that “a local development plan is to contain a map or maps, (to be known as “the Proposals Map”), describing the policies and proposals set out in the local development plan, so far as practicable to illustrate such policies or proposals spatially”.

16. Green networks and green network projects (as well as environmental projects) are distinguished as practically as possible on the proposals maps of the proposed local development plan (with accompanying descriptions in schedules contained within the proposed plan). This approach aligns with that required by statute and regulation. The key diagram, illustrated in figure 6 of the proposed plan on page 27, is at too small a scale to provide the same level of distinction. I agree with the council that the key diagram is indicative and provides a broad indication of the spatial strategy. Consequently, I find no need for the key diagram to provide further distinction of the green network as promoted by NatureScot.

Spatial objectives

17. The Climate Change (Emissions Reduction Targets) Act 2019 sets targets to reduce Scotland’s emissions of all greenhouse gases to net-zero by 2045, with interim targets which fall within the plan period to 2031. Consequently, I agree with the council and Scottish Power Renewables that the proposed plan should refer to net zero within its spatial objectives. While the council has identified changes I recommend an additional consequential change to the supporting text on page 23 in relation to the proposed plan’s objectives.

Reporter’s recommendations:

Modify the proposed local development plan by:

1. Inserting the text “, enhanced” between “connected” and “and provided in new developments” in the section referring to green networks on page 25.

[Note: The text should read “...green corridors are protected, connected, enhanced and provided in new developments.”.]

2. Replacing “low” with “net zero” in the title of spatial objective “3. Promoting a Low Carbon Place” on page 21.

3. Replacing “low carbon” with “net zero” in spatial objective 3.2 on page 21.
4. Inserting “/zero” after “low” in spatial objective 3.4 on page 21.
5. Replacing “low” with “net zero” in the objective “3. Promoting a Low Carbon Place” on page 23.

Issue 3	Development Contributions	
Development plan reference:	Strategic Policy 2: Development Contributions	Reporter: Malcolm Mahony
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>East Renfrewshire Council Education Department (170/2) Scottish Natural Heritage (178/13) Network Rail (475/4) Homes for Scotland (476/7) Robertson Homes (495/3) Scottish Government (486/10) NHS Greater Glasgow (500/2)</p>		
Provision of the development plan to which the issue relates:	Section 2: Managing and Enabling Growth	
Planning authority's summary of the representation(s):		
<p><u>Support</u></p> <p><u>East Renfrewshire Council Education Department (170/2)</u></p> <ul style="list-style-type: none"> • 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. <p><u>Scottish Natural Heritage (178/13)</u></p> <ul style="list-style-type: none"> • Support the intention to have “Multi-agency partnership and collaborative working with Key Agencies”. • Pleased that active travel has been incorporated into this policy. The inclusion of parks and open space, and green infrastructure is also strongly supported. <p><u>Network Rail (475/4)</u></p> <ul style="list-style-type: none"> • Network Rail welcomes the approach of LDP2 and the commitment to developer contributions for a range of infrastructure provision, services or facilities. <p><u>Objections</u></p> <p><u>Network Rail (475/4)</u></p> <ul style="list-style-type: none"> • 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.

- 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.

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

- Homes for Scotland does not believe that any burden should be placed on the developer through a developer obligation to contribute wholly or proportionately 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), Scottish Natural Heritage (178/13), 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/10), 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 1000m2. 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/71).

- 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/68) 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/77), 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/01). 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:

Supporting representations

1. The general support for aspects of strategic policy 2 (development contributions) of the proposed East Renfrewshire Local Development Plan 2 is noted but requires no examination.

Rail infrastructure

2. The wording of strategic policy 2 uses the phrase “roads and transportation”. As the council states this would include rail transport which is apparent in the council’s current ‘Development Contributions’ Supplementary Guidance (2015). However, by singling out roads, rather than leaving this as also covered by the term “transportation”, the phrase could be confusing. I therefore consider that the council’s suggested modifications to the policy and to the supporting text would remove any doubt on that score and should be incorporated in the interest of clarity.

3. Network Rail argues that, as an arm-length body of the Department for Transport and a publicly-owned company, it should be explicitly excluded from having to make development contributions. I have not been directed to any legislation or guidance which would authorise such an exclusion, nor have I been made aware of any precedents. In particular, the relevant Scottish Government planning circular 3/2012 on ‘Planning Obligations and Good Neighbour Agreements’ (revised 2020) does not indicate exceptions for particular types of organisation. I see nothing in the scope of the proposed policy or the guidance which would justify an exception for Network Rail. The council considers that the policy should apply to all development and I have no basis to recommend otherwise.

Healthcare

4. Homes for Scotland and Robertson Homes challenge the principle of requiring developer contributions towards healthcare facilities. However, they cite no legislation or policy document in support of that position. Neither Scottish Planning Policy nor planning circular 3/2012 make any distinction about who should fund infrastructure which is required to enable a development to proceed; nor do they exclude healthcare as a potential subject of planning obligations. The proposed plan incorporates health and well-being as core components of its development strategy. As with other infrastructure, there requires to be sufficient health care capacity to accommodate any new developments that are proposed.

5. The council names four local authorities who have secured development contributions towards healthcare facilities. That may be indicative, but does not in itself establish the principle. More significant is the letter from the Scottish Government’s Cabinet Secretary for Health and Sport and the Minister for Local Government, Housing and Planning, dated

March 2019. This highlights the need for co-ordination between new development and the provision of healthcare facilities. I therefore see no reason to exclude healthcare from the types of infrastructure for which developer contributions may be sought.

6. NHS Greater Glasgow and Clyde and East Renfrewshire Health and Social Care Partnership draws attention to the fact that strategic policy 2 only commits to analyse the capacity required to support future demand for healthcare infrastructure. The partnership requests that the policy goes further and includes provision of healthcare in the list of facilities/infrastructure for which developer contributions may be sought. It cites current problems with the capacity of primary health care facilities within the plan area.

7. The council argues that, were their analysis to lead to a conclusion that additional healthcare capacity was required in certain locations, this would be reflected in an update to its guidance. However, I consider that this would be contrary to the principle that there should be a policy hook in the plan on which to base a requirement for developer contributions within any amended planning guidance. There is already a sufficient proviso within the policy to the effect that contributions in relation to specified services and infrastructure would be sought only where appropriate, and that proviso would be met only once (and if) the proposed capacity study had justified additional healthcare capacity.

8. For these reasons, I consider that healthcare should be added to the list of infrastructure and services in strategic policy 2 for which contributions may be sought, where appropriate.

Items for which development contributions may be sought

9. The council's summary of the Scottish Government representation 486/10 omits the change which is proposed, namely: "Further detail should be provided in the plan in relation to the items for which developer contributions should 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".

10. As the council explains, no new housing sites are identified for release by the proposed plan. All the housing sites in the proposed plan have been rolled forward from the adopted local development plan, as have the strategic development opportunities listed in the representation. In all of these cases, arrangements for developer contributions have already been agreed with developers and landowners. Outwith the masterplan areas, the council intends to rely on the related supplementary guidance on development contributions as referred to in strategic policy 2.

11. On the last point raised by the Scottish Government, strategic policy 2 refers to all of the items covered in the council's supplementary guidance on development contributions (June 2015) an approach which is likely to be taken forward into any future guidance on the topic.

12. There is therefore no need to provide further detail as requested in the representation.

Reporter's recommendations:

Modify the proposed local development plan by:

1. Amending the second sentence in paragraph 2 on page 30 to read:

“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; digital infrastructure; and community and health and care facilities.”.

2. Amending paragraph 4 of Strategic Policy 2: Development Contributions on page 31 to read:

“Where appropriate, contributions may be sought in relation to Education (including Early Years, Primary, Secondary and Additional Support Needs); Community Facilities (including Community Halls and Libraries and Sports); Healthcare; Parks and Open Space; Transportation Infrastructure; Active Travel; and Green Infrastructure.”.

Issue 4	City Deal	
Development plan reference:	Strategic Policy 3: City Deal	Reporter: Malcolm Mahony
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>James Whyteside (22/1) Alexander Newall (121/3) GoBike (174/5) 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>		
Provision of the development plan to which the issue relates:	<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"> • Action Programme 	
Planning authority's summary of the representation(s):		
<p><u>(a) Strategic Policy 3: City Deal</u> <u>Schedule 1 - Strat 3.1 Aurs Road and Strat 3.2 Lavern Valley Link road</u></p> <p><u>Support</u></p> <p><u>Broom, Kirkhill and Mearnskirk Community Council (255/2) (255/3) (255/4)</u></p> <ul style="list-style-type: none"> • Support for the proposal for funding support under the City Deal and illustrated in Figure 7 on page 33 of LDP2. • Support proposals Strat 3.1: Aurs Road and Strat 3.2: Lavern Valley Link road. <p><u>(b) Schedule 1 - Strat 3.3: Dams to Darnley Country Park – Proposed Visitor Centre</u></p> <p><u>Support</u></p> <p><u>Broom, Kirkhill and Mearnskirk Community Council (255/5)</u></p> <ul style="list-style-type: none"> • Support Strat 3.3 Dams to Darnley Country Park – Proposed Visitor Centre. 		

Visit Scotland (472/2)

- 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'.

Alexander Newall (121/3)

- Content with existing proposals identified for Dams to Darnley Country Park but against any further development in the Park.

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

Support

GoBike (174/5), 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

Schedule 1 - Strat 3.1 Aurs Road and Strat 3.2 Lavern Valley Link road

Support

Broom, Kirkhill and Mearns Kirk 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 Mearns Kirk 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), Alexander Newall (121/3)

- The Council is aware of the sensitivity of the Country Park and the various sites identified for development and has taken a careful and considered approach to each 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/13). 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/83) which accompanied the Dams to Darnley SPG.
- It is not proposed to modify the Plan based upon the above.

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

Support

GoBike (174/5), 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 (CD/84) 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:

Supporting representations

1. The general support in representations for aspects of strategic policy 3 (city deal)

within the proposed East Renfrewshire Local Development Plan 2 is noted but requires no examination.

Proposed visitor centre and cable-wakeboarding facility

2. In relation to Mr Whyteside’s representation, East Renfrewshire Council’s proposals to build a visitor centre and to establish a cable-wakeboarding facility at Balgray Reservoir within the Dams to Darnley Country Park have been the subject of several assessments and studies, which are detailed in the council’s supplementary planning guidance for Dams to Darnley Country Park. These take into account need, feasibility, and the landscape and biodiversity impact of the facilities. The council states that its design brief is for an ecologically sensitive facility that blends into the rural setting. The visitor centre has also been the subject of a formal strategic environmental assessment.

3. My role in this examination is to satisfy myself that the council’s proposals are appropriate and sufficient, and not to substitute my judgement for its development and investment choices. Visitor centres and low-key sporting facilities are provided in many, if not most, country parks throughout the country. The council has the discretion to provide such facilities. In this case, it has clearly taken care to assess and justify the choice of watersport it intends to provide, and the location and design of its proposals. Consequently, I have no basis for finding that they are inappropriate or that they should be deleted from the proposed plan.

4. Mr Newall’s representation relates to future development at the country park. However, this goes beyond my remit, which is confined to the proposals and policies contained in the proposed plan.

Barrhead South Train Station

5. The strategic case for a new station in this location has not yet been made. Transport constraints have been identified and the Barrhead South Accessibility Appraisal is underway. This comprises a multi-modal transport appraisal in line with Scottish Transport Appraisal Guidance. I note that Network Rail sounds a note of caution on the potential for network-wide impacts in relation to the planning and delivery of railway infrastructure. I also agree that the proposed plan should not pre-empt the outcome of the appraisal study. Therefore, I consider that the relevant entries in the supporting text on page 32 of the proposed plan and in Schedule 1: City Deal Proposals should be amended on the lines suggested by the Scottish Government representation. This matter is further addressed in Issue 5 (areas for change) and Issue 12 (sustainable transport networks and access).

6. Matters related to the council’s Action Programme fall outwith the remit of this examination, which is confined to consideration of the proposed plan.

Reporter’s recommendations:

Modify the proposed local development plan by:

1. Amending the wording of the third paragraph on page 32 of the proposed plan to read:

“Investment will support the development of new recreational, tourism and leisure opportunities at the Dams to Darnley Country Park; new business infrastructure and

development; employment; an enhanced road network; and a new rail station, subject to the outcome of the Barrhead South Accessibility Appraisal being undertaken in line with Scottish Transport Appraisal Guidance and subsequent business case studies.”.

2. Amending the last row in the table under Schedule 1: City Deal Proposals on page 34 to read:

“3.7. Barrhead South Accessibility Appraisal. This appraisal is being undertaken in line with Scottish Transport Appraisal Guidance to determine the optimum transport solutions to identified transport constraints in the area. It will examine a range of options within the Barrhead South area, including the potential for a new rail station. The outcomes of the appraisal will be used to develop a business case for any option or options which are to be taken forward.”.

Issue 5	Areas for Change	
Development plan reference:	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	Reporter: Malcolm Mahony
Body or person(s) submitting a representation raising the issue (including reference number):		
Mr and Mrs Green (133/1) Scottish Natural Heritage (178/14) Broom, Kirkhill and Mearns Kirk Community Council (255/6) (255/7) (255/8) Network Rail (475/2) Scottish Government (486/11) Tarmac (491/1)		
Provision of the development plan to which the issue relates:	Section 2: Managing and Enabling Growth Areas for Change- Spatial Delivery of Growth pages 35 to 41	
Planning authority's summary of the representation(s):		
<p><u>(a) Policy M1: Master Plans</u></p> <p><u>Support</u></p> <p><u>Scottish Natural Heritage (178/14)</u></p> <ul style="list-style-type: none"> • Reiterate support for the inclusion of Policy M1: Master Plans and consider that master planned sites offer good opportunities to plan and deliver successful, sustainable development which is place-based. The promotion and enhancement of a <i>“multi-functional and accessible green network of connected green infrastructure and open space throughout the site and integrated with the wider Green network”</i> is welcomed for each of the master plan areas. <p><u>Broom, Kirkhill and Mearns Kirk Community Council (255/6)</u></p> <ul style="list-style-type: none"> • Support Policy M1: Master Plans. <p><u>(b) Policy M2 – M77 Strategic Development Opportunity</u></p> <p><u>Support</u></p> <p><u>Broom, Kirkhill and Mearns Kirk Community Council (255/7)</u></p>		

- Support Policy M2: M7 Strategic Development Opportunity.

Objections

Tarmac (491/1)

- Seeking to extend the boundary of the Strategic Development Opportunity identified within Policy M2 to include their site, shown as Appendix A of the submission.
- 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

Scottish Natural Heritage (178/14), 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/68) 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/69). 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’ (CD/85).
- 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/01), 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 Mearns Kirk 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 master plan designation (CD/06), 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 the STAG process within Criterion 2 of the policy. This would also reflect the outcome of the Barrhead South Accessibility Appraisal (CD/84).
- 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:

Supporting representations

1. The general support for policies M1, M2 and M2.1 in representations is noted but requires no examination.

Policy M2: M77 Strategic Development Opportunity

2. As the council points out, since the M77/ Glasgow Southern Orbital (A77) corridor is not a National Development identified in National Planning Framework 3 (2014) nor a project identified in the national Infrastructure Investment Plan, references to these documents do not support Tarmac's proposal to extend the Strategic Development Opportunity west of junction 5 on the M77 on its site at Pilmuir.

3. Tarmac also cites Policy SG10: Sustainable Transport Network of the adopted East Renfrewshire Local Development Plan (2015) in support of its proposal. This policy safeguards existing transport infrastructure, in particular the M77 and Glasgow Southern Orbital, from development that could prejudice its ability to function. It does not, however, promote further development in the vicinity, other than a potential motorway service area at Newton Mearns which has since been superseded and is no longer an active project. It cannot therefore be claimed that development proposals for the Pilmuir site follow on from

the adopted plan.

4. The council is additionally concerned that further development proposals at this location might prejudice the ability of the M77/ Glasgow Southern Orbital, which would serve the proposed development, to function efficiently. I note that no evidence has been presented to the examination to assess the impact of new development at Pilmuir on the strategic road network. The council's concerns have not therefore been addressed.

5. The promoted site would constitute an incursion comprising over 17 hectares of development into open countryside and green belt. Under policy M2 of the proposed plan, the M77 Strategic Development Opportunity area extends over a wide tract of land between Newton Mearns and Barrhead. At its edges, two urban expansion areas are identified by policies M2.1 and M2.2. Whilst the eastern arm of the Pilmuir site lies within the policy M2 site, it is not within the urban expansion areas. The policy designates land not within the master planned urban expansion areas as green belt. Consequently, the site gains no support from this policy.

6. In this locality, the green belt boundary follows the line of the M77 and the A77. The 'Green Belt Landscape Character Assessment Update' (2016) assesses this to be a strong boundary. By contrast, the promoted site would substitute a far weaker boundary – part of a golf course bounded by a hedgerow, lochside, open land with scattered trees and woodland – opening the way to further development sprawling into open countryside. Whereas the existing green belt bounds a compact urban form, the proposal would project into open countryside.

7. For all the above reasons, there is no justification for extending the Strategic Development Opportunity.

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

8. Fa'side House is a category B-listed building set well back from Ayr Road, with its access driveway passing Fa'side Lodge then skirting a paddock with rocky outcrops which slopes up towards the house. The trees around the house and forming an avenue along the driveway are designated as a local biodiversity site (see also Issue 11 - natural environment). Those trees form an attractive setting for the house, whilst largely screening it from public view.

9. The proposals map indicates Fa'side House, the paddock and some 85 hectares of land to the south-east, south, west and north as all lying within the M2.1 Maidenhill/ Malletsheugh Strategic Development Opportunity, whose development is to be governed by a masterplan. The paddock is indicated as subject to policy D5 (urban greenspace) and the surrounding 85 hectares is designated as SG1 Housing Supply, Delivery and Phasing.

10. The current owners argue that the paddock between Fa'side House and Ayr Road should be re-designated as development land forming part of the adjoining SG1 area. They contend that the D5 designation in the proposed plan prejudices the value and enjoyment of their site. Whilst they have no intention to pursue development at this time, they regard it as unfair that the land should be treated as a passive, non-profitable use and part of the green network whilst assisting the house-builders to maximise their profits.

11. Maidenhill Master Plan was drawn up in June 2015 and forms Supplementary Planning Guidance in association with the adopted local development plan. It shows a wide belt to south of Ayr Road as undeveloped other than for footpath links. That belt together with the adjacent paddock follow the north-facing brae which separates the new housing development from Ayr Road. I consider that the brae, as a whole, provides a useful and appropriate function as part of the landscape framework within the wider urban area of Newton Mearns. Whilst the proposals map may give the impression that the paddock is singled out as greenspace within the Strategic Development Opportunity, the detail of the masterplan shows how it fits into a substantial green network extending throughout the Maidenhill development. Similar tracts of protected urban greenspace can also be seen throughout Newton Mearns to the benefit of its landscape character.

12. Under policy D5, the council will protect and support a diverse and multi-functional network of urban greenspace. In this case, the most relevant of those functions relate to landscape setting, green network and amenity. In those respects, an urban greenspace designation is appropriate for the paddock.

13. I note that the proposed plan is consistent with the adopted local development plan in its designations of urban greenspace, local biodiversity site, and masterplan area for the surrounding land.

14. For all the above reasons, I do not propose to recommend any amendment to the proposed plan.

Policy M2.2: M77 Strategic Development Opportunity – Barrhead South – Springhill, Springfield, Lyoncross

15. The M77 Strategic Development Opportunity is subject to a masterplan, whose requirements are set out in Policy M2.2. Point 2 of the policy refers to transportation improvements including a railway station at Barrhead South. However, because a multi-modal transport appraisal, in line with Scottish Transport Appraisal Guidance, is still underway, it would be inappropriate for the policy to pre-judge that the outcome of the appraisal would be to support a new railway station at that location. The wording of the policy therefore requires to be changed along the lines suggested by the Scottish Government. This matter is further referred to in Issue 4 (city deal) and Issue 12 (sustainable transport networks and access).

Reporter’s recommendations:

Modify the proposed local development plan by:

1. Amending point 2 of Policy M2.2: M77 Strategic Development Opportunity on page 40, in part, to read:

“2. Provision of a sustainable roads, access and transport strategy, including: improved connections to the 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 new railway station (subject to the outcome of the Barrhead South Accessibility Appraisal, being undertaken in line with Scottish Transport Appraisal Guidance), a bus interchange (Strat 3.6), and ...”.

Issue 6	Braidbar Quarry, Giffnock	
Development plan reference:	Policy M4: Master Plan Braidbar Quarry	Reporter: Alasdair Edwards
Body or person(s) submitting a representation raising the issue (including reference number):		
<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 McMahan (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 C 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)
 Mr and Mrs Roberston (193/1)
 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)
 Mr and Mrs G. Wyllie (202/1)
 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)
 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)
 Robert McDonald (314/1)
 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)
 Clarkston Scottish Wildlife Trust (380/1)
 Dr Colin M Tait (381/1)
 Mrs Elizabeth Tait (383/1)
 Laura Wiggins (385/1)
 Sheila Watson (386/1)
 Laura Charles (387/1)
 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)
 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)

<p>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) (468/4) Andrew Morley (469/1) Heather Hughes (479/1) Shirley Wallace (481/1) G Muir (483/1) Derek Duncan (485/1)</p>

<p>Provision of the development plan to which the issue relates:</p>	<p>Section 2 Managing and Enabling Growth Policy D4: Green Network Policy D5 Protection of Urban Greenspace Policy M4: Master Plan 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"> • Site Evaluation • Strategic Environmental Assessment
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Planning authority’s summary of the representation(s):

<p><u>Support</u></p> <p><u>Sport Scotland (7/10)</u></p> <ul style="list-style-type: none"> • LDP2 should exclude Huntly playing fields from the M4 area.
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- Highlights that LDP2 proposes protection of Huntly playing fields under D13.
- Highlights that SPP para 226 would apply to the protection of Huntly Playing fields.

William Wallace (74/1)

- 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 C 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 Phillips (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 Monteith (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), 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), Mr and Mrs Roberston (193/1), 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), Mr and Mrs G. Wyllie (202/1), 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), 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), Robert McDonald (314/1), 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), Laura Charles (387/1), 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), Derek Duncan (485/1)

- 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

Objections

Alex Mackie (55/2)

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

Giffnock Community Council (131/2)

- Objects to the associated CS014 Braidpark Drive development listed in Site Evaluation, which is linked to policy M4.
- Removing a large area of well-established woodland and undisturbed habitat to make way for a construction project of any description, regardless of mitigation measures, is unlikely to improve biodiversity in the area.

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.

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

Objections

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 Tritchler (149/1), Allan C 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), Mr and Mrs Roberston (193/1), 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), Mr and Mrs G. Wyllie (202/1), 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), 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), Robert McDonald (314/1), 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), Laura Charles (387/1), 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), Derek Duncan (485/1)

- 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

Objections

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

Objections

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

Objections

Mary MacCallum (468/4)

- 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

Objections

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 Tritschler (149/1), Allan C 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), 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), Mr and Mrs Roberston (193/1), 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), Mr and Mrs G. Wyllie (202/1), 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), 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), Robert McDonald (314/1), 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), Laura Charles (387/1), 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), Derek Duncan (485/1)

- 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/41). 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 (page 165 Para 5 of Examination Report) (CD/05). 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/68) 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/36) 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

Objections

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

Objections

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

Objections

Mary MacCallum (468/4)

- 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

Objections

Giffnock Community Council (131/2), Jane Floyd (173/2), Susan Grant (263/2), Mairead Fernandez McCann (407/2)

- Representations objected to the scoring and findings of the Site Evaluation (CD/34) and Strategic Environmental Assessment (CD/33). Other issues raised regarding loss of greenspace and physical impact of development are addressed above.
- 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:

Site evaluation and strategic environmental assessment

1. Representees question the site evaluation and strategic environmental assessment scoring. However, this examination is only concerned with unresolved issues to the proposed plan. Consequently, revision of scoring is not within the remit of this examination. In any case, I have responded directly to the matters raised by those concerned in relation to the evaluation and assessment through my findings below.

Policy M4: Braidbar Quarry

2. The former sandstone quarry at Braidbar was promoted in the finalised East Renfrewshire Local Plan as a strategic development site comprising private and affordable housing, sports facilities, protected greenspace and a retained right of way. Due to potential impacts on existing uses on the site and the surrounding area this proposal was

rejected at the examination stage in 2010 with the reporter recommending that the land continue to be protected as urban greenspace policy and a site of importance for nature conservation.

3. In 2015 the report of examination in to the now adopted East Renfrewshire Local Development Plan concluded that it was appropriate to retain Braidbar Quarry as a longer term development opportunity remaining as open space until such time as a development brief was prepared to guide remediation/development of the site. The reporter also concluded that any loss of sports pitches (or alternative provision) could be suitably addressed through a development brief. The examination report recommended that the development brief for the site be adopted as statutory supplementary guidance.

4. The adopted East Renfrewshire Local Development Plan identifies only the northern part of Huntly Park as a longer term development opportunity with southern parkland covered by urban greenspace and local biodiversity site designations. However, the proposed East Renfrewshire Local Development Plan (the plan subject to this examination) promotes both the northern and southern parkland as a longer term development opportunity. This represents a change in circumstances over that previously examined.

5. While identified as a master plan area, the entire site is covered in the proposed plan as protected urban greenspace and the majority of the area is within the Giffnock Scrub Local Biodiversity Site. As confirmed from my inspections, the area includes a clubhouse, a floodlit blaze pitch and sports pitch to the north accessed from Braidbar Drive. There is grassland to the south of these pitches beyond a band of trees inaccessible due to heavy-duty metal fencing. A right of way is shown on the proposals map crossing the site (east to west) but, at the time of my visit, this route was fenced off with a padlocked gate at the Braidbar Drive entrance opposite Braidpark Drive; a small section of the route was accessible to the west of the blaze pitch albeit overgrown. A pavilion, grass pitches and a play area are located to the south of Huntly Avenue with further pitch provision further east of this location accessed from a formal pathway through areas of fenced off mixed woodland. An open watercourse and further accessible grassland is found to the south of the site, north of a railway line. A large proportion of the site is fenced off and marked as dangerous.

6. There is a clear distinction between this site and other master plan sites promoted in the proposed plan in that the land at Braidbar Quarry is not allocated for housing and there are no firm proposals for its development at this time. The proposed plan simply identifies potential for development to allow for the remediation of the former sandstone quarry (a priority for the council as the land is deemed unstable). A development brief is required for the site (which would be subject to consultation) and there are known constraints to development including education capacity; the need to retain (or find suitable alternative provision for) sports pitches and facilities; potential flood risk; and the designation of most of the site for biodiversity. The examination report into the local plan also flagged up issues related to remediation and construction having an impact on the amenity of local neighbours.

7. Representees are correct that, as stated in Issue 14 (housing supply, delivery and phasing) there is no need to find land for additional housing at present to meet the housing land requirement. However, an exception to the release of land for housing at Braidbar Quarry could potentially be made on the basis of providing finance to enable the remediation.

8. A remediation strategy and the development brief would need to respond to the known constraints (as listed in paragraph 6 above) and also address matters of concern raised to this examination including: congestion; air-quality; health; access to services; potential release of contaminants; carbon dioxide emissions; retention of the right of way; impact on visual amenity; and a response to retaining paths, open space and biodiversity areas. Beyond that, planning permission would be required for consent to develop the land which would entail further consultation and detailed evaluation.

9. The proposed plan does not promote Braidbar Quarry for development in the immediate future but identifies potential to respond to the need to remediate a former unstable quarry. The plan is clear that the land is protected urban greenspace and that Huntly Park should continue to be protected. I am satisfied that there is sufficient policy provision within the plan to ensure the protection of biodiversity and respond to the constraints identified. On this basis, I find that identification of Braidbar Quarry as an M4 master plan area should be retained within the proposed plan; and that there is no need to exclude Huntly Park from the area identified.

Proposal D7.3: Local Biodiversity Sites - Giffnock Scrub

10. The council confirms above that woodland to the east of Huntly Park adjacent to the railway line is part of the Giffnock scrub local biodiversity site omitted from the proposals map in error. Consequently, I find that the proposals map should be modified to correctly identify the true extent of this local biodiversity site.

Proposal D8.1: Core Paths

11. Consideration of a core path between Huntly Park and Muirend Park is addressed at paragraph 8 within Issue 12 (sustainable transport networks and access) below.

12. With respect to identifying the route for active travel, I note that schedule 6 of the proposed plan (sustainable transport networks and access projects) refers directly to networks of paths rather than individual paths so would it would not be appropriate to list this route within that schedule. Having inspected the area, there is a potential off-road access from Huntly Park to Muirend Park between the rear gardens of 47 and 49 Braidpark Drive (as shown on the proposals map as a thin green strip). However, this route is impassable due to vegetation and I am unaware if this is public or private land. Blue cycle signage on Braidpark Drive indicates an alternative on-street route to Muirpark from Huntly Park along Cunningham Drive. In these circumstances, there is insufficient evidence to identify a specific active route between Huntly Park and Muirend Park at present. However, the council has indicated that it will pursue this issue. No change to the plan is required to address this matter.

Proposal D12.6: Huntly Park

13. Schedule 8 (community facilities) within the proposed plan refers to “improvement of football facilities and new build pavilion – linked with longer term proposals at Braidbar Quarry”. This indicates that the two are intrinsically linked. I agree with the representee that the provision of these facilities is not necessarily dependent on the longer term development opportunity for Braidbar Quarry as the funding for these could come from other sources. Therefore, I recommend a slight modification to the text to refer to the longer term development opportunity being a potential facilitator for improved/new facilities. This would align with the council’s response that the plan provides a mechanism

where improvements could be facilitated as part of the wider remediation of the area.

Reporter's recommendations:

Modify the proposed local development plan by:

1. Amending the proposals map to show the true boundary of the Giffnock Scrub Local Biodiversity Site including the woodland in the southern part of Huntly Park. This area should be identified as being covered by the D7.3 'Local Biodiversity Site' designation.
2. Replacing the description for D12.6 Huntly Park, Giffnock within Schedule 8: Community Facilities on page 82 with "Improvement of football pitches and new build pavilion potentially facilitated by longer term proposals at Braidbar Quarry (Policy M4)".

Issue 6 – Braidbar Quarry**Appendix 1 – Common Objections**

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 Tritschler (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), Mr and Mrs Roberston (193/1), 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), Mr and Mrs G. Wyllie (202/1), 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), Agapitos Patakas (262/1), Susan Grant (263/1), Yi Hwei 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), Robert McDonald (314/1), 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), Laura Charles (387/1), 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), Derek Duncan (485/1)

Lorna Alexander (13/1)

- Site is directly to rear of home, construction would create noise and disruption for many years.
- Adverse effects on outlook and use of rear garden
- Increased people activity in the area
- Increased pressure on denominational schools in the area
- Loss of park & greenspace for children & community
- Impact on quality of life

William Bailey (15/1)

- Strongly object to building houses on Braidbar/Huntly park
- Would create years of traffic congestion and air pollution
- Would remove a beneficial greenspace
- The area does not need another 300-400 homes
- Supportive of remediation of Braidbar into recreational space
- Support policy D5 protection of open space

Lynsey Craig (16/1)

- Traffic congestion concerns, insufficient infrastructure, both within the road and rail network to cope with hundreds of new homes

- Pollution concerns
- Loss of Huntley park runs counter to help people get fit and there is potential to enhance the park facilities.
- Support Policy D5

Bob Bryce (17/1)

- Support the remediation of all the grounds at the Quarry and Huntly Park locations
- Object to classifying the entire area under code M4 as this green space is not suitable for housing development due to the destruction of this green space and the complete lack of infrastructure that exists.
- Impact upon quality of life issues such as air pollution caused by traffic congestion
- Support the classification for this area as code D5 after the remediation work by turning this green space into a much needed community recreation area for sports and leisure activities
- No demand for new builds in this area that would justify any housing development on this site following the remediation work

Neil Watson (19/1)

- Opposed to any building on the old Braidbar Quarry site
- Supports Policy D5 Protection of urban greenspace.

Alicia Whyte (20/1)

- Severe congestion difficulties especially on Braidpark Drive, Braidholm Rd and Fenwick Rd.
- Parkland and greenspace within site further eroded.
- No consideration of provision of amenities needed for such a high number of houses and how local schools could cope.
- Adverse impact on local residents for number years whilst works undertaken

Lyndsay MacLeod (21/1)

- Not objecting to principle of making quarry area safe, however object to any proposal to build hundreds of houses at the site.
- Negative impact on surrounding area & infrastructure
- Long-term congestion and pollution problems
- Loss of greenspace adversely affecting health & well-being of all.
- Quarry site valuable home for local wildlife.
- No urgent need for more houses therefore appears primarily a money making exercise.
- Existing infrastructure could not cope with proposed building activity
- Local schools and community facilities unlikely to absorb such large population increase.
- Supports Policy (D4 – Green network and infrastructure) and Policy (D7.3 Local Biodiversity sites)

Anne Philips (24/1)

- Potential contamination
- Traffic Congestion

- Loss of amenity and open space
- Overcrowding of local schools

Elaine Grimes (25/1)

- Major housing development would upset village nature of Giffnock.
- Loss of amenity and open space (Huntly park)
- Adversely affect health & well-being.
- Years of disruption to residents.

Mark Heron (26/1)

- Loss of amenity & open space (Huntly Park).
- Increased strain on schools & transport (roads & parking)

Callum Johnson (27/1)

- Adversely affects amenity of area
- Traffic congestion issues

Ross Burns (28/1)

- Loss of greenspace & impact on community

Diane Campbell (29/1)

- No need for further housing in Giffnock.
- Depletion of existing services
- Erosion of greenspaces not required as important for a thriving community.
- Would result in years of disruption.
- Roads & traffic congestion issues

Martin Campbell (30/1)

- No need for further housing in Giffnock.
- Result in years of disruption on rds. (including noise & construction pollution)
- Strain on existing schools & services
- Loss of greenspace & wildlife.
- No specific community benefit

Joanna Leslie (31/1)

- Lack of infrastructure to support more houses
- Strain on local schools/nursery
- Construction/noise issues
- Loss of greenspace/wildlife

Vicky Lafferty (32/1)

- Safety issues building houses in vicinity of quarry.
- Traffic congestion issues.
- Loss of greenspace.

Lindsey Coyne (33/1)

- No development wanted at either Braidbar Quarry or Huntly Park.
- Loss of greenspace & wildlife and adverse impact on health well-being.

Louise Chalmers (34/1)

- No development wanted at either Braidbar Quarry or Huntly Park.
- Loss of greenspace & wildlife and adverse impact on health well-being.

Anna Curley (35/1)

- Local infrastructure insufficient to support development
- Traffic congestion
- Positive objectives of plan outweighed by negative impact of development.
- Support for policy D5 – Protection of Urban Greenspace

Mary Walker (36/1)

- Loss of greenspace
- Pressure on existing schools

Gail Duff (37/1)

- Loss of greenspace
- Pressures on local facilities
- Pressure on schools
- Traffic congestion

Patrick Ruddy (38/1)

- Loss of greenspace & wildlife and adverse impact on health well-being.
- Strain on existing services
- Support for policy D5 – Protection of Urban Greenspace

Alison Ruddy (40/1)

- Loss of greenspace/wildlife
- Strain on infrastructure
- Traffic congestion & pollution concerns
- Support for policy D5 – Protection of Urban Greenspace

Thomas Fay (41/1)

- No need for further housing in Giffnock.
- Loss of greenspace & wildlife.
- Previous Plans dismissed by Scottish Government Reporter
- Loss of greenspace/wildlife, strain on infrastructure
- Support for policy D5 – Protection of Urban Greenspace and D7.3 –Biodiversity Site

Peter Wiggins (42/1)

- Pressure on schools infrastructure
- Increased traffic flows
- Pressure on public transport
- Loss of greenspace (including semi-natural woodland/Local Biodiversity site (LBS)/green corridors & wildlife assets)
- Loss of Public Right of Way
- Review options for remediation/stabilisation through netting, allotments & cycle paths & routes to Braidpark Drive, Giffnock Town Centre & train station & bus services.

Paul Verrico (43/1)

- Supports remediation to make safe, however should remain recreational parkland to maintain quality of life of local residents.
- Increased traffic congestion & pollution.
- Adverse impact on bio-diversity
- Increased pressure on local amenities (including roads, schools & other facilities.)
- Plan has sufficient housing to meet its requirements.
- Plans previously rejected by Scottish Government reporter (2011)
- Only most adversely affected homes be remediated or purchased by Council to solve what has been a longstanding problem

Andrew Jarvis (44/1)

- Housing development not in the interests of existing residents
- Adverse impact on local infrastructure & environment
- Potential to release dangerous chemicals below ground from the old quarry.
- Increased congestion & related pollution
- Loss of greenspace.
- Support for policy D5 – Protection of Urban Greenspace and D7.3 –Biodiversity Site

Thomas McGuire (45/1)

- Object

Lesley MacKay (46/1)

- Loss of greenspace
- Adverse impact on roads and associated congestion.
- Support for policy D5 – Protection of Urban Greenspace and D7.3 –Biodiversity Site

William Welsh (47/1)

- Support for policy D5 – Protection of Urban Greenspace

Catherine A. S. Welsh (48/1)

- Support for policy D5 – Protection of Urban Greenspace

Sharon De Sykes (49/1)

- Adverse impact on quality of life to residents
- Noise & disruption caused by works
- Environmental/pollution concerns over disturbing made up ground.
- Pressure on existing schools already at full capacity.
- Pressure on existing community services.
- Pressure on existing roads with increased congestion & associated pollution
- Loss of greenspace & wildlife.
- Previous plans dismissed by Scottish Government Reporter (2011)
- Support for policy D5 – Protection of Urban Greenspace

Norma Morrison (50/1)

- Concerns about impact of development on infrastructure, services and greenspace.

Dan Greenberg (51/1)

- Traffic & congestion concerns
- Loss of greenspace & wildlife
- Disruption (noise etc.) of building works for many years
- Insufficient infrastructure (e.g. overcrowded primary schools)
- No need for extra (300-400) houses over the next 10 years.

Alastair Kelly (52/1)

- Support for policy D5 – Protection of Urban Greenspace

Colin McMahon (53/1)

- Agree with remediation/making site safe but objects to associated housing development.
- Loss of greenspace
- Traffic congestion.
- Impact on schools infrastructure
- Health risks disturbing underground contaminants.

Joan Bryans (54/1)

- No current need/requirement for new housing
- Access & traffic congestion problems.
- Adverse impact on Giffnock conservation area
- Strain on schools in the area
- Previous plans dismissed by Scottish Government Reporter (2011)
- Support for policy D5 – Protection of Urban Greenspace and D7.3 –Biodiversity Site

Alex Mackie (55/1)

- Clarity required of the Huntly Park protected area
- Questions the cost of remediation options
- Loss of amenity & greenspace during remediation operations
- Loss of existing cycling/walking paths for several years

- Noise & disruption from heavy construction traffic
- Strain on and requirements for improved transport, healthcare & schools.
- Houses bordering Forres avenue and affected by quarry have not been included as part of policy.

Gillian Gordon (57/1)

- Loss of greenspace especially for unaffordable housing
- Loss of wildlife habitat
- Impact on health & well-being
- Adverse impact on carbon emissions
- Pollution concerns
- Noise & disruption from years of construction
- Increased traffic congestion
- Health & safety risks disrupting underground chemicals

Bernard Conway (58/1)

- Loss of greenspace
- Huntly Park well used by the whole community (including sports pitches)
- Increased traffic congestion
- Strain on education & health infrastructure and need for increased facilities
- Support for policy D5 – Protection of Urban Greenspace

Janet Boe (61/1)

- Loss of greenspace & wildlife
- Huntly Park well liked & used by range of population throughout the year.
- Pressure on infrastructure, especially schools.
- Traffic congestion.
- Impact on quality of life.

Byron Myrden (62/1)

- Loss of greenspace
- No need for housing
- Pressure on schools & roads

Emma Ritchie (63/1)

- Quality of life negatively impacted (during both remediation & bdg. works)
- Increased noise /pollution & traffic impacts
- Loss of greenspace/parkland/wildlife habitat.
- Adverse impact on local infrastructure (including schools)
- Safety concerns that any remediation works likely to uncover (hazardous materials/chemicals)
- Previous plans at site rejected by Scottish Government Reporter (2011)

Laura Harrison (64/1)

- Quality of life & mental well-being negatively impacted.
- Support remediation (provide used as a community asset not for housing)

- Adverse impact of remediation works for many years.
- Previous plans at site rejected by Scottish Government Reporter (2011)
- Loss of greenspace/parkland

S McGeady (66/1)

- Should remain untouched/not used for building purposes.
- Loss of greenspace/parkland (recreational area)/ wildlife habitat.
- Increased traffic (road safety concerns), congestion & pollution.

Gerry Coyle (67/1)

- Remediation works likely to uncover more problems/issues.
- Increased risk of flooding.
- Large housing development would remove greenspace & adversely impact local wildlife.
- Increased infrastructure pressures.
- Increased traffic congestion in the area.
- Access points would be insufficient to accommodate development.
- Support for policy D5 – Protection of Urban Greenspace

Alan Ferguson (68/1)

- No consent for development should be given at this site.

Elizabeth Roberta Ferguson (69/1)

- No consent for development should be given at this site.

Frank Kaye (70/1)

- Questions need to build 300-400 houses on this site.
- Questions whether there would be suitable access.

Gordon Connell (71/1)

- Loss of greenspace /park well used by local residents.
- Risk to environment from contamination/underlying toxins.
- Cost of remediation cannot be outweighed by new housing (concerns about safety)
- No need for further development.
- Traffic congestion concerns

Francis Burns (72/1)

- No housing appropriate for site
- Remedial works could be done/financed over a number of years
- However remediation works would destroy the quality of life within the area.

Lesley MacDonald (75/1)

- Objects to development on quarry site.
- Retained as greenspace for enjoyment of local residents.

Nancy Dear (76/1)

- Objects to housing development site both Braidbar Quarry & Huntly Park
- Loss of greenspace/park, biodiversity and nature conservation interests.
- Pressure on infrastructure (roads & schools).
- Huntly Park is a community asset for walking, running & playing and is good for both physical & mental health.
- Support for policy D5 – Protection of Urban Greenspace and D7.3 –Biodiversity Site

Caroline Wilkinson (77/1)

- Objects to housing development
- Any remediation should then create an area for the community.
- Stress on infrastructure (doctors, schools, roads & traffic).
- Long-term (10 years) disruption to quality of life.
- Noise & traffic congestion.
- Previous plans dismissed by Scottish Government Reporter (2011)
- Support for policy D5 – Protection of Urban Greenspace and D7.3 –Biodiversity Site

Pamela Campbell (78/1)

- Oppose any development (Braidbar Quarry /Huntly Park)
- Traffic congestion/road safety
- Impact on schools infrastructure

Michael Watt (79/1)

- No requirement for new houses - housing need met
- development would create: noise /traffic/pollution
- Disturbance to wildlife
- Support designation of Braidbar as a LBS under D7.3
- Stress on infrastructure (doctors, schools, rds & traffic).
- No need for additional housing
- Previous plans dismissed by Scottish Government Reporter (2011)

James Scott (80/1)

- Traffic Congestion/road junction difficulties
- Support retention of Braidbar under Policy D7.3
- Andrew Wodehouse & Lorna Campbell 81/1
- increased traffic
- poor air quality
- school capacity
- loss of biodiversity
- Support for Policy D5 – Protection of Urban Greenspace and D7.3 –Biodiversity Site Previous plans dismissed by Scottish Government Reporter (2011).

Andrew Wodehouse & Lorna Campbell (81/1)

- Increased traffic
- Poor air quality

- School capacity
- Loss of biodiversity
- Support for Policy D5 – Protection of Urban Greenspace
- Support retention of Braidbar as LBS under D7.3
- Previous plans dismissed by Scottish Government Reporter (2011)

Gavin Dickson (82/1)

- loss of greenspace
- loss of biodiversity
- traffic congestion
- air pollution
- Previous plans dismissed by Scottish Government Reporter (2011)

Catherine Drew (83/1)

- damage to biodiversity
- lack of infrastructure to support more houses
- traffic congestion
- Previous plans dismissed by Scottish Government Reporter (2011)
- Support for Policy D5 open space designation

Jean M Rankin (84/1)

- Concerned about impact upon environment in the area

Mr & Mrs W Arnott (85/1)

- increase traffic
- loss of greenspace amenity
- strain on community facilities
- Support for policy D5 – Protection of Urban Greenspace and D7.3 –Biodiversity Site

Douglas Harvie (86/1)

- unsuitable for construction traffic
- no need for additional houses

Alastair I. Grant (87/1)

- traffic congestion
- Support for policy D5 – Protection of Urban Greenspace and D7.3 –Biodiversity Site

James H Kennedy & Hilary L Kennedy (88/1)

- no housing need
- insufficient infrastructure

Pearl du Feu (89/1)

- congestion
- insufficient infrastructure

- construction disruption
- Support for policy D5 – Protection of Urban Greenspace

Janet Reid (90/1)

- congestion
- unsafe for houses
- Support for policy D5 – Protection of Urban Greenspace

Thomas Birkett (91/1)

- loss of greenspace
- insufficient existing infrastructure
- Support for policy D5 – Protection of Urban Greenspace and remediation for use of greenspace

G W Montieth (92/1)

- construction traffic
- congestion on roads network
- pressure on schools/medical centres
- no housing need

Monica Finnegan (93/1)

- Traffic congestion
- Support for policy D5 – Protection of Urban Greenspace

B S Laidlaw (94/1)

- Traffic congestion
- disruption during construction
- infrastructure cannot cope
- loss of biodiversity
- no housing need/sufficient housing supply

K Monteith (95/1)

- traffic congestion
- construction traffic
- insufficient infrastructure
- no housing requirement
- loss of greenspace and biodiversity
- Previous plans dismissed by Scottish Government Reporter (2011)
- Support for policy D5 – Protection of Urban Greenspace

Anne Howard (96/1)

- loss of greenspace
- traffic congestion
- pressure of infrastructure

Tom Carlin & Lucy Macintyre (97/1)

- Support for policy D7.3 –Biodiversity Site
- Previous plans dismissed by Scottish Government Reporter (2011)

P E McKinlay (98/1)

- loss of greenspace
- risk of disturbing contamination
- Support for policy D5 – Protection of Urban Greenspace

Jean MacMillan (99/1)

- loss of greenspace
- traffic congestion and air pollution
- Previous plans dismissed by Scottish Government Reporter (2011)
- Support for policy D5 – Protection of Urban Greenspace

Mrs H G Payne (100/1)

- traffic congestion
- negative impact on climate

Peter Cupples (101/1)

- construction disruption
- traffic congestion
- impact on services
- Support for policy D5 – Protection of Urban Greenspace

David Boyes (102/1)

- loss of greenspace
- no housing requirement/sufficient housing supply
- pressure on local services
- construction traffic
- traffic congestion
- Previous plans dismissed by Scottish Government Reporter (2011)
- Support for policy D7.3 –Biodiversity Site

Elaine Boyes (103/1)

- loss of greenspace and biodiversity
- sufficient housing supply/no need for houses
- pressure of local services
- traffic congestions
- Previous plans dismissed by Scottish Government Reporter (2011)
- Support for policy D7.3 –Biodiversity Site

Alicia Whyte (104/1)

- Given the number of houses and that 2 access roads would feed into Braidpark Drive this would create severe traffic congestion to an already difficult entry to Braidholm Road and further congestion onto Fenwick Road.
- It would further erode the park land and green space
- There appears to be no consideration of provision of amenities for such a high number of houses and how the local schools could cope with such an increase in numbers.

Morris Van Looy 106/1

- No need for further housing
- Adverse impact on local infrastructure (roads, schools, health facilities)
- Adverse impact on environment.
- Support for policy D5 – Protection of Urban Greenspace

Connie Shields (107/1)

- Adverse impact on existing housing in area
- Heavy vehicles/machinery disruption for many years.
- Adverse impact on well-being of residents & house values.
- Support for policy D5 – Protection of Urban Greenspace

Gordon Ingram (108/1)

- Objects to housing development
- Traffic congestion & increased traffic pollution.
- Adverse impact on local infrastructure (rds., schools, health facilities)
- Loss of greenspace
- In event quarry needs remediated, reinstated land should be used for local community/recreational facilities.
- Support for policy D5 – Protection of Urban Greenspace

Martina Ingram (109/1)

- Objects to housing development
- Traffic congestion & increased traffic pollution.
- Adverse impact on local infrastructure (roads, schools, health facilities)
- Loss of greenspace
- In event quarry needs remediated, reinstated land should be used for local community/recreational facilities.
- Support for policy D5 – Protection of Urban Greenspace

Gerard Fay (110/1)

- Objects to any development on site.
- Loss of greenspace/wildlife/biodiversity
- Disruption (noise etc.) for years.

Kim Russell (111/1)

- Objects to housing development
- No need for more houses over next 10 years
- Loss of greenspace & network
- Quality of life adversely affected
- Increased traffic, noise, pollution over next 10 yrs.
- Previous plans dismissed by Scottish Government Reporter (2011)

Hilary Millar (112/1)

- Opposed to any remediation and housing development
- Loss of greenspace
- Access & traffic congestion concerns
- Park well used by local community

Mrs Virginia A. Thomson (115/1)

- Unsuitable access & increased traffic congestion (esp. during ongoing works)
- Requirement for new schools
- Loss of greenspace
- Adverse impact on well-being friendly

Alison Grossart (116/1)

- Opposed to housing
- Loss of bio-diversity nature conservation
- Adverse impact on quality of life
- Noise disruption of works over a long time
- Congestion/pollution problems
- Previous plans dismissed by Scottish Government Reporter (2011)
- Support for policy D5 – Protection of Urban Greenspace

Jill Griffiths (119/1)

- Loss of greenspace & nature conservation.
- Not developed for housing
- Alternative solutions to remediation be sought to help properties directly affected.
- Support for policy D5 – Protection of Urban Greenspace and D7.3 –Biodiversity Site

Amy Edmunds (123/1)

- Loss of greenspace & impact on environment,
- Roads, traffic congestion & pollution problems
- Pressure on schools

Robert Taylor (124/1)

- traffic congestion
- local schools at capacity
- impact on local services

- development would not provide social housing
- remediation not possible on quarry site

Margaret Rae (125/1)

- traffic congestion
- pollution
- disruption during construction

Anne B Morrison (128/1)

- loss of greenspace

Giffnock Community Council (131/1)

- M4 conflicts with designation of D5
- loss of greenspace and amenity
- construction would result in temporary loss of green network - policy D4
- construction traffic and severe disruption
- construction creates risk of contamination release
- development creates long term traffic congestion
- development on playing fields would contradict policy D13
- development would disrupt biodiversity - policy D7
- Housing supply is adequate, no need for development
- Support for policy D5 – Protection of Urban Greenspace and D7.3 –Biodiversity Site

The Hutchesons (138/1)

- traffic congestion
- school capacity issues
- pressure on local facilities
- Support for policy D5 – Protection of Urban Greenspace

James Walker (139/1)

- lack of site access
- traffic congestion
- loss of greenspace
- loss of sports pitches
- Support for policy D5 – Protection of Urban Greenspace

W A Philips (141/1)

- impact on local facilities
- school rolls at capacity
- Support for policy D5 – Protection of Urban Greenspace and D7.3 –Biodiversity Site

Allan & Ayako Fanning (142/1)

- local infrastructure couldn't cope
- traffic congestion
- flooding and strain on waste water infrastructure

- construction upheaval

Veronica Sutherland (143/1)

- negative impact on local area

Mrs Elizabeth Logue (144/1)

- negative impact on biodiversity
- traffic congestion
- construction disruption
- Support for policy D5 – Protection of Urban Greenspace

Kenneth & Leonie Cook (145/1)

- loss of greenspace and sports facilities
- loss of biodiversity
- negative impact on local services
- insufficient local school capacity
- Support for policy D5 – Protection of Urban Greenspace

Mrs Eunice A. Johnston (146/1)

- Traffic congestion
- sufficient housing supply, no housing need for Braidbar development
- risk of release of contamination during construction
- loss of greenspace

James Clokey (148/1)

- pressure on school roll
- traffic congestion
- loss of open space and a recreational facility
- Support for policy D5 – Protection of Urban Greenspace

Shirley Tritschler (149/1)

- object to housing
- traffic congestion
- loss of open space
- increase in pollution
- Support for policy D5 – Protection of Urban Greenspace and remediation of quarry for recreational use.

Mrs J G Birnie (151/1)

- loss of greenspace
- overload on local services
- overload on local transport infrastructure

David Christie (152/1)

- there is sufficient land supply for housing
- increased traffic congestion
- Support for policy D5 – Protection of Urban Greenspace and D7.3 –Biodiversity Site

John Connor (154/1)

- pressure on school roll
- pressure on roads/congestion
- pressure on transport infrastructure
- Support for policy D7.3 –Biodiversity Site

Mrs Christine Sharp (155/1)

- risk of release of contamination
- traffic congestion
- pressure on schools
- pressure on medical facilities

Mrs Norma Lynch (156/1)

- traffic congestion
- roads infrastructure insufficient
- impact on school rolls
- loss of green space
- Support for Policy D5 – Protection of Urban Greenspace

Ann Elder (157/1)

- traffic congestion
- air pollution
- disruption during construction work
- pressure on local facilities
- pressure on school roll
- Support for Policy D5 – Protection of Urban Greenspace and D7.3 –Biodiversity Site

Susan Zeitlin (158/1)

- loss of amenity and open space
- traffic congestion
- pressure on school rolls
- Support for Policy D5 – Protection of Urban Greenspace and D7.3 –Biodiversity Site

John Sharp (159/1)

- loss of green space and sports fields
- pressure on local infrastructure

Christine Sharp (160/1)

- loss of sports pitches
- loss of biodiversity
- traffic congestion
- air pollution
- pressure on local services (medical)
- disruption during construction

Ivor Britton & Carole Britton (161/1)

- remediation but not housing development
- pressure on local facilities
- pressure on school roll
- disruption during construction
- sufficient housing supply, no requirement for housing on this site
- traffic congestion

Elaine Tarves (162/1)

- Agree with remediation of quarry but object to housing
- loss of greenspace
- sufficient housing supply, no requirement to build at Braidbar
- disruption during construction
- traffic congestion
- Support for Policy D5 – Protection of Urban Greenspace

Jane R. Zeitlin (163/1)

- Traffic congestion
- loss of Greenspace
- loss of biodiversity

Jackie McGuigan (166/1)

- loss of greenspace an green network
- loss of sports fields
- sufficient housing supply, no requirement to build at Braidbar
- traffic congestion
- pressure on school rolls
- disruption during construction
- air pollution
- Support for Policy D5 – Protection of Urban Greenspace

Patricia Sampaio (167/1)

- previous reporter rejected site in 2011
- loss of biodiversity
- loss of sports pitches if Huntly is developed
- traffic congestion
- air pollution

- pressure on local services
- sufficient housing supply, requirement to build
- would support remediation without housing

Lyndsey Greenshields (168/1)

- traffic congestion

Adam Dawson (169/1)

- threat to protected species (bats)
- disruption during construction
- traffic congestion
- pressure on school rolls
- pressure on local services (medical)
- Reporter rejected site in 2011

Jane Floyd (173/1)

- Risk from contamination
- disruption during construction
- Reporter in 2011 rejected Braidbar as housing site
- lack of clarity on definition of development are within M4 boundary
- The Strategic Environmental Assessment states that it is unable to ascertain the effects M4 will have on the environment. Housing will destroy any of the existing natural habitat on the quarry which may be of considerable ecological value.

Marion Biggin (175/1)

- loss of green space
- loss of sports pitches
- loss of biodiversity
- Support for Policy D5 – Protection of Urban Greenspace

Rena J Findlay (176/1)

- lack of clarity on what area M4 covers
- loss of green space
- loss of biodiversity
- traffic congestion
- disruption during constriction
- Support for Policy D5 – Protection of Urban Greenspace

I J Zeitlin (179/1)

- loss of biodiversity
- traffic congestion
- pressure on infrastructure
- loss of greenspace

Harriet Hannah (180/1)

- risk from contaminated waste
- pressure on local services
- pressure on school roles
- traffic congestion

Rosalind Jamieson (181/1)

- loss of greenspace
- disturbance during congestion
- pressure on local services
- traffic congestion

Malcolm McPherson (182/1)

- Reporter in 2011 rejected this site
- negative impact on local residents
- Support for Policy D5 – Protection of Urban Greenspace and D7.3 –Biodiversity Site

Margaret A. Robb (183/1)

- disruption during construction-
- pressure on local services
- Reporter rejected this site in 2011
- risk of contamination
- loss of biodiversity
- loss of sports pitches
- Support for Policy D7.3 –Biodiversity Site

J Ian Mundell (184/1)

- loss of greenspace
- only support remediation not development
- traffic congestion

Iain McCrimmon (185/1)

- Loss of biodiversity
- site is not viable

James K. Tarves (186/1)

- loss of sports pitches
- pressure on infrastructure
- traffic congestion
- Reporter rejected this site in 2011
- Support for Policy D5 – Protection of Urban Greenspace and D7.3 –Biodiversity Site

J Treagold (187/1)

- loss of biodiversity
- loss of greenspace
- traffic congestion
- risk of contamination

Eric M. Elder (189/1)

- Major upheaval/impact on local environment.
- Major traffic congestion
- Adverse impact on quality of life for years.
- Increased pressure on local infrastructure (schools, health facilities & community amenities)
- Acknowledge remediation but not associated housing development, reinstated area to be used as community/recreation facility)
- Support for Policy D5 – Protection of Urban Greenspace and D7.3-Biodiversity Site

Niall McTeague (190/1)

- Loss of greenspace & nature conservation.
- Major development would have long-term impacts (traffic congestion, air pollution, travel time and road safety concerns)
- Works (remediation & development) would involve years of disruption & pollution.

Gaynor J Paul (191/1)

- risk from contaminated land
- traffic congestion
- sufficient housing land supply, site not required
- loss of biodiversity
- negative impact on climate change
- disruption during construction
- Reporter rejected site in 2011
- Support for Policy D7.3 –Biodiversity Site

Fiona McTeague (192/1)

- traffic congestion
- loss of greenspace

Mr and Mrs Roberston (193/1)

- traffic congestion
- disruption during construction
- pressure on school rolls
- loss of greenspace
- risk from contamination

R W Scott (194/1)

- loss of biodiversity

- traffic congestion
- air pollution
- risk from contaminated land
- sufficient land supply, no requirement to build homes
- disruption during construction
- Reporter rejected site in 2011

Charles Allen (196/1)

- disruption during construction
- pressure on school rolls
- traffic congestion
- Support for Policy D5 – Protection of Urban Greenspace

Tom Mathews (197/1)

- traffic congestion
- pressure on school rolls
- disruption during construction
- loss of sports pitches

Nancy Mathews (198/1)

- traffic congestion
- pressure on school rolls
- disruption during construction
- loss of sports pitches

Alastair Greenshields (199/1)

- traffic congestion
- infrastructure not suitable for construction traffic
- pressure on school roll
- loss of biodiversity
- loss of sports pitches
- loss of greenspace
- threat to protected species (bats)
- disruption during construction
- Reporter rejected site in 2011
- Support for Policy D5 – Protection of Urban Greenspace

Jennifer Greenshields (200/1)

- disruption during construction
- traffic congestion
- risk from contamination
- pressure on school roll
- loss of biodiversity
- loss of greenspace
- loss of sports pitches
- threat to protected species (bats)
- Reporter rejected this site in 2011

J. Campbell (201/1)

- Support for Policy D5 – Protection of Urban Greenspace

Mr and Mrs G. Wyllie (202/1)

- Object to housing
- Support for Policy D5 – Protection of Urban Greenspace
- Object to Policy M4
- Detrimental impact upon residents.

Elaine Brown (204/1)

- Loss of greenspace
- Social space well used by residents for walks & sports.
- Additional housing will place added strain on schools & health facilities.
- Increased traffic flows.
- Damage the environment
- Support for Policy D5 – Protection of Urban Greenspace

Elsbeth Summers (205/1)

- Detrimental impact on area.

Lauren Jarvis (206/1)

- Against remediation to allow housing
- Additional housing would have negative impact on local infrastructure & environment
- Increased traffic congestion
- Concern about release of below surface dangerous toxic chemicals from the old quarry
- Increased congestion pollution
- Loss of greenspace.
- Support potential of tree planting to offset carbon emissions
- Support for Policy D5 – Protection of Urban Greenspace and D7.3 –Biodiversity Site.

George Duncan (209/1)

- Strain on infrastructure (rds., schools & amenities)
- Disruption from heavy works lorries & plant machinery
- Increased traffic on streets not designed for increased volume.

Laura Chalmers (211/1)

- Agree with remediation (making safe) Quarry/Huntly Park
- Against any development on site & surrounding area

David Chalmers (212/1)

- Against any development of quarry site and Huntly park

- Quarry undermined & contains toxic substances.
- Loss of well used greenspace.
- Stress on infrastructure (schools at full capacity)

Martine Macdonald (213/1)

- Against development for housing
- Only developed as a recreational space consistent with policies (D5- Protection of Urban Greenspace) and (D7.3- Biodiversity Site)
- Not sufficient infrastructure to support more housing.
- Previous plans dismissed by Scottish Government Reporter (2011)

Nicola Gallen (214/1)

- Against remediation and any residential development
- No need for additional 300-400 houses
- Local infrastructure cannot cope (schools, traffic congestion & road safety problems)
- Negative impact on quality of life for many years.
- Loss of greenspace.
- Park well-used as a community resource for (sports, health & well-being)

Garry Crosbie (215/1)

- Opposed to remediation and residential development.
- Major traffic congestion & chaos for residents.
- Loss of greenspace & impact of quality of life
- Further consultation needed prior to any final decisions.

Callum McCosh (216/1)

- Opposed to development
- Significant negative impact on area/quality of life.
- Years of disruption & traffic congestion
- Strain on local services
- Safety concerns disturbing contaminants within quarry site.

Paolo Andreuccetti (217/1)

- Opposed to development
- Loss of greenspace
- Increased pollution

Nicola Littlewood (219/1)

- Loss of greenspace
- Health & well-being impacted with loss of park
- Park well used for sports & well-being
- Strain on local services

Janis Thomson (220/1)

- Object to development at Braidbar Quarry/Huntly Park.
- Major access problems
- Loss of greenspace
- Questions marketability of new housing built at quarry site.

Ross MacArthur (222/1)

- No objection to remediation
- Strong objection to housing (400 houses) at site (community recreation area more appropriate)
- Park/sports facilities well used & focal point for community.
- Impact of quality of life.
- Loss of greenspace
- Questions need for housing
- Increased traffic congestion
- Support for Policy D5 – Protection of Urban Greenspace and D7.3 –Biodiversity Site

Jack Connor (223/1)

- Increased traffic congestion

James Platt (224/1)

- Loss of greenspace
- Adverse impact on the environment
- Road junction & traffic congestion problems
- Park well used for sports & general recreation
- Flooding drainage problems

Robert Marshall (225/1)

- Questions competence of company interested in site.
- Concerns on toxic waste within Quarry site and subsequent housing at site
- Loss of greenspace
- Support for Policy D5 – Protection of Urban Greenspace

Anne Marshall (226/1)

- More housing building leads to more traffic congestion.
- Support for Policy D5 – Protection of Urban Greenspace

Tom Cloke (227/1)

- Do not agree with either remediation or redevelopment of site.
- Remediation and redevelopment would have significant negative effect on Quality of life.
- Works would take a long time with associated (noise, traffic & pollution issues).
- Strain on local infrastructure
- Loss of greenspace

- Negative impact on property value
- Previous plans dismissed by Scottish Government Reporter (2011)
- In event remediation is necessary resultant area should be used as community recreation area
- Support for Policy D5 – Protection of Urban Greenspace

Lucille MacKinnon (228/1)

- Object to housing on site
- Traffic congestion/disruption for many years
- Concerned works will have adverse impact on fabric of property.
- Local parking a problem made worse.

Jeanette Whiteside (229/1)

- Negative impact on quality of life/wellbeing of local residents.
- Impact on existing infrastructure (roads) over a lengthy timescale.
- Insufficient infrastructure to cope with development (medical & community facilities)
- Agree with remediation but resultant area be used as a community asset.
- No housing development needed
- Added pollution and impact on health
- Negative impact on property values.

Leslie B Gardner (230/1)

- Object to major housing development
- Access Roads & traffic congestion problems

Mairi Donald (231/1)

- Object to major housing development
- Traffic congestion problems
- Need for new school infrastructure
- Agree with remediation but resultant area be used as a community asset.
- Loss of greenspace/wildlife.

Gillian Esposito (232/1)

- Development would have detrimental impact on local community
- Stress on infrastructure (doctors, schools roads & traffic)
- Agree with remediation but resultant area be used as a community asset.

Peter McGlynn (233/1)

- Object to remediation & housing development
- Impact on quality of lives for years
- Both remediation and development would have major negative impacts (noise, traffic congestion, damage to existing properties).

Michael Shiel (236/1)

- Strongly object to Policy M4 and any development of Braidbar Quarry/Huntly Park.

- Area does not need any more housing
- Essential to have its green space maintained
- The infrastructure can't support any additional housing
- Support for Policy D5 – Protection of Urban Greenspace and D7.3 –Biodiversity Site

Neal Peggs (237/1)

- Object to Policy M4 and any development of Braidbar Quarry.
- Roads in and around Giffnock are already vastly overcrowded
- Building another 400 houses in this area will make driving anywhere almost intolerable and add to the pollution generated in this area.
- The rail service from Giffnock is already oversubscribed at peak periods.
- Policy D5 applies to this area but policy M4 contradicts this by allowing development in the future.
- Development will result in an adverse impact on nature and biodiversity.
- Disturbing all the chemicals lying in this site will also cause issues, not just to nature but to local residents.
- The amount of strain put on local amenities, in particular schools is simply not sustainable.

David Henderson (238/1)

- Object to Policy M4 and any development of Braidbar Quarry/Huntly Park.
- Clear ambiguity and lack of transparency in the description of Huntly Park and what is to be protected. Should include the upper and lower parts of the park.
- Including the park within the delineated boundaries of the Master Plan Area contradicts Policy D5.
- The Council's intentions should be made transparent and free from ambiguity by clearly separating in the Proposals Map (a) the land identified as longer term development opportunity under Policy M4 and (b) the land to be continued to be protected under Policy D5.
- Oppose in principle long term development under Policy M4 on the grounds that such development would have a significant adverse effect on the function of the green network and on the nature conservation/ biodiversity of the landscape character and amenity of the site. The site is identified in the Proposals Map as subject to Policy D7.3 as a biodiversity site. Any development, should the site be remediated, should be limited to a community recreation area.
- Considerable difficulties of access to the site both during any development and following completion.
- The cycle path which currently runs from the main entrance to Huntly Park through the park to Braidpark Drive, thereafter continuing to Muirend Park should be identified and included either within Policy D8.1 core paths or D8.3 strategic cycle corridors.
- The woods at the east end of the upper park, adjacent to the railway line, should be included within the area covered by Policy D7.3.

John Holmes (239/1)

- Object to Policy M4 and any development of Braidbar Quarry/Huntly Park.
- Lack of local infrastructure
- Traffic congestion

- Harm to the environment and bio-diversity
- Previous Scottish Government report rejected such a development, why is this being ignored now?

Sandra Platt (240/1)

- Object to Policy M4 and any development of Braidbar Quarry/Huntly Park.
- Roads are already vastly overcrowded – potholes and breaks in the roadway.
- Drainage in Braidholm Rd is abysmal.
- Use Huntly Park for walking.
- Abundance of wildlife in the area.
- Scottish Government are meant to be trying to save the climate.

Richard Park (241/1)

- Object to Policy M4 and any development of Braidbar Quarry/Huntly Park.
- Development would reduce the local greenspace and outdoor sports facilities.
- Giffnock's outdoor sports facilities are very limited - support improved sport facilities and a new build pavilion in the above area (D5 and 13).

Margaret McKnight (242/1)

- Roads are already vastly overcrowded
- Loss of greenspace and trees
- Work take a long time - large noisy lorry's and building works
- Lot of contaminated waste to be removed.

Maureen Park (243/1)

- Object to Policy M4 and any development of Braidbar Quarry/Huntly Park.
- Development would reduce the local greenspace and outdoor sports facilities.
- Giffnock's outdoor sports facilities are very limited - support improved sport facilities and a new build pavilion in the above area (D5 and 13).

Robin Mair (244/1)

- Object to Policy M4 and any development of Braidbar Quarry/Huntly Park.
- Greatly value the Huntly Park area as a place to visit.
- I recognise that the quarry is fenced off for good reason and the other trees and scrub areas are left "wild" – this to my view is appealing and great haven for wildlife.
- Appreciate there are other green spaces in the Giffnock area but the whole point about these green spaces is that they should be easily accessible to families in the built-up areas.
- Support improvements to the pavilion - some modest investment could help increase recreational usage.
- It is difficult to determine if the council plans remediation for remediation's sake or simply in order to secure housing development.
- The road network around the area is not suited to this scale of construction or future traffic levels.
- Remediation works could take many years and cost taxpayers 10m-£20m.

- Urge the council to consider other courses of action such as doing little or no remediation.
- One course of action to consider is to compensate the current owners of affected properties then simply isolate the quarry area and invest in other areas.

Dr Ronald MacLean (246/1)

- Support protection of Huntly Park under Policy D5.
- Site should continue as open and recreational space
- The Council should be extremely cautious about accepting any future development proposals in this area. Proven success in stabilising safely should be mandatory before any further development is

Jim Kerr (248/1)

- Object to Policy M4 and any development of Braidbar Quarry.
- Support retention of area under Policy D5 as protected open space.
- Against any remedial action. The Braidbar Quarry area site is currently fenced off it is of no danger to the community.
- This could cause environmental damage and potential impact of traffic / equipment.
- If the area is to be made safe / re-established as accessible it should be re-established as a community area and not as housing.
- The infrastructure can support any additional housing.

Marianne Mair (249/1)

- Strongly object to Policy M4 and any development of Braidbar Quarry/Huntly Park.
- Retain the site as protected open space under D5.
- 400 houses would generate a huge increase in traffic flow and air pollution
- The resulting noise, building works, and construction traffic would have a severe negative impact on the quality of life of the local population.
- Green space has positive effects on health and well-being.
- Green space is in short supply in the immediate area.
- Trees and scrubland that provide a haven for wildlife.
- Additional pressure on school capacity and medical facilities
- The present roads network is not suitable for Major remediation works.

Darren Macdonald (251/1)

- Object to Policy M4 and any development of Braidbar Quarry/Huntly Park.
- Retain the site as protected open space under D5.
- If the quarry is to be remediated this should be for recreational use whilst also improving the bio-diversity of the area
- No reason has been stated as to why this area is required for housing development to meet targets.
- Access roads to the Huntly Park area are already congested.
- Construction traffic will cause disruption to the surrounding road network, present a direct threat to road safety and add to pollution.
- Local schools are already at breaking point

Marlies MacLean (252/1)

- Object to the proposed remediation of Braidbar Quarry and to the possible future building of houses.
- Are houses needed if there is a drop in population?
- The road network around the area is not suited to this scale of construction or future traffic levels.
- Counter-productive to remove an area of nature conservation and biodiversity value - important in controlling climate change.
- The proposed remediation will be very costly.

David Stevenson (253/1)

- Object to Policy M4 and any development of Braidbar Quarry.
- Prefer to see this area left untouched but secure.
- Building on this site would result in a significant increase traffic congestion as the road infrastructure is already inadequate.
- Retain the site as protected open space under D5 and D7.3.

Thomas Anderson Whiteside (254/1)

- Agree with remediation on the basis of retaining urban green space - maintain or enhance bio- diversity and nature conservation.
- The infrastructure cannot support any additional housing.
- Deterioration of the quality of life to the surrounding areas due to noise.
- Increase in the areas carbon emissions.
- Not required to meet housing targets.
- Retain the site as protected open space under D5.

Graham Picken (256/1)

- Object to Policy M4
- Retain the site as protected open space under D5.
- Quarry not a viable site for remediation on its own financially.
- Would Huntly park have to be included for proposal to be profitable
- 400 houses to be built in this area would gridlock access roads to main roads which are presently overwhelmed by traffic

Douglas Hegney (257/1)

- The access roads are totally inadequate.
- The local infrastructure, schools, health and leisure are at present overloaded and have no spare capacity.
- Proposal has already been assessed and rejected by the Scottish administration.
- Climate change makes it imperative to protect as many wooded areas as possible.
- Support the remediation of this land and turning into a green area using the grants available for such a task.
- Huntley Park is council owned and the council should have no right to sell this against their wishes loss of football pitches and dog walking area.

Jean Hegney (258/1)

- The access roads are extremely narrow and at the moment cannot cope with the current volumes.
- The local schools are totally overloaded at present and cannot absorb any more pupils.
- The environmental impact of the destruction of a huge area of woodland is totally unacceptable.
- Proposal has already been assessed and rejected by the Scottish administration.
- Support the remediation of this land and turning into a green space for the local community.

Agapitos Patakas (262/1)

- Support the site to be remediated and developed as a community recreation area
- Housing development would destroy the local green space and related biodiversity.
- It is not clear if the development would lead to additional application to build on the surrounding green spaces such as Huntly Park.
- The area does not need any more housing.
- The infrastructure (school, medical, roads, community facilities) cannot support any additional housing
- Traffic impact.
- Increased pollution.

Susan Grant (263/1)

- Object to Policy M4 and any development of Braidbar Quarry/Huntly Park.
- If the area is to be made safe it should be re-established as a nature reserve or community area and not as housing.
- Policy D5 applies to this area but policy M4 contradicts this by allowing development in the future.
- Impact upon outdoor recreation space and green network.
- Need to protect all access routes and paths for sustainable and active travel.
- Lower fields at Huntly Park should have Fields in Trust protection.
- Previous Scottish Government report rejected such a development.
- Remediation would involve the loss of the lower fields of Huntly Park (either temporarily or permanently) and would have a significant effect on the local area during remediation especially in terms of traffic and access to the site.
- Harm to the environment, wildlife and bio-diversity
- The infrastructure (school, medical, roads, community facilities) cannot support any additional housing.

Yi Huei Tsai (264/1)

- Support the site to be remediated and developed as a community recreation area
- Housing development would destroy the local green space and related biodiversity.
- It is not clear if the development would lead to additional application to build on the surrounding green spaces such as Huntly Park.
- The area does not need any more housing.
- The infrastructure (school, medical, roads, and community facilities) cannot support any additional housing.
- Traffic impact.

- Increased pollution.

Roseanne Henderson (265/1)

- Object to Policy M4 and any development of Braidbar Quarry/Huntly Park.
- Retain the site as protected open space under D5.
- Against any remedial action. The Braidbar Quarry area site is currently fenced off it is of no danger to the community. This could cause environmental damage and potential impact of traffic/equipment.
- If the area is to be made safe / re-established as accessible it should be re-established as a community area and not as housing.
- The infrastructure (school, medical, roads, community facilities) cannot support any additional housing.
- Traffic impact.
- Roads are already congested.

Fiona Harkess (266/1)

- Object to Policy M4 and any development of Braidbar Quarry/Huntly Park.
- Area should be kept listed under Policy D7.3.
- Land unsuitable to any type of development as confirmed by Scottish Government Report.
- Need to protect existing green spaces.
- Development should have been directed to land ERC have already sold off for private construction.
- Roads are already congested.
- Schools already oversubscribed and cannot support any additional housing.

Marilyn Keegan (267/1)

- Previous Scottish Government report rejected such a development
- Access roads to the site are unsuitable.
- Schools cannot support any additional housing.
- The loss of lower Huntly Park with its pitches and dedicated dog exercise area would be a disaster.
- The removal of virtually a whole area of natural woodland would be an unmitigated environmental disaster.
- Impact upon house prices.
- Site should be made safe and developed as a green space - accept this would entail a large amount of remedial work.
- Congestion and parking problems.
- Extra pressure on schools.

Mark Robertson (268/1)

- Object to Policy M4 and any development of Braidbar Quarry/Huntly Park.
- Support retention of area under Policy D5 as protected open space.
- Site should be made safe and developed as a Community Recreation Area and not as a new Housing Development.
- Traffic congestion and increased pollution.
- Previous Scottish Government report rejected such a development
- Schools cannot support any additional housing.

- Impact upon the environment and wildlife.

Ian Crowther (270/1)

- The infrastructure cannot support any additional housing.
- Both local primary schools are at capacity. New houses will increase pressure on schools.
- Roads are already congested.
- There isn't the road network to support all these cars from new houses.
- Increased pollution.
- Impact upon the environment and endangered and protected species.
- Impact upon people's physical and mental health – loss of open space/recreation area.

Gordon Wilton (272/1)

- Previous plans dismissed by Scottish Government Reporter (2011) on grounds of probability of serious effects of development which would greatly outweigh benefits.
- Negative impacts would be greater given the increased scale of the site.
- If site remediated it should be developed as a community recreational area not for housing, which would also adversely affect bio-diversity/nature conservation under policy D7.3
- Adverse impact on quality of life & loss of recreational space.
- Building works & noise would cause traffic/pollution problems affecting the amenity of Giffnock.

Sharon Shiel (275/1)

- Loss of greenspace (associated with SMIR04 and CS014)
- More housing would create more congestion and reduce quality of life.
- Support for Policy D5 – Protection of Urban Greenspace and D7.3 –Biodiversity Site

Alison Lee (278/1)

- Object to housing on Huntly Park/Braidbar Quarry.
- Adverse impact on well-being, wildlife & biodiversity.
- Housing would increase carbon levels.
- Adverse impact on local amenities, schools, roads & traffic.
- Site is a precious greenspace resource.

Keith Dale (280/1)

- Support for Policy D5 – Protection of Urban Greenspace and D7.3 –Biodiversity

Lucy Dornan (284/1)

- Loss of greenspace & impact on well-being
- Negative impact on health & outdoor lifestyles.
- If site remediated best used as a recreational area/nature reserve
- Access & traffic congestion problems
- Concerned about impact on Giffnock infrastructure (including medical) & amenities.

- Local schools could not cope.
- Years of disruption locally.

Morag Peggs (286/1)

- Object to development at Braidbar Quarry.
- Would be an unacceptable burden on population in and around Giffnock.
- Major road traffic congestion.
- Especially concerned with tendency to build higher density/high rise which exacerbates problems.
- Apart from work commuting (local relatively wealthy population does not use public transport).
- Rail system is at capacity.
- Concerns about disturbing chemicals lying in the site and the track record of the company with an interest in the site.
- Strain on local facilities is not sustainable, especially schools.
- Loss of greenspace.
- Detract from standard of living of population
- The park area is of importance for biodiversity.
- Local residents have consistently been opposed to development at the site.
- Designation of Policy M4 at the site is considered contradictory to Policy D5 as development would fail all of the criteria listed within Policy D5:-
- Development at Braidbar would have a massive adverse impact on nature conservation and biodiversity
- Development would adversely affect recreation, amenity and landscape function of the area.
- Mitigation could not adequately replace/substitute for existing biodiversity assets.

Stephen Doherty (308/1)

- Road junction problems especially at Braidbar Road/ May Terrace
- Any proposals should undertake a traffic transport assessment and redesign the junction at A77.
- Housing development would be subject of an Environmental Impact Assessment especially given the dumping of unknown mineral deposits at the site.
- Nature conservation (birds of prey) present on the site
- Understand the requirement to secure the safety aspect of the quarry.
- Lower Huntly Park playing fields and adjacent woodland be clarified as 'common good' and not proposed for residential development.

Dr Paul Deehan (311/1)

- Impact on local environment (notably wildlife, bats, owls, rare species of toads & orchids).
- Concerns about removal of large quantities of water within caverns which will disturb volatile trace elements.
- Considerable number of houses (400) will create access & congestion problems.
- Already stretched public service infrastructure will be further overstretched especially schooling & NHS services (e.g.GP surgeries).

Robert McDonald (314/1)

- Opposed to housing development at Huntly Park/Braidbar Quarry area.
- No need for more housing to the detriment of residents.
- Infrastructure cannot support hundreds of houses.
- Increased congestion.
- Development would spoil the local environment.
- Make area safe and let nature thrive to benefit all.
- Support for Policy D5 – Protection of Urban Greenspace.

Mary Kerr (336/1)

- Against remediation as quarry fenced off and no danger to community.
- Remedial action could cause environmental damage (especially draining water currently filling caverns.)
- Risk to surrounding housing through polluted water being allowed to spread into water courses.
- Environmental pollution of air & ground if remediation not carried out properly.
- If area is to be remediated/made safe site should be re-established as a community space.
- Huntly Park should be protected as it's a (King George V) park.
- Object/against housing at the site
- Traffic in construction phase
- Impact on local infrastructure (roads, schools, community facilities)
- The loss of any "village" aspect in the community
- The serious effects of the remediation and development greatly outweighs the benefit

Ruth Levey (337/1)

- Support for Policy D5 – Protection of Urban Greenspace

Elizabeth Somerville (354/1)

- Remediation and development of this site for housing would have a detrimental impact.
- There would be major disruption for many years.
- No viable road infrastructure to access this site (especially heavy machinery)
- Pollution generated (noise, co2 emissions, light) would have negative impact on area.
- Up to 400 houses would put significant pressure on schools, medical facilities and roads.
- Major increase in cars in this area would cause serious congestion on the surrounding roads.
- Area should be developed as an urban park to encourage wildlife and nature conservation
- Housing development would destroy existing established wildlife.
- Housing not required to fulfil need.
- Previous plans dismissed by Scottish Government Reporter (2011)
- Support for Policy D5 – Protection of Urban Greenspace

Philippa Mayes (355/1)

- Huntly park and the surrounding woods to be retained as green space as appreciated and well used by children, dog walkers, runners etc.
- Park is vital part of life and essential to health & wellbeing.
- Support remediation where ground deemed unsafe.
- Council should look beyond commercial means to finance this or protect Huntly Park within a wider development.
- Top half Huntly park protected by legal bond with 'Fields in Trust', believes lower field should have a similar legal status. This would keep area safe from development.

Agnes Jamieson (360/1)

- Catastrophic effect on greenspace, nature conservation and wider green network.
- Concerned development of quarry site would lead to further applications on Huntly Park & surrounds.
- No requirement for 300-400 houses over next 10 years.
- Infrastructure insufficient to support major development in particular access roads.
- Schools are at full capacity as are medical & community facilities.
- Noise, building works, severe congestion intolerable for residents with serious impact on quality of life
- Length of time and logistics of safely removing contaminated materials is of great concern
- Scottish Government reporter (2011) rejected remediation/development of quarry on grounds on the probable serious effects of development would outweigh benefits.
- Concerns about competence and track record of company interested in site.
- Totally against development given the considerable timescale, pollution, congestion, hazards and access problems.
- Destruction of nature conservation & removal of much needed sports facilities, resulting in a detrimental impact on Giffnock.

Keir Jamieson (362/1)

- Catastrophic effect on greenspace, nature conservation and wider green network.
- Concerned development of quarry site would lead to further applications on Huntly Park & surrounds.
- No requirement for 300-400 houses over next 10 years.
- Infrastructure insufficient to support major development in particular access roads.
- Schools are at full capacity as are medical & community facilities.
- Noise, building works, severe congestion intolerable for residents with serious impact on quality of life
- Length of time and logistics of safely removing contaminated materials is of great concern
- Scottish Government reporter (2011) rejected remediation/development of quarry on grounds on the probable serious effects of development would outweigh benefits.
- Concerns about competence and track record of company interested in site.
- Totally against development given the considerable timescale, pollution, congestion, hazards and access problems.

- Destruction of nature conservation & removal of much needed sports facilities, resulting in a detrimental impact on Giffnock.
- Support for Policy D5 – Protection of Urban Greenspace and D7.3 –Biodiversity Site

Catherine Somerville (371/1)

- Remediation and development of this site for housing would have a detrimental impact.
- There would be major disruption for many years.
- No viable road infrastructure to access this site (especially heavy machinery)
- Pollution generated (noise, co2 emissions, light) would have negative impact on area.
- Up to 400 houses would put significant pressure on schools, medical facilities and roads.
- Major increase in cars in this area would cause serious congestion on the surrounding roads.
- Area should be developed as an urban park to encourage wildlife and nature conservation
- Housing development would destroy existing established wildlife.
- Housing not required to fulfil need.
- Previous plans dismissed by Scottish Government Reporter (2011)

Andrew & Marie Carey (375/1)

- Greenspace should be preserved. (References Community Council Survey- 85% want quarry left alone)
- Briadbar considered multiuser facility which provides Community, leisure and sports facilities
- LDP2 should take note of Community Council survey and preserve greenspace.
- Removal & dispersal of noxious/odious chemicals will impact on both residents & recreational users.
- Result in cycle path being closed & restrictions for dog walkers.
- Further housing would not fit Council's aim to reduce adverse impact on soils.
- Major access issues, local infrastructure not able to support demand for access roads, traffic controls, schools, health & civic services & shops etc.
- Concerns about competence and track record of company interested in site
- Local wildlife adversely affected.

Colin MacCallum (377/1)

- Development would be detrimental to the local area (loss of greenspace & increase in traffic)
- Concerns about likely access (Church Rd not appropriate given weak bridge over railway)
- If access taken either around (Cunningham/Whitton Drive or Braidbar Rd) this would create traffic bottleneck junction at Fenwick Road.
- Additional houses would have a big impact on local school facilities & demand for rail services.
- Has Council fully investigated effects on drainage & local water courses?
- Park prone to waterlogging, if built on this would be dispersed elsewhere.

- Previous plans to remediate were rejected, given potential serious effects would outweigh benefits. Therefore why is this site being considered again?

Dr Colin M Tait (381/1)

- Preservation of ever decreasing urban green space for community use
- Preservation of an area of nature conservation and biodiversity
- Gross over development in an already heavily developed area
- Already stretched provision for schools, medical services and water and sewage services
- Potential for 600-800 extra cars in the area which is already grossly congested and polluted
- Lack of adequate access for development and certainty of many years of traffic disruption, noise and heavy extra diesel pollution for local residents
- Support for Policy D5 – Protection of Urban Greenspace and D7.3 –Biodiversity Site

Mrs Elizabeth Tait (383/1)

- During remedial process, this would release large quantities of toxic fluids within the quarry which represents a significant health hazard.
- Increased fuel diesel, noise pollution serious especially during remedial & building process.
- No suitable access to this site.
- Development would create unacceptable overload on infrastructure.
- Main Street Giffnock, already a bottleneck, potential for 400 more houses and associated vehicles would cause serious congestion problems.
- Already poor condition of roads/pavement would be worsened.
- Local schools, services & amenities would be stretched beyond limits.
- Huntly Park well used for sport & recreation (as King George V Park)
- No alternative areas for children to use without being driven hence increasing pollution.
- This is a popular local amenity which would be greatly missed with no benefit to local people.

Laura Wiggins (385/1)

- Do not support any proposal for development of Braidbar Quarry or Huntly Park.
- Remediation cannot be achieved without extensive building.
- Past remediation proposals required substantial disruption, with heavy Lorries on small restricted routes.
- Well used/treasured resource which should be preserved for the community.
- This greenspace is important for health and well-being.
- Support for Policy D5 – Protection of Urban Greenspace

Sheila Watson (386/1)

- Loss of public playing park used for housing.
- Loss of greenspace runs counter to environmental crisis and obesity problems.
- Many brown sites which could be developed in preference to public parks.

Laura Charles (387/1)

- Support remediation but not housing development
- Area needs to be made safe but not to the detriment of local community & greenspaces
- Remediated area could be used as community recreation area.
- Housing development would have significant impact on greenspace
- Park well used with numerous sporting facilities which would be lost.
- Insufficient infrastructure to support housing/impact on schools & increased traffic congestion.
- Increased pollution and cause poor air quality.
- Adverse impact on quality of life.
- Scottish Government reporter (2011) rejected remediation/development of quarry on grounds on the probable serious effects of development would outweigh benefits.

James Bone (388/1)

- Favour remediation, but should not be linked to housing.
- Main concerns traffic congestion & pollution.
- Site poorly serviced by access roads
- Loss of greenspace, wooded area and wildlife habitat

Richard Wallis (389/1)

- Concerns on infrastructure required to support development
- Access concerns traffic congestion considerable (both during & after construction)
- Schools do not have the capacity for such development
- Environmental issues, during remediation with release of dangerous toxins into the water table & atmosphere.
- Concerns about material underground within the quarry and any associated transportation of this.
- Scottish Government reporter (2011) rejected remediation/development of quarry on grounds on the probable serious effects of development would outweigh benefits.

Raffaele Esposito (390/1)

- Against any residential development within the boundaries of quarry.
- Should be preserved as greenspace.

John Charles (391/1)

- Agree with remediation of quarry/Huntly Park but strongly against housing development after remediation.
- Remediation should not be done to the detriment of local community and eradication of greenspaces.
- Remediated Area should be considered as a community recreation area
- Loss of greenspace, Huntly park well utilised by families with sporting events etc
- Park well used as an afterschool resource.
- Not sufficient infrastructure to support (300-400) new houses.
- Access roads unable to cope with additional building works.

- Development would cause pollution, congestion noise and impact on access & open space.
- Quality of life adversely affected.
- Scottish Government reporter (2011) rejected remediation/development of quarry on grounds on the probable serious effects of development would outweigh benefits.

James Ian Mundell (392/1)

- Enjoy existing park & playing fields and adjacent fully established woods which provides an ideal habitat for wildlife.
- Area also provides an important wildlife corridor to other wildlife areas

Brian Letham (393/1)

- Object to any long-term development of Braidbar Quarry/Huntly Park.
- Remediation of land is main technical difficulty which has proven not to be viable.
- Similar examples of remediated land, with similar material, have not been remediated to a standard suitable for dwelling houses. (Only being suitable for commercial use)
- Not convinced remediation to a technically acceptable level can be achieved.
- Cites example of housing on edge of quarry which cannot secure mortgages given conditions.

Katie McGuire (395/1)

- Object to the proposed changes which will be made to Huntly Park building new developments and destroying our green space.

Alex O'Hara (398/1)

- Undesirable and should not be allowed
- Would cause traffic chaos, development would make things worse.
- Loss of greenspace
- Area should be protected to help climate change.
- Braidbar quarry deemed a toxic wasteland and should not be disturbed
- Health concerns

W Pollock (399/1)

- No need for an area of major housing development.
- Area should remain as urban greenspace/bio-diversity & nature conservation area.
- Support for Policy D5 – Protection of Urban Greenspace

Clare Pollock (401/1)

- This park should be left as it is for the benefit of users of outdoor spaces. This is the second attempt in recent years by ERC to try to build on greenspace in Huntly Park.

Raymond Sweeney (403/1)

- Reject the re-development of the Braidbar Quarry site for the purposes of building new housing and/or commercial purposes.
- Loss of well-used local green space would be devastating for the local environment.
- Additional pressure on local services such as schools which already operate at full or over capacity

Robert Squair (404/1)

- Loss of greenspace -Huntly Park is an integral part of the local community and used by all generations for sport and recreation.
- Braidbar Quarry woodland is an important natural resource in the urban environment.
- Quarry is already fenced off and clearly marked as unsafe to walk on. Therefore, no future remediation is required.
- There are other brownfield sites in East Renfrewshire which housing could be built on, rather than on historic park.
- Infrastructure and access points to the park are limited for vehicular traffic (weak railway bridge)

Susan Brydie (405/1)

- Object development Huntly Park & Braidbar quarry.
- Loss of greenspace (encroachment with detrimental effects from waste/contamination/water from mines.
- Road system would struggle to cope with new housing, major traffic congestion & access difficulties.
- Excess pressure on schools in Giffnock
- Retain greenspace for future generations (especially with obesity problems, sedentary lifestyles)
- Detrimental to nature conservation/wildlife
- Park well used by whole community
- Not averse to quarry remediated provided greenspace kept as greenspace for community, not for housing.

William Martin (406/1)

- Object to housing at site.
- Support remediation but should not be linked to housing.
- Object to Huntly Park being included within M4 policy outline which should only cover quarry site.
- Remediation process considered dangerous & risky exercise for residents surrounding the site, appropriate mitigation should be in place.
- If housing linked to remediation profit margin of developers would put process at risk.
- Housing not required to meet needs.
- Any plan to develop land would create unnecessary risks
- Long-term adverse impact on quality of life
- Severe strain on infrastructure (traffic, schools. Community facilities)

Mairead Fernandez McCann (407/1)

- Object to additional 400 households.
- Pressure on local schools including early year's provision.
- Pressures on transport system (quality & service).
- Special scientific interest will be distributed through the building programme. Bird nesting will be disrupted as well as the fox and red squirrel population.
- Roads - local roads were not built to support the traffic from 400 households
- Social care – Increasing demand on social care due to a rise in older proportion of and the onset of health related issues arising from an ageing population. Long term care - East Renfrewshire has the fourth highest proportion of population in Scotland with one or more long-term health conditions.
- Significant strain on local health services.

Wendy Wallis (410/1)

- Object to remediation and subsequent housing development
- Concerns on demand on infrastructure & risks to environment.
- Access concerns via (church rd. /Huntly Ave) would cause significant issues (congestion/parking & narrowness of church rd.)
- Already significant congestion problems
- 400 additional housing will add to existing (primary & secondary school) pressures which are already at full capacity.
- Remediation a substantial task with unknown underground toxic materials with significant impact on water table & atmosphere.
- Scottish Government reporter (2011) rejected remediation/development of quarry

W. P. Edmondson (413/1)

- Reporter previously rejected the site
- loss of biodiversity
- risks from contaminated land
- risk to neighbouring property during construction
- Local infrastructure not able to cope with additional development.

Fabizio Ventisei (414/1)

- Reporter previously rejected the site
- loss of biodiversity
- loss of greenspace
- loss of sports facilities
- there is adequate housing supply
- local infrastructure would not cope: roads, schools, healthcare
- disruption during construction work
- increased traffic congestion and lower air quality
- Support for Policy D5 – Protection of Urban Greenspace and remediation for community open space

Scott & Emma Yuill (416/1)

- loss of biodiversity
- local infrastructure unable to cope:- schools, roads

- disruption during the construction phase
- increase in traffic congestion
- Reporter previously rejected the site

Margaret C. Cameron (417/1)

- local services unable to cope:-schools, roads
- loss of biodiversity
- support remediation for use as public open space - Policy D5 – Protection of Urban Greenspace

Sandra Paterson (418/1)

- Support for Policy D5 – Protection of Urban Greenspace

John W. Clingan (419/1)

- increased traffic congestion disruption during construction
- Support for Policy D5 – Protection of Urban Greenspace and D7.3 Biodiversity Site

Lynn Bale (420/1)

- loss of recreational open space
- loss of biodiversity
- Reporter had previously rejected this site
- disruption during construction
- risk from contaminated land
- Support for Policy D5 – Protection of Urban Greenspace and D7.3 –Biodiversity Site

A E. Lancaster (422/1)

- Reporter previously rejected this site
- disruption during construction
- increase in traffic congestion
- risk from contaminated land

Alastair Bale (423/1)

- loss of biodiversity
- Reporter previously rejected the site
- local facilities under pressure: schools, roads
- Support for Policy D5 – Protection of Urban Greenspace and D7.3 –Biodiversity Site

Andrew Yates (425/1)

- loss of biodiversity
- loss of disruption during construction phase
- risk form contaminated land
- increase in traffic congestion
- school rolls at capacity

- medical facilities at capacity
- Support for Policy D7.3 –Biodiversity Site and remediation of site for community use

Jean Taylor (427/1)

- risk from contaminated waste
- pressure on school rolls
- increase in traffic congestion
- loss of greenspace

Jackson Carlaw MSP (428/1)

- pressure on school roll
- increasing traffic congestion
- pressure on healthcare facilities
- risk from contaminated land
- Support for remediation to Community greenspace if this is feasible

Sylvia M. Gordon (429/1)

- increase in traffic congestion
- loss of recreational green space

Andrew & Rita Keane (430/1)

- pressure on local schools
- increase in traffic

Nick Treadgold (431/1)

- loss of recreational open space
- loss of biodiversity
- increase in traffic congestion
- sufficient land supply elsewhere

Robert Harrison (432/1)

- sufficient land supply without this site
- loss of biodiversity
- reporter rejected this site in 2011
- increase in traffic congestion
- Support for Policy D5 – Protection of Urban Greenspace

Mrs Joan Marion Adams (433/1)

- risk from contaminated land
- Reporter rejected site in 2011
- loss of sports facilities
- Support for Policy D5 – Protection of Urban Greenspace and D7.3 –Biodiversity Site

A Hunter (434/1)

- risk from contaminated land
- pressure on school rolls
- increase in traffic congestion
- Reporter rejected this site in 2011
- Support for Policy D7.3 –Biodiversity Site

C Barr (435/1)

- Strongly opposed to remediation of quarry & Huntly Park.
- Against residential development of site.
- Probable serious effects of development would greatly outweigh potential benefits.
- Development of 300-400 houses would impact greatly on environment.
- Advocates area be developed as a community area.

Allan & Irene McNeilage (436/1)

- loss of recreational open space
- disruption during construction
- increase in traffic congestion
- pressure on school rolls

Graham D Paul (438/1)

- loss of biodiversity
- risk from contaminated land
- increase in traffic congestion
- disruption during
- Reporter rejected this site in 2011
- Support for Policy D7.3 –Biodiversity Site

Brendan Harris (439/1)

- reporter rejected this site in 2011
- Support for Policy D5 – Protection of Urban Greenspace and D7.3 –Biodiversity Site

Laura & Alice van den Akker (440/1)

- loss of recreational open space
- loss of biodiversity
- increase in air pollution

Patricia Riddell (441/1)

- pressure on school rolls
- pressure on medical facilities
- increase in traffic congestion
- sufficient land supply
- risk from contaminated land

Patricia M. Doran (443/1)

- increase in traffic congesting
- pressure on school rolls
- risk from contaminated land
- loss of biodiversity
- increase in air pollution
- Support for Policy D5 – Protection of Urban Greenspace and D7.3 –Biodiversity Site

Paul Drury (444/1)

- loss of biodiversity
- loss of greenspace
- increase in traffic congestion
- pressure on school rolls
- disruption during construction
- risk from contaminated land
- increase in air pollution

Moira Harris (445/1)

- sufficient housing supply
- traffic congestion
- reporter rejected the site in 2011
- Support for Policy D5 – Protection of Urban Greenspace and D7.3 –Biodiversity Site

Scot & Elaine van den Akker (446/1)

- risk from contaminated land
- loss of biodiversity
- loss of green space
- pressure on school rolls
- pressure on healthcare
- increase in traffic congestion
- Support for Policy D5 – Protection of Urban Greenspace

Friends of Huntly Park (448/1)

- disruption during construction
- quarry should be remediated for use as public space
- loss of biodiversity
- loss of greenspace
- sufficed land supply for housing
- loss of sports facilities at Huntly
- increase in traffic congestion
- lack of clarity in LDP" plans
- reporter rejected site in 2011

Iain Biggin (449/1)

- disruption during construction
- pressure on local facilities
- Reporter rejected the site in 2011
- sufficient housing land supply

F Greene (455/1)

- risk from contaminated land
- loss of biodiversity
- increase in traffic congestion
- decline in house prices

Dr Paul Greig (456/1)

- loss of biodiversity
- reporter rejected the site in 2011
- risk of contaminated land
- Support for Policy D4 – Green Networks and Infrastructure, D5 – Protection of Urban Greenspace and D7.3 –Biodiversity Site

Mary MacCallum (468/1)

- LDP does not clearly delineate the boundary of Huntly park- concerned that the whole park has been included under Policy M4 mapping - the playing fields at the upper level are protected as a George V playing field.
- Whole area has been correctly designated within D5 and D7.3 and provides a valuable green space to the local community.
- Quarry does represent a danger, however, it has been well fenced off and provides a safe habitat for local wildlife encouraging biodiversity. Any development of the quarry site would be detrimental to the local community.

Andrew Morley (469/1)

- loss of greenspace and resulting knock on impact to physical/mental well being
- increased traffic on church road
- pressure on school roles
- pressure on local facilities

Heather Hughes (479/1)

- Object to the LDP2 proposal to remediate Braidbar Quarry with proposed development.
- Support remediation of Braidbar Quarry, but only if the land is left as greenspace.
- Important greenspace is for our health and wellbeing and for future generations to enjoy.

Shirley Wallace (481/1)

- Oppose the intention to remediate and develop Braidpark Quarry and Huntly Park.

- Plan will cause major disruption to the infrastructure of the local area.
- Will place extensive pressure on already stretched amenities such as local schools, car parking and health care facilities.
- Public transport services already inadequate - with standing room only on most modes of transport at peak times and insufficient car parking at Giffnock train station.
- It will have a detrimental effect on the bio diversity and nature conservation of the area- wild flowers, wild birds and bats.
- Huntly Park is a much treasured area of urban green space - facility for dog walking and also a safe place for our children to play outdoors.
- With growing concern about childhood obesity we should be encouraging outdoor play and exercise, we need our park to provide this!

G Muir (483/1)

- Strongly object to building on Huntly park, or any park for that matter.

Derek Duncan 485/1

- reporter rejected the site in 2011
- disruption during construction/remediation
- worse air quality
- risk from contaminated land
- roads unsuitable
- loss of biodiversity
- disruption to Sustrans paths/public access
- adequate housing supply
- local facilities can't open
- sports pitches must be protected

Issue 7	Placemaking and Design	
Development plan reference:	Policy D1: Placemaking and Design Policy D1.1: Extensions and Alterations to Existing Buildings for Residential Purposes	Reporter: Alison Kirkwood
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Sportscotland (7/3) Mr and Mrs Kerr (171/2) Scottish Natural Heritage (178/3) Persimmon Homes (397/1) Miller Homes (463/2) Cala Homes West (464/3) Homes for Scotland (476/8) (476/9) Wallace Land Investments (489/4) Robertson Homes (495/2) Avant Homes (504/3)</p>		
Provision of the development plan to which the issue relates:	Section 3: Creating Sustainable Places and Communities Pages 50 to 54	
Planning authority's summary of the representation(s):		
<p><u>(a) Policy D1: Placemaking and Design</u></p> <p><u>Support</u></p> <p><u>Sportscotland (7/3)</u></p> <ul style="list-style-type: none"> • Policy welcomed as it seeks to protect and improve spaces which provide opportunities to participate in sport, recreation and have responsible access. <p><u>Scottish Natural Heritage (178/3)</u></p> <ul style="list-style-type: none"> • Strongly support this policy and the intention to prepare Placemaking and Design Supplementary Guidance. <p><u>Objections</u></p> <p><u>Mr and Mrs Kerr (171/2)</u></p> <ul style="list-style-type: none"> • 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". • 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.

Scottish Natural Heritage (178/3)

- 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), Cala Homes West (464/3), 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

Mr and Mrs Kerr (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), Cala Homes West (464/3), 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), Scottish Natural Heritage (178/3)

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

Objections

Mr and Mrs Kerr (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), Cala Homes West (464/3), 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), Cala Homes West (464/3), 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/68) and Designing Streets policies (CD/75).
- 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 opposed to the substantial removal of 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 20) 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:

Policy D1: Placemaking and Design

General

1. I note that SportScotland supports policy D1 and does not require any changes to the wording of the policy. I also note that Scottish Natural Heritage (now NatureScot) strongly supports this policy.

Criterion 2

2. I agree with NatureScot that adding the word “layout” to criterion 2 would be appropriate, aligning with the proposed plan’s placemaking objectives and those set out in the Scottish Government’s ‘Scottish Planning Policy’ document. A slight modification to criterion 2 is therefore recommended.

Criterion 6

3. The inclusion of the words “where possible” would be superfluous. The introductory wording in proposed policy D1 states that proposals should demonstrate that the listed criteria have been considered, and where appropriate, met. This provides the context for an applicant to justify why it would not be possible for a proposal to “respond to and complement site topography”, if applicable. No modification is proposed to address this point.

4. I note that policy 8 in Clydeplan (2017) includes the criterion “the development will not undermine green belt objectives”. However, I do not consider it necessary for this wording to be replicated in policy D1 in the proposed local development plan. Policy SG1 in the proposed LDP (housing supply, delivery and phasing) requires policy 8 in Clydeplan to be applied where housing is proposed to meet a shortfall in the effective land supply. A requirement not to undermine green belt objectives would come into play in that instance.

5. Policy D1 in the proposed LDP applies to all types of development, not just housing proposals. It sets out the overall expectations of the council in terms of standards of placemaking and design. Within this context, I consider that the use of the term “not impact adversely” in relation to the green belt and other built and natural heritage features is appropriate. A more detailed explanation of what this term means in relation to a particular designation can be found in the relevant specific policy, for example policy D3: Green Belt and Countryside around Towns and policy D4: Green Networks and Infrastructure. Therefore, I find no reason to delete the words “not impact adversely” from this criterion.

6. I agree with NatureScot that reference to landscape setting in criterion 6 would be appropriate, aligning with the proposed plan’s placemaking objectives and those stated within Scottish Planning Policy. A slight modification to criterion 6 is therefore recommended.

Criterion 12

7. The statement in paragraph 265 of Scottish Planning Policy that “land raising should only be considered in exceptional circumstances” relates to managing flood risk and drainage. The implications of land raising in terms of flooding is addressed in the proposed plan in policy E7 (flooding).

8. The reference to land raising in criterion 12 of policy D1 appears to relate only to landscape and amenity impacts. The council and objectors are in agreement that there may be circumstances where some land raising is required as part of a development proposal. Within this context, I consider that the wording of the first sentence of criterion 12 is overly restrictive in that it implies that any proposal, which involves even a limited amount of land raising, would not be supported. A slight change to allow land raising where justified is, therefore, recommended.

9. The second sentence is considered relevant to ensure proposals address potential impacts on the local landscape and amenity. Given the positive contribution that visual and physical connections make to creating a sense of place, I consider that that any adverse impact should be resisted. The introduction of the words “are demonstrated to have significant adverse impact” would weaken this criterion and the suggested change is therefore not appropriate. No further modifications to criterion 12 are recommended.

Criterion 13

10. The supporting text for policy D1 on pages 48 – 51 of the proposed plan highlights the priority given to good design and the protection and enhancement of the built and natural environment. I do not consider that backland development would be compatible with this priority or the six qualities of a successful place. Its inclusion as a separate criterion in policy D1 sets out clearly the council’s position on this form of development, which I consider helpful to avoid any ambiguity. The deletion of this criterion is not justified.

Policy D1.1: Extensions and Alterations to Existing Buildings for Residential Purposes

11. Policies D1.1 and D1.2 (residential sub-division and replacement) set out criteria for assessing proposals to extend or alter existing buildings for residential purposes and to subdivide or replace residential properties. Supporting information is provided in the first three paragraphs on page 54 in the proposed plan.

12. The fourth paragraph introduces an additional concern regarding the loss of smaller and more affordable housing stock and the resultant implications on education infrastructure. Whilst not directly relevant to policies D1.1 and D1.2, I note that the council considers it appropriate to raise this issue in this section of the plan, as well as in the Development Strategy and section on “Education Infrastructure”. On this basis, I can see no reason to recommend the removal of this paragraph in its entirety.

13. However, it does include, what I consider to be, a policy statement, that “proposals for extensions to such properties and replacement dwellings will be strictly controlled”. No explanation is provided in the plan as to where, when or how this statement would be applied to proposals for extensions and replacement dwellings. Furthermore it is not included in the criteria listed in policies D1.1 and D1.2. I therefore consider that this sentence should be deleted. A slight modification is recommended.

Reporter's recommendations:

Modify the proposed local development plan by:

1. Adding the word "layout" to criterion 2 of policy D1 on page 52 to read as follows:

"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...".

2. Adding the word "setting" to criterion 6 of policy D1 on page 52 to read as follows:

"Respond to and complement site topography and not impact adversely upon the green belt, landscape character and setting, green networks...".

3. Deleting the first sentence of criterion 12 of policy D1 on page 53 and replacing it with the following sentence:

"Unless justified, there will be a general presumption against landraising."

4. Deleting the following sentence from the fourth paragraph of the supporting text on page 54:

"Proposals for extensions to such properties and replacement dwellings will be strictly controlled."

Issue 8	Green Belt	
Development plan reference:	Policy D3: Green Belt and Countryside around Towns (CAT) Policy D3.3: New Build Housing	Reporter: Alasdair Edwards
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>David Williamson (117/1) Mr and Mrs Kerr (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 (503/4) (503/6) (571/5) (571/6) Avant Homes (504/6)</p>		
Provision of the development plan to which the issue relates:	Section 3: Creating Sustainable Places and Communities Page 56 to 59 Supporting Documents: <ul style="list-style-type: none"> • Green Belt Landscape Character Assessment Background Report (BR2) 	
Planning authority's summary of the representation(s):		
<p><u>(a) Policy D3: Green Belt and Countryside around Towns (CAT)</u></p> <p><u>Support</u></p> <p><u>Woodland Trust Scotland (376/2)</u></p> <ul style="list-style-type: none"> • Support policy. <p><u>Objections</u></p> <p><u>Mr and Mrs Kerr (171/1)</u></p> <ul style="list-style-type: none"> • Objection to green belt boundary dissecting garden curtilage at number 379 Glasgow Road, Waterfoot. • Seek confirmation of boundary of green belt. <p><u>Scottish Natural Heritage (178/4)</u></p> <ul style="list-style-type: none"> • 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.

- Welcome the Green Belt LCA background report. Strongly support the recommendations to improve defensibility of the Green Belt boundary, setting of settlements and accessibility to Green Belt and green networks. Clarification could be provided on the mechanism which will be applied to ensure that these recommendations are implemented.

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 (503/4) (571/5)

- 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.
- 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 (503/6) (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 (503/6) (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

Mr and Mrs Kerr (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 and CD/43.

- 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.
- BR2 summarises the Green Belt Landscape Character Assessment methodology and results (CD/42a) (CD/42b). This document has informed the strategic approach taken for LDP2, Policy D3 and will be used to assist with the assessment of future planning applications.
- 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 (503/4),(571/5)

- Modifications were sought to the proposed plan 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/68) 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/80) 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 Local Development Plan (LDP1) (CD/01) 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/05).
- 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 and the Green Belt Landscape Character Assessment Background Report (BR2) (CD/26).
- 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 2nd 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/20) were assessed in detail to see the appropriateness of each site. The site selection process is set out in the Site Evaluation (CD/34) 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 (503/6) (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:Policy D3 (green belt and countryside around towns)

1. A green belt review was carried out for East Renfrewshire in 2002 in advance of the East Renfrewshire Local Plan (2003). This study surveyed the entire length of the inner green belt boundary and allowed the release of green belt for urban expansion at Barrhead and Newton Mearns. A further green belt review was completed in 2008 to inform a replacement local plan (adopted 2011), resulting in a few minor boundary changes. The adopted East Renfrewshire Local Development Plan (2015) states that the council undertook a further green belt review to inform that plan. It was necessary at that time to release further land from the green belt in Barrhead and Newton Mearns to meet housing need.
2. In advance of the preparation of the proposed East Renfrewshire Local Development Plan 2, the 'East Renfrewshire Greenbelt Landscape Character Assessment Update' (2016) was published. In its introduction, the update states that "the landscape of East Renfrewshire, immediately to the south of Scotland's largest city, faces a contrasting set of pressures. The majority of the landscape within East Renfrewshire is designated Green Belt; this recognises the importance and inherent sensitivity of this landscape as a setting to Glasgow to the north. In addition to this sensitivity there is the value of this landscape offering recreational opportunities and a contrast of landscape in relation to the adjacent urban landscape". The proposed plan states (on page 56) that the "green belt boundary will continue to be maintained and protected with only minor amendments made in this Proposed Plan".
3. Green belt shown in the proposed plan covers the majority of the land outside the urban area in East Renfrewshire, with remaining areas (concentrated to the south of the authority) covered by a countryside around towns designation. Proposed policy D3 (green belt and countryside around towns) applies the same considerations to proposals within either the green belt or the countryside.
4. Scottish Planning Policy states that the spatial form of green belt should be appropriate to the location. As demonstrated in paragraphs 1 and 2 above, the council has undertaken successive green belt reviews to inform plan preparation and support its spatial strategy. The proposed plan's development strategy of 'consolidation and regeneration' (further addressed in Issue 2 of this report) aligns with Clydeplan's 'compact city' model and the green belt objectives set out in paragraph 8.15 of Clydeplan to direct planned growth to the most appropriate locations and support regeneration. I note that Scottish Planning Policy suggests that green belt boundaries can be drawn to allow for expansion of smaller settlements; and that some edge of settlement locations (including sensitive infill proposals) could be sustainable in relation to accessibility to services and facilities. However, as indicated in Issue 14 (housing supply, delivery and phasing), there is sufficient housing supply to meet the housing land requirement and, consequently, there is no need to release any further green belt land for housing in or around settlement edges. I find that the form of the green belt boundary tightly drawn around urban areas is reasonable in these circumstances.
5. Scottish Planning Policy also directs local development plans to describe the types and scales of development appropriate in the green belt. Proposed policy D3 follows this direction by setting out what development would be appropriate in the green belt.

6. In relation to countryside around towns, paragraph 76 of Scottish Planning Policy states that in “pressurised areas easily accessible from Scotland’s cities and main towns, where ongoing development pressures are likely to continue, it is important to protect against an unsustainable growth in car-based commuting and the suburbanisation of the countryside, particularly where there are environmental assets such as sensitive landscapes or good quality agricultural land. Plans should make provision for most new urban development to take place within, or in planned extensions to, existing settlements”. I consider that the southern part of East Renfrewshire, covered by the countryside around towns designation, amounts to a pressurised area easily accessible to Glasgow where a restrictive approach to development is reasonable.

7. Furthermore, paragraph 81 of Scottish Planning Policy states that “in accessible or pressured rural areas, where there is a danger of unsustainable growth in long-distance car-based community or suburbanisation of the countryside, a more restrictive approach to new housing development is appropriate, and plans and decision-making should generally: guide most development to locations within or adjacent to settlements; and set out the circumstances in which new housing outwith settlements may be appropriate avoiding use of occupancy restrictions”. Again, this statement supports the approach of identifying the area to the south of East Renfrewshire as countryside with restrictions on development.

8. Drawing on the above, I find that spatially there is adequate justification to designate all land outwith urban areas as either green belt or countryside around towns. I appreciate that policy D3 applies the same assessment considerations to proposals in the green belt as those in a countryside around towns location. However, there is no prohibition of such an approach. The provisions in Scottish Planning Policy clearly indicate that a more restrictive approach can be taken in pressurised rural/countryside locations. While the same policy provisions apply, the two designations are distinct in that the reasoning and/or justification for their designation differs. I find that retaining a combined green belt and countryside around towns policy is reasonable in this case; that there is no need to divide policy D3 into a separate green belt and countryside around towns policies; or to insert a less restrictive approach to development in countryside locations.

9. In support of my findings, I note that these same issues were raised and dealt with in the examination of the adopted local development plan. The boundaries of the green belt and countryside around towns are almost entirely the same in the adopted local development plan as those shown in the proposed plan. The adopted plan addresses the green belt and countryside around towns designations in one policy as per proposed policy D3. In addition, the reporter’s conclusions on these matters, expressed in the examination report on the adopted local development, found no justification to amend the approach. In further support, I note that the Woodland Trust Scotland approves of the approach taken. No modifications to the green belt or countryside around towns designations are recommended.

10. Turning to exceptions, I disagree with parties that the provisions of proposed policy D3 would preclude development in the green belt or countryside around towns. The policy allows development “limited to what is required and is appropriate for a rural location” with a set of considerations. I consider that this statement would not prohibit the assessment of small scale housing where appropriate in certain circumstances. There is also an appropriate list of uses supported in principle including those for agriculture; forestry; equestrian; countryside recreation and active travel; outdoor leisure

and tourism; economic and farm diversification; renewable energy and infrastructure. Replacement buildings are also supported.

11. However, Clydeplan policy 8 (housing land requirement) states that “local authorities should take steps to remedy any shortfalls in the five-year supply of effective housing land supply through the granting of planning permission for housing developments, on greenfield or brownfield sites” subject to a series of criteria. The reference to greenfield is significant. There is no specific provision in proposed policy D3 to make an allowance for housing in greenfield locations where a shortfall exists.

12. I appreciate that the proposed plan strategic policy 1 (development strategy) encourages the re-use of brownfield and vacant land in accord with a sequential approach to site selection; and that policy SG1 (housing supply, delivery and phasing) includes a housing release clause where a shortfall in the five year effective land supply is identified allowing the release of green belt in set circumstances. Despite these provisions there is no mention in policy D3 that greenfield land could be suitable for housing release where a shortfall in the five year effective housing land supply exists. While the development plan should be read and applied as a whole, the absence of such a clause could result in an internal conflict in the proposed plan’s policy provisions, with policy SG1 allowing housing release where justified but policy D3 retaining a firm stance against the release of green belt and countryside around towns for uses not appropriate to a rural location. For that reason, I find that it would be appropriate for policy D3 to include reference to housing release where a shortfall is identified.

13. As expressed in Scottish Government planning circular 6/2013 on ‘development planning’, there is no need for the local development plan to repeat strategic development plan policy as the provisions of both documents would apply when assessing development proposals. Therefore, there is no requirement for policy D3 to recite the housing release criteria stated in Clydeplan policy 8. A simple statement within policy D3 referring to an allowance for the consideration of greenfield sites to be released, where a shortfall is identified, would suffice (as presented in my recommendations below).

14. Policy D3 requires “that there are no adverse landscape and visual impacts; and that proposals “have no adverse impacts upon the amenity of the surrounding rural area”. While preferable to have no adverse impacts, most forms of development are likely to have some form of impact. The level of impact and whether the impact(s) are acceptable is likely to be determined by the degree of significance. Therefore, I agree with parties that the word “significant” should be inserted into the aforementioned provisions to require no significant adverse impacts when assessing proposals.

15. As confirmed by the council, the green belt boundary shown on the proposals map does not cover garden ground at 379 Glasgow Road. Therefore, no change to the proposed plan is required to rectify this matter.

16. The additional references suggested by Scottish Natural Heritage (now NatureScot) within proposed policy D3 to landscape treatments reflecting local character; use of high quality materials and planting; retention of existing natural and built features; and the securing of landscaping treatment through contributions (where necessary) are already provided in proposed policy D1 (placemaking and design), policy D6 (open space requirements in new developments) and strategic policy 2 (development contributions). However, the text related to new planting having to be native is not contained anywhere

in the proposed plan. Paragraph 217 of Scottish Planning Policy states that “where appropriate, planning authorities should seek opportunities to create new woodland and plant native trees in association with development”. For that reason, I find it appropriate that text related to planting of native trees be included in the proposed plan. However, I recommend that the best fit for this addition would be in policy D6 which covers planting requirements generally, rather than D3 which is specific to green belt/countryside development.

17. The council has clarified that the mechanism to apply recommendations included in the council’s ‘Green Belt Landscape Character Assessment Update’ (2016) in relation to green belt defensibility, setting and accessibility will be through application of local development plan policies, including proposed policy D3. No change to the proposed plan is required to explicitly clarify this mechanism.

18. The support for no new housing development in the green belt from David Williamson is noted. Matters related to allocated and promoted sites in Eaglesham and Waterfoot are dealt with in Issue 23 (submitted housing supply - Eaglesham) and Issue 27 (submitted housing supply - Waterfoot).

Policy D3.3 (new build housing)

19. As I recommend a release statement is provided in policy D3, there is no need to also include such a clause within policy D3.3 (new build housing). This approach addresses the requested modification sought by Gladman Developments Limited.

Reporter’s recommendations:

Modify the proposed local development plan by:

1. Adding the following additional text to the final sentence of criterion 2. of Policy D6: Open Space Requirements in New Development on page 65:

“and incorporate native trees where appropriate;”.

2. Adding the following final sentence to the third paragraph of Policy D3: Green Belt and Countryside around Towns (CAT) on page 57:

“Where there is a shortfall in the 5 year effective housing land supply, as detailed in Policy SG1: Housing Supply, Delivery and Phasing, release of green belt or countryside for housing may be appropriate.”.

3. Inserting the word “significant” between “no” and “adverse” to read “no significant adverse” in the first and second sentences of paragraph 2 in Policy D3: Green Belt and Countryside Around Towns (CAT) on page 57.

Issue 9	Green Infrastructure	
Development plan reference:	Policy D4: Green Networks and Infrastructure	Reporter: Alison Kirkwood
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>SportScotland (7/4) GoBike (174/6) 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>		
Provision of the development plan to which the issue relates:	Section 3: Creating Sustainable Places and Communities Schedule 3: Green Networks and Projects Proposal D4.8: Cowdenhall adj. to Crofthead Mill, Neilston Pages 60 to 62	
Planning authority's summary of the representation(s):		
<p><u>(a) Policy D4: Green Networks and Infrastructure</u></p> <p><u>Support</u></p> <p><u>Sport Scotland (7/4)</u></p> <ul style="list-style-type: none"> • Policy welcomed as it seeks to protect & improve spaces which provide opportunities to participate in sport, recreation and have responsible access. <p><u>Scottish Natural Heritage (178/5)</u></p> <ul style="list-style-type: none"> • The intention to prepare a Green Network Strategy (including open space audit) as part of the Green Network Supplementary Guidance is strongly supported. We recommend spatially representing the existing green network as well as opportunities for new/enhanced provision. We also welcome the reference to the Central Scotland Green Network partnership (CSGN). • Consider that master plans and development briefs play a key role in protecting and enhancing green networks and we welcome their emphasis in the policy. <p><u>GoBike (174/6), Thomas Corwallis (471/4)</u></p> <ul style="list-style-type: none"> • 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.

Broom, Kirkhill and Mearnskirik Community Council (255/9) (255/10) (255/11) (255/12)

- Support policy D4, D4.7 Rouken Glen Park, D4.11 Maidenhill/Malletsheugh and D4.12 enhanced greenspace at Mearns, Crookfur and Shawwood Parks.

Woodland Trust Scotland (376/3)

- Support this policy as written - particularly requirement that green network provision will form a core component of any masterplan or development brief. Important to ensure that highest quality green network development is incorporated from an 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) Schedule 3 - Proposal D4.8: Cowdenhall adj. to Crofthead 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 Crofthead 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 (174/6), Thomas Corwallis (471/4), Broom, Kirkhill and Mearnskirk 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. Maps spatially showing the green network will be set out in the revised Green Network Supplementary Guidance.
- 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 Crofthead 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:

Policy D4: Green Networks and Infrastructure

1. The support within representations for policy D4 (green networks and infrastructure), related proposals included in schedule 3, and land identified as green network and open space is noted but requires no examination.
2. I agree with Scottish Natural Heritage (now NatureScot) that replacing the word 'may' with 'will' would provide greater certainty as to the council's expectations in terms of the mitigation required, where a proposal would have an adverse impact on the green network. A slight modification is therefore recommended.

Schedule 3 – Proposal D4.8 Cowdenhall adjacent to Crofthead Mill, Neilston

3. Schedule 3 in the proposed plan provides a list of green network proposals, the implementation of which the council will support. Proposal D4.8 at Cowdenhall is for 'access and woodland planting management'. This area contains ancient woodland and, as identified on the proposals map, is located within a local biodiversity site and the green belt. It is also covered by a tree preservation order.
4. Proposed policies D1 (placemaking and design) and D7 (natural environment features) referred to by the council would protect the ancient woodland and require any new green infrastructure to protect and enhance the habitat and biodiversity of the area, should any development come forward on the Cowdenhall site. However, as the site is not promoted/allocated for development in the proposed plan, I do not consider that consistency with these policies is relevant in the context of schedule 3.
5. The function of schedule 3 is to support proposals for the improvement/enhancement of the green network. On this basis, the revision of the schedule to refer to the protection and enhancement of existing woodland together with the promotion of native woodland (where appropriate) is reasonable. A small change to the schedule is therefore recommended.

Reporter's recommendations:

Modify the proposed local development plan by:

1. Replacing the word "may" with "will" in paragraph 4 of policy D4 on page 61.
2. Amending the description in schedule 3 on page 62 for D4.8 (Cowdenhall) to read as follows: "Access and woodland planting management. Protection of woodland area and enhancement, including planting of native tree species, where appropriate."

Issue 10	Greenspace and Open space	
Development plan reference:	Policy D5 Protection of Urban Greenspace Policy D6 Open Space Requirements in New Developments	Reporter: Gordon S Reid
Body or person(s) submitting a representation raising the issue (including reference number):		
Sport Scotland (7/5) Scottish Natural Heritage (178/6) (178/7) Woodland Trust Scotland (376/5) Church of Scotland General Trustees (499/2)		
Provision of the development plan to which the issue relates:	Section 3: Creating Sustainable Places and Communities Schedule 4: Open Space Requirements Pages 63 to 65	
Planning authority's summary of the representation(s):		
<p><u>Support</u></p> <p><u>Sport Scotland (7/5)</u></p> <ul style="list-style-type: none"> • Certain policies have direct implications for participation in sport & recreation. Both policies are welcomed as they seek to protect & improve spaces which provide opportunities to participate in sport, recreation and have responsible access. <p><u>Scottish Natural Heritage (178/6) (178/7)</u></p> <ul style="list-style-type: none"> • The inclusion of policy D5 is welcomed. • 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. <p><u>Woodland Trust Scotland (376/5)</u></p> <ul style="list-style-type: none"> • Welcome and support policy D6. <p><u>Objections</u></p> <p><u>Scottish Natural Heritage (178/6) (178/7)</u></p> <ul style="list-style-type: none"> • Greater detail could be provided in relation to alternative urban greenspace provision to ensure that it is high quality and in a convenient location. • 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.

Church of Scotland General Trustees (499/2)

- 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:

Support

Sport Scotland (7/5), Scottish Natural Heritage (178/6) (178/7), Woodland Trust Scotland (376/5)

- The Council acknowledges and welcomes the support for Policy D5 and D6.
- It is not proposed to modify the Plan based upon the above.

Objections

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 3rd 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/79) 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.
- It is not proposed 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:

Policy D5: Protection of Urban Greenspace

1. The support in the representations by Sport Scotland and Scottish Natural Heritage (now NatureScot) for proposed policy D5 (protection of urban open space) is noted but requires no examination.
2. I agree with NatureScot that a minor modification to the third bullet point of paragraph 3 of policy D5, to include the additional words ‘high quality’ and ‘within a convenient distance’ would help to provide clarity on what the council requires from developers as part of the mitigation measures for the provision of alternative urban greenspace.
3. The matter raised by The Church of Scotland Trustees concerning the removal of part of the designated urban greenspace at Mearns Kirk Glebe is addressed in Issue 24 (submitted housing supply – Newton Mearns).

Policy D6: Open Space Requirements in New Development and Schedule 4: Open Space Requirements

4. The general support in the representations by SportScotland, Woodland Trust Scotland and NatureScot for proposed policy D6 (open space requirements in new development) is noted but requires no examination.
5. Paragraphs 30 and 31 of the Scottish Government’s ‘Planning Advice Note 65: Planning and Open Space’ set out advice on the approach that can be taken to determining the ‘quantity’ of open space provided within new developments. In doing so I note that paragraph 30 of the note advises that any standards should be ‘carefully tailored’ to the ‘circumstances’ of the particular local area. Therefore, I find that it is open to the council to determine the approach to be taken in calculating the levels of open space required for new developments within its area. I note that the approach set out in schedule 4 (open space requirements) of the proposed plan seeks to relate the quantity of open space required to the likely number of users generated by a new development through the use of the number of habitable rooms. I find that this generally aligns with the advice set out in paragraph 30 of planning advice note 65. Furthermore, I agree with the council that this would relate directly to the scale and type of housing proposed and allow for a more refined approach. Consequently, I do not consider there is sufficient evidence to support the contention by NatureScot that the use of this approach is inappropriate or would be likely to lead to a lower provision of open space. Therefore, I find that no modification to schedule 4 of the proposed plan is required.

Reporter’s recommendations:

Modify the proposed local development plan by:

1. Replacing the wording of the third bullet point of paragraph 3 of policy D5: Protection of Urban Greenspace on page 64 with:

“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.”

Issue 11	Natural Environment Features	
Development plan reference:	Policy D7: Natural Environment Features	Reporter: Gordon S Reid
Body or person(s) submitting a representation raising the issue (including reference number):		
<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>		
Provision of the development plan to which the issue relates:	Section 3: Creating Sustainable Places and Communities Schedule 5: Natural Environment Policy D7.3: Local Biodiversity Sites Pages 66 to 67	
Planning authority's summary of the representation(s):		
<p><u>(a) Policy D7: Natural Environment Features</u></p> <p><u>Support</u></p> <p><u>Broom, Kirkhill and Mearnskirk Community Council (255/1)</u></p> <ul style="list-style-type: none"> • Support for Policy D7. <p><u>Objections</u></p> <p><u>Scottish Natural Heritage (178/8)</u></p> <ul style="list-style-type: none"> • Clarification should be provided in relation to mitigation measures. A number of modifications to the text are suggested to provide this clarity. • 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. • Consider that Part 4 of this policy should be expanded to ensure that the findings from an ecological appraisal inform the mitigation measures. <p><u>Woodland Trust Scotland (376/6)</u></p> <ul style="list-style-type: none"> • 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. 		

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

Objections

Mr and Mrs Green (133/2)

- 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 Mearns Kirk 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

Objections

Mr and Mrs Green (133/2)

- The Council does not accept the modification. The Local Biodiversity Site (CD/48) 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:

Policy D7: Natural Environment Features

1. The support of Broom, Kirkhill and Mearns Kirk Community Council for the provisions of policy D7 (natural environment features) is noted but requires no examination.
2. The support for policy D7 by Scottish Natural Heritage (now NatureScot) subject to proposed minor modifications to the wording is noted. I agree that the inclusion of the wording 'wherever this is not possible' to the final sentence of criterion 1 of policy D7 would help to clarify the requirements of this criterion. In respect of criterion 2, I agree that the replacement of the word 'and' with the word 'or' at the end of criterion 2a would help to clarify how the criteria are to be applied in the consideration of development proposals affecting Sites of Special Scientific Interest. I also agree that an additional sentence at the end of criterion 4 of policy D7 advising that identified mitigation measures should be included within an ecological appraisal would help to clarify what is required from developers by the council. A slight modification to each of the respective parts of policy D7 is, therefore, recommended.
3. NatureScot also recommends additional wording to criterion 3a of policy D7 relating to the enhancement of wildlife networks. Criteria 3a seeks to ensure the retention and future protection of existing groups of trees or woodland that make a significant positive

contribution to the area. I agree with the council that through the retention of existing trees there would be benefits for the wildlife network. However, through strategic policy 1 (criterion 7), policy D4 (paragraph 2) and policy D6 (criterion 2) provision is made for the protection and enhancement of the green and blue networks to benefit both wildlife habitats and biodiversity. In addition, policy D6 seeks to ensure that planting within new development promotes and enhances the biodiversity of the area. I find that adequate provision is made within the proposed plan for the protection and enhancement of wildlife habitats and networks. Therefore, I consider that the additional wording to criterion 3a is not necessary and no modification is required.

4. The council accepts the inclusion of the additional wording suggested by NatureScot in relation to ‘semi-natural woodland and tree preservation orders’ in criterion 3 of policy D7. I agree that this would help to emphasise the protection afforded to these types of woodland and trees. Therefore, a slight modification to the wording of policy D7 is recommended. However, I note that the council does not accept the recommendation to include the additional wording regarding the requirement to balance the loss of protected woodland against social, economic or environmental, factors. As there are separate statutory provisions and government guidance in relation to the felling of protected trees and woodland I consider that it is not appropriate or necessary to include the additional wording to criterion 3 of policy D7. Therefore, I do not find that this proposed modification to the policy is required.

5. The support by Woodland Trust Scotland for policy D7 subject to proposed minor modifications to the wording is noted. The council does not object to the proposed modification to move the first sentence in paragraph 2 of the supporting text on page 66, relating to ancient woodland, to the end of the third paragraph of criterion 3 of policy D7. I agree that by moving the existing wording to criteria 3 it would help to strengthen the policy through clarifying the requirement to protect these areas from the adverse effects of development. A minor modification to the wording of policy D7 is recommended.

6. Whilst I note that no modification to the wording of policy D7 is being sought in the representation from Mr and Mrs Green it does seek to remove the schedule 5 (natural environment) - D7.3 (local biodiversity sites) designation from Fa’side House, woods and quarry. The area covered by the D7.3 designation was surveyed and assessed by the council over the period from 2012 to 2013 and then in agreement with the landowner at the time designated as a local biodiversity site. Whilst there has been housing developed to the east and land under development for housing to the south and west of Fa’side House, woods and quarry I have no evidence before me to suggest that there has been any significant physical change to the area covered by designated local biodiversity site to alter its value. In addition, the council has highlighted that it intends to reinforce the existing areas of woodland through new shelterbelt planting as part of future development proposals. Therefore, I find that there is insufficient justification to remove the schedule 5 designation from Fa’side House, woods and quarry and no modification to the proposed plan is required.

Reporter’s recommendations:

Modify the proposed local development plan by:

1. Adding the text “wherever this is not possible” to the end of the final sentence of criterion 1 of policy D7 on page 66.

2. Replacing the word “and” with “or” at the end of criterion 2a of policy D7 on page 66.
3. Delete the third paragraph of criterion 3 of policy D7 on page 66 and replace it with the following sentence: “The loss of ancient or semi-natural woodland, or trees covered by Tree Preservation Orders will not be supported.”.
4. Deleting the first sentence of paragraph 2 of the supporting text on page 66 and adding the following additional sentence to the end of the third paragraph of criterion 3 of policy D7 on page 66: “Ancient woodland is an irreplaceable resource and should be protected from adverse impacts arising from development.”.
5. Adding in the following sentence to the end of criterion 4 of policy D7 on page 66: “This appraisal should identify measures adequate to mitigate any impacts that are identified.”.

Issue 12	Sustainable Transport Networks and Access	
Development plan reference:	Policy D8: Sustainable Transport Networks Policy D9: Access Policy D11: Electric Charging Infrastructure	Reporter: Malcolm Mahony
Body or person(s) submitting a representation raising the issue (including reference number):		
<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) (174/3) (174/4) 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) (471/3) (471/4) (471/5) Network Rail (475/1) Homes for Scotland (476/5) Scottish Government (486/9) Wallace Land Investments (489/5) Robertson Homes (495/5) Strathclyde Partnership for Transport (498/1)</p>		

Avant Homes (504/4)	
Provision of the development plan to which the issue relates:	<p>Section 3: Creating Sustainable Places and Communities. Strat 3.7 Barrhead South Train Station 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 Supporting documents:</p> <ul style="list-style-type: none"> • Transport Background Report (BR3)
Planning authority's summary of the representation(s):	
<p><u>(a) Policy D8: Sustainable Transport Networks</u></p> <p><u>Support</u></p> <p><u>SportScotland (7/6)</u></p> <ul style="list-style-type: none"> • Policy welcomed as it seeks to protect and improve spaces which provide opportunities to participate in sport, recreation and have responsible access. <p><u>David Williamson (117/3)</u></p> <ul style="list-style-type: none"> • Agree with emphasis on improving bus services to increase patronage and fully serve the areas covered by routes. <p><u>Broom, Kirkhill and Mearnskirk Community Council (255/14)</u></p> <ul style="list-style-type: none"> • 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. <p><u>Network Rail (475/1)</u></p> <ul style="list-style-type: none"> • Network Rail welcomes the Council's support towards investment in the strategic transport network as set out in Policy D8. • 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). <p><u>Strathclyde Partnership for Transport (498/1)</u></p> <ul style="list-style-type: none"> • 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.
- Welcome the prospect of a new railway station at Barrhead South - walking and cycling routes to the station should be predominant over driving routes.
- Support proposal D8.9. It will provide greater connectivity to key 'journey generators' such as Williamwood High School.

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 (471/5)

- 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.” (Strat 3.7 Barrhead South Train Station)
- An appraisal in line with STAG is required when seeking Government funding, support or approval for options to change the transport system.

(b) Schedule 6: Proposal D8.1: Core Paths (Council Wide)

Objections

David Henderson (238/2)

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

(c) Schedule 6: Proposal D8.2: Rights of Way (Council Wide)

Objections

Mr and Mrs Green (133/3)

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

(d) Schedule 6: Proposal Policy D8.10: Busby Glen/Overlee Park

Objections

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) Schedule 6: Proposal D8.13: Netherlee to Giffnock

Support

GoBike (174/3), 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

Objections

GoBike (174/4) Thomas Cornwallis (471/4)

- 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 roads - 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) Schedule 6: 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) Schedule 6: Proposal Policy D8.10: Busby Glen/Overlee Park

Alexander Newall (121/1)

- Suggests an alternative core path route along the waterfront.

(e) Schedule 6: 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 Mearnskirik 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 (471/5)

- 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/50) 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/68). 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 (Strat 3.7) 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 and reflect the outcome of the Barrhead South Accessibility Appraisal (CD/85).
- The 2nd 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) Schedule 6: 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/49) 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) Schedule 6: 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) Schedule 6: Proposal D8.10: Busby Glen/Overlee Park

Objections

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 competed 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) Schedule 6: Proposal D8.13: Netherlee to Giffnock

Support

GoBike (174/4) Thomas Cornwallis (471/3), 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

Objections

GoBike (174/4), Persimmon Homes (397/4), Thomas Cornwallis (471/4), 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

Objections

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:

Supporting representations

1. The general support in representations for policy D8: Sustainable Transport Networks; Schedule 6: Proposal D8.13, Netherlee to Giffnock; and policy D9: Access in the proposed plan is noted but requires no examination.

(a) Policy D8: Sustainable Transport Networks

2. I note that the council concedes a lack of progress on cycling measures, however, as it points out, the appropriate place for details of active travel proposals to be set out is in its Active Travel Plan rather than the local development plan. My remit is limited to the local development plan and I therefore unable to amend the Active Travel Plan. Similarly, making roundabouts safer for cyclists is project-related and outside the scope of my examination.

3. I agree with the council that there is merit in showing all strategic cycling corridors in the local development plan to demonstrate that they form a connected network.

4. The need for policy D8: Sustainable Transport Networks to address connections within active travel networks is well justified, and the council accepts this. The amendment suggested by Scottish Natural Heritage (now NatureScot) and agreed by the council, should therefore be incorporated in the policy.

5. Capping the period over which applicants for development are encouraged to provide subsidised bus services, in the absence of public transport services, risks developments being left without such services in the medium to longer term. That would be contrary to the policy's aspirations for development to be directed to sustainable locations. Relating the need to provide subsidised bus services to viability would be similarly be contrary to that aspiration. Nor do I see any justification in Scottish Planning Policy for introducing such a restriction.

6. Mary MacCallum suggests that the council should look at a new interchange station at Drumby in the Williamwood area, where two rail lines cross, and using adjacent ground, allocated for housing, to provide parking. As the council points out, this would be a major

transportation project requiring a detailed Scottish Transport Appraisal Guidance process to assess it. Since no such assessment has been carried out, it would not be appropriate to include reference to it in the local development plan.

7. The Scottish Government has suggested, and the council has agreed, that the rail halt at Barrhead South is being promoted subject to the outcome of a Scottish Transport Appraisal Guidance process. That being so, the introductory text to the Sustainable Transport Network and Active Travel section of the plan requires to be amended in the interest of accuracy.

(b) Schedule 6: Proposal D8.1: Core Paths (Council-Wide)

8. David Henderson proposes that the route which runs between Huntly Park main entrance through to Muirend Park should be a core path. However, it is not identified as such in the council's Core Path Plan and cannot be added to that plan through the local development plan process. Nevertheless, the council state that they will consider it for core path status in the next review of the Core Path Plan.

(c) Schedule 6: Proposal Policy D8.10: Rights of Way (Council-Wide)

9. Mr and Mrs Green wish the local development plan to have regard to the possibility that a right of way linking Lanrig Road to Faside Lodge in Newton Mearns may need to be relocated in the light of a proposed development for the quarry area. The proposals map for the proposed plan shows the right of way in its current position. I consider that it would be premature to indicate a change prior to any planning permission which might, or might not, be granted. The application process would have to consider whether any consent would necessitate a rerouting of the right of way.

(d) Schedule 6: Proposal Policy D8.10: Busby Glen/Overlee Park

10. Alexander Newall wishes to see the White Cart cycle path extension at Monteith Drive and through residential streets relocated to run along the waterfront. Core paths can only be revised or added in a review of the council's Core Path Plan. I am therefore unable to recommend any change to the network in this examination.

(e) Schedule 6: Proposal D8.13: Netherlee to Giffnock

11. The proposed plan supports a feasibility study into access across the railway line between Netherlee and Giffnock for pedestrians and cyclists. Objectors are, amongst other things, sceptical about the need, cost-effectiveness, practicality and amenity impact of such a scheme. However, what is proposed is an externally-funded feasibility study which would no doubt consider those matters, alongside options for the location and specification of the proposed project. I consider that it would be premature to delete this proposal in advance of the feasibility study. Consequently, no amendment is required.

(f) Policy D9: Access

12. In response to a representation from East Renfrewshire Sustrans Volunteers, the council concedes a lack of progress on cycling measures. However, as it points out, the appropriate place for details of active travel proposals to be set out is in its Active Travel Plan rather than the local development plan. My remit is limited to the local development plan and I therefore unable to amend the Active Travel Plan.

13. R O'Brien criticises the plan for an excessive focus on Whitelee, Dams to Darnley Country Park and Rouken Glen, and especially on the dependency of the first two on access by car. Whilst existing access to the Dams to Darnley Country Park is mainly by car, the council is investigating off-road quiet routes and associated links at the country park. Connectivity between smaller local parks and their maintenance are also criticised. However, these are not matters which I could remedy within the scope of this examination.

(g) Policy D11: Electric Charging Infrastructure

14. As Scottish Planning Policy indicates, electric vehicle charge points should always be considered as part of any new development and provided where appropriate.

15. Homes for Scotland, supported by Robertson Homes, argue that the policy in its current form, requiring 100% provision of charging points for dwellings with a garage or driveway within major developments, would have a substantial impact on the electricity grid, which would be outside control of developers and the local authority. Also that the proposed policy would represent a major change and should await a national level solution through the emerging National Planning Framework 4.

16. However, as grid capacity is likely to be an issue local to the vicinity of each development site, I see no imperative to wait for publication of the new national framework before setting out policy. Moreover, where any intractable problem with grid capacity arose it would be for the developer to seek to negotiate a relaxation of policy on a case by case basis.

17. Persimmon Homes contend that 100% provision of charging points would lead to the majority not being used. This they say would lead to increased costs being incurred and passed on to the purchasers, together with the danger that by the time the charging points were used technological changes might have made the installation obsolete. They therefore suggest the requirement be amended to passive provision which involves providing the infrastructure to install a charging point, but not the charging point itself.

18. I accept that current levels of electric car ownership are still low although, given that the government's ambition is to replace fossil fuel powered vehicles in a relatively short timescale, that is likely to change quickly. Moreover, part of the purpose of charging point provision is to encourage uptake in ownership. However, I consider that there requires to be flexibility in the policy between active and passive provision to allow for the circumstances of each site, changes in levels of electric vehicle ownership and possible changes in technology. It would be open for the council to set out more detail in planning guidance, for example, on the balance between active and passive provision, which could be more readily updated than the policy itself.

(h) Transport: Background Report

19. Marian Stewart criticises multiple aspects of the transport background paper which was used to inform transport elements of the proposed local development plan. However, as my remit is solely to examine the proposed plan itself, I am unable to make any amendments in relation to this representation.

Reporter's recommendations:

Modify the proposed local development plan by:

1. Amending the second sentence in the third paragraph of Policy D8: Sustainable Transport Networks on page 70 to read:

“Proposals will require 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.”.

2. Amending the second sentence of the fourth paragraph in the ‘Sustainable Transport Network and Active Travel’ section of the plan on page 68 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 and services, and to the Dams to Darnley Country Park.”.

3. Amending the first sentence of Policy D11: Electric Charging Infrastructure on page 75 to read:

“Major residential proposals will be required to incorporate electric vehicle charging points or passive provision for charging points within every dwelling with a garage or driveway, and to make provision within visitor parking or communal parking spaces.”.

Issue 12 - Sustainable Transport Networks and Access

(e) Proposal D8.13: Netherlee to Giffnock

Appendix 1 – Common 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)

Mr Forsyth (2/1)

- Proposed footbridge not required/wanted.
- Would turn quiet dead-end housing estate into short-cut route with resultant increased traffic & pedestrians raising safety concerns
- Poor condition Gordon Drive pavement will worsen with increased pedestrians.
- Overlooking/privacy issues. Increased antisocial behaviour
- Increased rubbish/dog litter.

Katie Whyte (9/1)

- Has ownership interest in the vicinity of site, which would impact on implementation of project.
- Concerns if implemented that there would be more people, litter, and noise.
- Considered access to Giffnock already reasonable (10 min) via access lane at bottom of Gordon Drive.
- Questions need for bridge and cost of project, considers Council budgets more appropriately spent on other Council priorities
- No immediate shop in area therefore questions need for project.
- Likely to devalue the cost of property.

Lauren Gilbert (11/1)

- Attraction of area is its seclusion, project considered to reduce attraction of the area.
- Questions the necessity of project, considered a heinous idea.

Sean McGowan (12/1)

- Unhappy with project as would increase car parking & traffic in area.
- Increase number of pedestrians heading to rugby events and train station.
- Safety concerns on roadway and loitering youths.
- Appreciates the seclusion of the area which would be changed and property devalued.

Mrs S Crichton (14/1)

- Not enough Parking.
- Traffic Congestion.
- Danger to pedestrians and children.

Charles Curran (23/1)

- Questions the need for the Project and whether the benefits outweigh the costs.

Stephen Thomson (39/1)

- Disrupt quiet cul-de-sac
- Sufficient alternative routes
- Increase congestion
- Safety issues of crossing in vicinity of railway line
- No need for project

Allan Davidson (73/1)

- Crossing from Gordon Drive to Cunningham Drive will save time.
- However, questions costs of project which are considered to vastly outweigh benefits.
- Questions the environmental benefits (especially if bridge erected).
- Considered feasibility study should be brief and show idea to be not cost effective and reject the idea.

Sylvia Johnston (105/1)

- Not required, loss of privacy.

Andrew Shanks (114/1)

- Potential number of uses considered low.
- Waste of money
- Limited benefit to cyclists & pedestrians
- Adversely affect privacy
- Bridge structure considered an eyesore against existing trees.
- No demand and unnecessary expenditure
- Road surface concerns.

Morag Rough (118/1)

- Feasibility study a waste of resources.
- Connectivity for pedestrians/cyclists between Netherlee/Giffnock is adequate by using access lanes.
- Location for crossing would not directly connect any main areas (schools/shops).
- Crossing would be a challenging construction, given height of railway line & utilities in vicinity.
- Crossing would become a focus for vandalism.
- No need (many negatives no positives).
- Considered waste of scarce resources

Anne Hind (120/1)

- Encourage footfall & anti-social behaviour.
- Crossing would be a negative feature at locality.

Kathryn Hamilton (126/1)

- Loss of privacy
- Negative impact on house value
- No benefit from proposal
- Noise pollution from railway
- Light pollution from bridge-
- Create anti-social behaviour
- Increase traffic

Olivia Knight (127/1)

- Invasion of privacy
- Light pollution
- Noise pollution
- Negative impact on biodiversity
- Increase in traffic

Alan McGinlay (129/1)

- No requirement
- Facilitate crime
- Unacceptable carbon footprint

Lynn McGinlay (130/1)

- Loss of biodiversity
- Not required
- Unacceptable carbon footprint
- Facilitate crime

Stephen Lockie (345/1)

- This will be a gigantic eyesore of a structure in Gordon Drive.
- Increased vehicular traffic especially for events at Rugby club.
- Increased pedestrian traffic.
- Existing petty vandalism will increase.
- Not convinced of usefulness of proposal.

Rolf Matthews (400/1)

- No necessity or benefit for such a link across the railway, as there is already suitable access between Netherlee and Giffnock.
- There is no requirement for this study to take place.
- There are better uses for this money.

Martin Lages (437/1)

- Loss of privacy & unsightly due to likely size & design of structure design of structure likely to be impractical and unattractive for cyclists.
- Loss of biodiversity little demand for the project

Issue 13	Community and Education Facilities and Infrastructure	
Development plan reference:	Policy D12: Community and Education Facilities and Infrastructure	Reporter: Malcolm Mahony
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>SportScotland (7/8) Alexander Newall (121/4) East Renfrewshire Council Education Department (170/1) (170/4) 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) Jackson Carlaw MSP (428/3) Miller Homes (463/9) CALA Homes (West) and Lynch Homes (467/4) Homes for Scotland (476/4) Stewart Milne Homes (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 & Mickel (507/4) Barratt Homes West (511/4) Gladman Developments Ltd (571/3)</p>		
Provision of the development plan to which the issue relates:	<p>Section 3: Creating Sustainable Places and Communities Community Facilities and Infrastructure Education Infrastructure Education Background Report (BR4) Schedule 8: Community Facilities Proposal D12.5: Eastwood Park, Giffnock D12.9: Overlee Park, Netherlee Schedule 9: Education Facilities D12.17: Neilston Primary School, Neilston</p>	
Planning authority's summary of the representation(s):		
<p><u>(a) Policy D12: Community and Education Facilities and Infrastructure</u></p> <p><u>Support</u></p> <p><u>SportScotland (7/8)</u></p> <ul style="list-style-type: none"> • Policy welcomed as it seeks to protect and improve spaces which provide 		

opportunities to participate in sport, recreation and have responsible access.

East Renfrewshire Council Education Department (170/1)

- 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.
- Education Department will continue to monitor demographic trends and pupil product ratios.

East Renfrewshire Council Education Department (170/4)

- Support for principle of promoting walking and cycling to school.

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 Lavern 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 Homes(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 - Proposal D12.5: Eastwood Park, Giffnock

Objections

Jackson Carlaw MSP (428/3)

- Requests addition to LDP2 text giving an unequivocal statement that a new leisure centre will be constructed at Eastwood Park.

(c) Schedule 8 - Proposal D12.9: Overlee Park, Netherlee

Objections

Alexander Newall (121/4)

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

(d) Schedule 9 - Proposal D12.17: Neilston Primary School, Neilston

Objections

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 Homes (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.

(b) Schedule 8 - Proposal D12.5: Eastwood Park, Giffnock

Jackson Carlaw MSP (428/3)

- Requests addition to LDP2 text giving an unequivocal statement that a new leisure centre will be constructed at Eastwood Park.

(d) 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) (170/4), 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, strong recognition of the importance of a network of safe walking and cycling routes to schools 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 3rd 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 7th 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 Homes (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/28) and other supporting Council Reports (December 2017, October 2018 and June 2019 (CD/35) (CD/36) (CD/37) and the Development Contributions SPG (CD/10) and its Education Addendum (2019) (CD/11).
- 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/47) 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 Main Issues Report (MIR) (CD/20) 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 Report of Conformity with the Participation Statement (CD/40). 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 6th December (well within the FOI statutory timescale (and 20th December 2019 deadline) (CD/54). 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 a 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)
Non-Denominational Primary					
Council	6,170	6,912	89%	742	52
Levern Valley	1,130	1,638	69%	508	345
Eastwood	5,040	5,274	96%	234	-293
Non-Denominational Secondary					
Council	5,385	6,318	85%	933	-14
Levern Valley	588	850	69%	262	135
Eastwood	4,797	5,468	88%	671	-149
Denominational Primary (Roman Catholic)					
Council	2,960	3,204	92%	244	-76
Levern Valley	721	924	78%	203	111
Eastwood	2,239	2,280	98%	41	-187
Denominational Secondary (Roman Catholic)					

Council	2,371	2,552	93%	181	-201
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 SPG (CD/06), 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 Levern 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/56) which report that in East Renfrewshire 20% 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/55). 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 is

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 Housing Land Audit (2019) (CD/51). However, as clearly evidenced under Issue 14 and Housing Background Report (BR1) (CD/24) and its update (CD/25), 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)	Remaining Capacity with inclusion of expected completions to 2031 when Planning for New Provision

					i.e. no future planning for schools)	(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, 3rd 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 Levern 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"*.
- Wallace Land Investments (489/9) proposal at Floors Farm, Waterfoot and Gladman Developments Ltd (571/3) proposal at Glasgow Road, Waterfoot for mixed use developments are addressed under Issue 27 (Submitted Housing Supply Waterfoot).
- 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 Lovern 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 and as follows.
- 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 2nd 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 Levern 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 Levern 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.

(b) Schedule 8 - Proposal D12.5: Eastwood Park, Giffnock

Objections

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 - Proposal D12.9: Overlee Park, Netherlee

Objections

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: Proposal D12.17: Neilston Primary School, Neilston

Objections

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. A master plan is being prepared to take forward the school proposal which will take into account this matter.

- 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:

Supporting representations

1. The general support in representations for policy D12 (community and educational facilities and infrastructure) of the proposed plan is noted but requires no examination.

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

2. R O'Brien's concerns to ensure that children have safe access to their schools is addressed by the third paragraph of policy D12 (community and education facilities and infrastructure). As the representation acknowledges, this is a matter of implementation and no policy change is required.

3. Olaware Olafare wishes to see affordable indoor tennis facilities in East Renfrewshire. The council indicates that future local development plans will closely align with the outcomes of a Sport and Physical Activity Strategy which is being prepared by the Culture and Leisure Trust. The strategy will, presumably, address the issue of tennis facilities. No amendment to the proposed plan is required.

4. The Theatres Trust wishes to see specific reference to cultural facilities in the list of facilities to be protected and enhanced. The council accepts that this would be appropriate and I agree that the proposed amendment to policy D12 referring to these facilities should be made.

5. NHS Greater Glasgow wishes to see the policy go further in requiring the incorporation of community facilities (including healthcare) as part of new developments where appropriate. I agree with the council that this is a matter which is covered in several parts of the proposed plan, as its response indicates. I also note that it intends to further analysis of this topic together with community planning partners. On this basis, I consider that no amendment to the policy is required.

6. Representations from Homes for Scotland and several volume house-builders seek revisions to the council's technical appraisal of its education infrastructure rather than any changes to policy D12. They do so in support of a case for releasing housing land beyond that allocated in the proposed plan. However, amendments to background documents do not fall within the remit of this examination.

7. Two of the representations from house-builders can be read as seeking reference within policy D12 to the provision of new schools on specific sites. Gladman Developments maintains that it is unacceptable and unsustainable for the council not to allocate further housing sites within the proposed plan in order to avoid exacerbating pressure on education facilities in East Renfrewshire. It therefore advocates that the

proposed plan should allocate suitable land in private ownership for construction of new primary schools, including within the site it is promoting at Glasgow Road, Waterfoot. Wallace Land Investments makes a similar representation, citing part of its promoted site at Floors Farm, Waterfoot for construction of a new primary school.

8. The council's justification for not identifying any further housing releases as part of the proposed plan is twofold. Firstly, it states in policy SG1 (housing supply, delivery and phasing) that the proposed plan provides a range and choice of housing sites sufficient to meet housing needs across all tenures in the period up to 2029, in compliance with the housing land requirements in Clydeplan. It also maintains that it has demonstrated a generous 5-year effective housing land supply together with a 10 year land supply, in accordance with Scottish Planning Policy. Secondly, it states that further housing releases would have major adverse impacts on the existing education and health infrastructure.

9. The first of those justifications has been examined under Issue 14 (housing supply, delivery and phasing), where it is concluded that the housing land requirement can be met from existing housing allocations. Moreover, in our examination of Issue 2 (development strategy), the council's strategy in this regard is found to be reasonable and appropriate. With respect to the council's expectation that it can provide a generous 5-year effective housing land supply at all times within the functional housing market area, this is referred to in Issue 14 where it is concluded that maintenance of an effective supply is expected. That being the case, we have no reason to recommend further housing releases to satisfy policy. The question of adverse impact on existing education and health infrastructure therefore does not arise. Consequently, there is no basis on which to recommend the inclusion of new primary school sites in policy D12, and no amendment to the proposed plan is required.

10. As referred to in our conclusions on Issue 2 (development strategy), Cala Homes and Lynch Homes argue that the plan should allow proposals for "pockets of housing" to come forward in areas where education pressures are not significant, for example where schools have remaining capacity. Mactaggart and Mickel make a similar argument with respect to Uplawmoor. In fact, strategic policy 1 (development strategy), does allow for the development of windfall housing where the impacts of residential development on education and other infrastructure can be overcome, subject to compliance with other development plan provisions. Consequently, there is no need to amend the proposed plan to achieve this end.

11. The concerns expressed by Eastwood High School Parent Council relate to potential adverse impacts on that school from housing allocations in the proposed plan. From its analysis of these housing allocations (which have been rolled forward from the current adopted plan) the council is satisfied that they would not have an adverse impact on education provision, and this has been accepted in our examination of Issue 14, which concludes that "the council's education resource is sufficient to meet the demands from allocated housing sites factoring in an allowance for windfall housing". No amendment to the proposed plan is therefore required.

(b) Schedule 8 – Proposal D12.5: Eastwood Park, Giffnock

12. Jackson Carlaw MSP requests an addition to the text of the proposed plan stating unequivocally that a new leisure centre will be constructed at Eastwood Park. He is concerned that extension of St Ninian's High School should not occur at the expense of

other facilities in the park.

13. The proposed plan states that a masterplan will be prepared for Eastwood Park to inform both an improved leisure centre and facilities, and remodelling of wider park uses. Whilst not exactly matching the statement requested in the representation, I cannot find that it is insufficient in representing the council's intentions for development within the park. Consequently, no amendment is required.

(c) Schedule 8 – Proposal D12.9: Overlee Park, Netherlee

14. Alexander Newall wishes to see no other development at Overlee Park beyond the nursery proposal, in the proposed plan. As the representation relates to potential future uses at Overlee Park beyond the timespan of the proposed plan, it falls outwith my remit, which relates solely to the proposed plan itself.

(d) Schedule 9 – Proposal D12.17: Neilston Primary School, Neilston

15. The Scottish Environment Protection Agency states that a surface water flood hazard has been identified at the primary school site requiring appropriate management measures. The council accepts that reference to a flood risk assessment for this site should be included in the plan. I agree that this would be appropriate and recommend its inclusion under proposal D12.17.

Reporter's recommendations:

Modify the proposed local development plan by:

1. Amending the first sentence of Policy D12: Community and Education Facilities and Infrastructure on page 80 to read:

“The Council will support the protection and enhancement of existing community, cultural, leisure, health, sports and education facilities.”.

2. Adding to the description column of Schedule 9: Education Facilities on page 83:

“Flood risk assessment will be required to determine the developable extent of the site and to ensure that the proposal is consistent with Scottish Planning Policy.”.

Issue 14	Housing Supply, Delivery and Phasing	
Development plan reference:	Policy SG1: Housing Supply, Delivery and Phasing	Reporter: Alasdair Edwards
Body or person(s) submitting a representation raising the issue (including reference number):		
<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 Homes (487/2) (488/2) Wallace Land Investments (489/6) (489/8) Mactaggart & Mickel (490/2) (493/3) Romano Family (494/2) Robertson Homes (495/8) Taylor Wimpey (497/2) Church of Scotland General Trustees (499/4) Gladman Developments Ltd (503/3) (571/4) Avant Homes (504/5) (504/7) (504/11) Lynch Homes (505/6) Mactaggart & Mickel (507/3) (507/4) Barratt Homes West (511/3)</p>		
Provision of the development plan to which the issue relates:	<p>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</p>	
Planning authority's summary of the representation(s):		
<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"> • Failure of the proposed plan to provide new additional housing sites is flawed. • Enormous housing pressure facing East Renfrewshire. • Homes in East Renfrewshire will become more expensive due to lack of supply. 		

- 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 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 Homes (487/2) (488/2), Mactaggart & Mickel (490/2) (493/3), Robertson Homes (495/8), Taylor Wimpey (497/2), Church of Scotland General Trustees (499/4), 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 HSMA's. 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) (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 Levern Valley HMA. There is a clear shortfall in the 5 year supply of effective private housing land that requires addressing in the Levern 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.

Mactaggart & Mickel (507/4)

- There are no significant education capacity constraints in the Levern Valley sub-area within East Renfrewshire in any sector. No Education constraint affecting Uplawmoor.

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 Levern 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	GGG 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-	3194	2805	TBC	TBC

31				
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) (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 Lavern 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; Lavern Valley; Housing Mix and Affordable Housing; and Economic Benefits of Housebuilding.

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 Homes (487/2) (488/2), Wallace Land Investments (489/6) (489/8), Mactaggart & Mickel (490/2) (493/3), Romano Family (494/2), Robertson Homes (495/8), Taylor Wimpey (497/2), Church of Scotland General Trustees (499/4), Gladman Developments Ltd (503/3) (571/4), Avant Homes (504/5) (504/7) (504/11), Lynch Homes (505/6), Mactaggart & Mickel (507/3) (507/4), Barratt Homes West (511/3)

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 allocated and alternative site proposals are set out under Issues 15 to 27.

Development Strategy

- Scottish Planning Policy (SPP) (CD/68) 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 Main Issues Report (MIR) (CD/20). 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/80).
- 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 later in this Schedule 4 response and under Issue 2.
- The Council has clearly evidenced the strategic approach taken for the Proposed Plan under Issue 2 and within the Housing Background Reports (BR1) (CD/24) and its revision (CD/25) and its approach to current and future education provision and mitigation in the Education Background Report (BR4) (CD/28). The long term strategic housing and education 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) and its revision, clearly demonstrate that the Proposed Plan will meet and also exceed the private and social rented housing 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.
- 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 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 (page 26) (CD/52) and contributes to the delivery of the Council's strategic priorities through 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

- 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' Strategic Housing Need and Demand Assessment (HNDA 2015) (CD/81) 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 up to 2029 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
Private Sector	2270	1050	3320	2610	1205	3815
Social Sector	540	322	862	620	366	986
All Tenure	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)

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

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

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

Housing Land Supply to 2031

- 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
(a) HLR	3230	1571	4801	3251*	1633	4884*
(b) Completions 2012 to 2019	1812	0	1812	1812	0	1812
(c) Housing Land Supply	1954	1582	3536	1954	1240	3194
(d) Total (b+c)	3766	1582	5348	3766	1240	5006
(e) Surplus or Shortfall (d-a)	+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 additional representations that Geddes prepared for Miller Homes (463/4), Cala Homes (West) (464/5), Wallace Land Investments (489/6) and Avant Homes (504/5) do 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 also factors in an assessment of potential affordable housing contributions as explained in the notes:

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% social sector under schedule 16 and where social sector 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 as shown in the Housing Background Report. 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

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

Housing Sub-Market Areas

- 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 as explained previously.
- 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 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 at the time of writing 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

- 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 (CD/78) 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 and others disagree 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/58) 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 Decision PPA-320-2135 - Morningside Road, Morningside, Newmains, North Lanarkshire (CD/59). 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

- 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):
- The title on page 93 should be amended to read:
How Many New Homes are Needed by ~~2029~~ 2031?
- Page 93 Para 2 Final Sentence should be amended to read:
Our requirements are set out in Table 1 (~~4350 units 2012-29~~)
- Page 94: Housing Supply, Delivery and Phasing. Para 1 1st Sentence should be amended to read:
The Background Report and Table 2.....of Clydeplan by ~~2029~~ 2031.
- Policy SG1 Para 1 should be amended to read:
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.

Levern Valley

- Gladman Developments Ltd (503/3), Mactaggert & Mikel (507/4), Barratt Homes West (511/3) 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. Individual site responses are set out under Issue 20 (Submitted Housing Supply Barrhead), Issue 25 (Submitted Housing Supply Neilston) and Issue 26 Submitted Housing Supply Uplawmoor).
- 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.
- 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. Furthermore, as evidenced previously there is also a wider surplus within the Renfrewshire HMSA of 830 by 2029.

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 (2017/0756/TP) (CD/60) 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.

Housing Mix and Affordable Housing

- The Proposed Plan supports the Council’s Local Housing Strategy (2017-22) (CD/45) and Strategic Housing Investment Plan (2020-2025) (CD/46) 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/70). 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

- 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:

1. Further information was gathered through written submissions on housing land supply from various interested parties and East Renfrewshire Council. These submissions have informed my conclusions below.

Development strategy

2. The spatial development strategy of Clydeplan (the strategic development plan for Glasgow and the Clyde Valley approved in July 2017) adopts a “compact city” model where the broad principles of regeneration and renewal; minimising carbon and development footprints; sustainable transport; climate change adaptation and mitigation; sustainable economic growth; and improved environmental quality are promoted. The strategy also supports a “presumption in favour of sustainable development that contributes to economic growth”. The proposed East Renfrewshire Local Development Plan 2 should, through law, be consistent with the provisions of Clydeplan as together these documents (alongside any statutory supplementary guidance) form the development plan for the area.

3. The development strategy promoted in the proposed plan follows that of Clydeplan with a particular focus on regeneration and consolidation of urban areas. It further promotes the objectives of: (1) creating sustainable places and communities; (2) promoting sustainable and inclusive economic growth; and (3) promoting a low carbon place with a range of supporting principles which align with the “compact city” model.

4. No additional land for housing over that previously allocated in the adopted East Renfrewshire Local Development Plan (2015) is promoted through the proposed plan. I do not agree with parties that this approach is flawed or counter to the development strategy. As noted in my conclusions below, the housing land requirement of Clydeplan could be met from existing housing allocations without further provision. There are 34 housing sites identified in schedule 15 of the proposed plan (including three master planned sites in Newton Mearns and Barrhead) which are delivering, and are programmed to deliver throughout the plan period, housing in various locations across the council area. The vast majority of these sites are contained in the agreed housing land audit 2019 as “effective” (with only four sites at Barnes Street, Barrhead; North Darnley Road, Barrhead; Crofthead Mill, Neilston and Neilston Juniors predicted to solely deliver post 2029). Therefore, I find no need for the council to conduct any further “robust review” of effectiveness (as suggested by parties) to support their inclusion in the proposed plan. In addition to these allocations, strategic policy 1 (development strategy) of the proposed plan also supports compatible infill development in rural settlements which would likely augment the supply of housing.

5. The 34 allocated housing sites range in remaining capacity from 5 to 672 homes (14 sites with between 5 and 50 homes; 10 sites with between 50 and 100 homes; and 10 sites with more than 100 homes). The allocations are spread across the authority in locations in Barrhead (13 sites); Newton Mearns (12 sites); Neilston (5 sites); and Clarkston, Giffnock and Uplawmoor (1 site in each settlement). I appreciate that there is a concentration of sites in Barrhead and Newton Mearns but that is reasonable and appropriate based on the size and location of these settlements and the amenities/facilities which they provide. I further note that of the sites allocated a substantial number of homes (some 1,250) would be delivered on master planned sites at Barrhead North (Lyoncross), Barrhead South (Spingfield) and Maidenhill in Newton

Mearns. However, there remain a large number of other sites which will also deliver housing with a range of capacities. Therefore, I disagree with parties that there is a reliance on master planned sites to meet the housing land requirement set by Clydeplan or that avoiding additional greenfield allocations limits the range and choice of housing sites. The recommended removal of allocations through this examination at Crofthead Mill and Neilston Juniors (predicted to deliver post 2029) would have little impact on the range and choice of housing (see Issue 18 for more information on these sites).

6. In addition, as existing sites are being built-out and sites are programmed to deliver throughout the plan period the fact that additional allocations are not promoted would not likely harm the valuable contribution towards economic growth from construction. I appreciate that in general economic terms a restricted supply could push the price of homes in the area up but, again, there is a generous supply of land for housing and a programme for delivery of housing across the council area which suggests that this would not likely be the case. Indeed, the supply of homes is only one of many factors which could influence house prices including location, connectivity, proximity to services, education, transportation, open space and community and leisure facilities. Furthermore, policies of the development plan support the provision of affordable housing which could also be promoted by private/market house-builders (shared ownership and discounted sale are examples) to provide access to ownership. Therefore, I disagree with parties that further housing land allocations are required to respond to the issue of “affordability”, to ensure that house prices are not inflated or to support economic growth.

7. Strategic outcome 3 within the council’s ‘Outcome Delivery Plan 2019-2022’ refers to East Renfrewshire as a “thriving place to invest and for businesses to grow” but also that the area “is an attractive place to live with a good physical environment”; “a great place to visit” and “is environmentally sustainable”. Homes for Scotland also note that the delivery plan seeks to “maximise affordable housing options”. These factors require to be balanced. The fact that the proposed plan does not promote any additional housing is not, in my opinion, a restraint to economic growth or the promotion of affordable housing. Therefore, the proposed plan is not inconsistent with the outcome delivery plan.

8. As identified in the proposed plan, and within Issues 2 (development strategy) and 13 (community and educational facilities) above, the council’s education resource is sufficient to meet the demands from allocated housing sites factoring in an allowance for windfall housing (which, as confirmed by the council in further written submissions equates to an average of 57 homes per year). Page 79 of the proposed plan states that “until further expansion of the Education Estate is realised, no new housing sites are identified for release” and that “further housing proposals will not be supported in locations where this would exacerbate capacity issues”. While I agree with parties that the response from the council could bar new housing from coming forward in certain locations that is not unreasonable or inappropriate in the circumstances where the housing land requirement is met as there is no need to go beyond this requirement particularly where, as in this case, education capacity issues would become a constraint to development. As noted below, the housing land requirement is predicted to be met and, therefore, the approach to restrict additional housing allocations is reasonable.

9. I find that the decision to continue to promote existing allocated sites for housing while not allocating additional sites aligns with the compact city model and the objectives and principles of the development strategy. This approach would not hinder economic

growth or be inconsistent with the council's outcome delivery plan.

Housing supply targets and housing land requirements

10. Scottish Planning Policy requires plans to set out a housing supply target to which a margin is added to provide a housing land requirement. In this case, Clydeplan (as the strategic development plan covering the area) sets an all tenure housing supply target for East Renfrewshire for the period 2012 to 2029 as 3,790 homes (770 affordable and 3,020 private). Adding a 15% margin, the housing land requirement for East Renfrewshire for 2012 to 2029 is 4,350 homes (880 affordable and 3,470 private).

11. As stated in Scottish Planning Policy, and reflected in Clydeplan policy 8 (housing land requirement), local development plans 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 year of adoption. The proposed East Renfrewshire Local Development Plan 2 is due to be adopted in 2021 and, consequently, the plan should make provision for up to the year 2031. Parties agree that the Clydeplan figures should be extrapolated to provide housing figures to the year 2031. I agree that extrapolation would be beneficial in giving an indication of need and provision for future housing. Extrapolation would not be manipulation of but an extension of the Clydeplan housing supply targets and housing land requirement for East Renfrewshire. I note that extrapolated figures could be subject to change as reassessment of strategic housing need and demand is likely to proceed through the review of the development plan in the future. Nevertheless, I find it appropriate and reasonable for the proposed local development plan to show figures to 2031 in alignment with Scottish Planning Policy and Clydeplan's provisions. Consequently, I have recommended provision of housing figures to 2031 in the proposed plan.

12. Clydeplan provides housing figures for the period 2012 to 2029 but also for the shorter period 2024 to 2029. Two methodologies are promoted to extrapolate figures to 2031: either, as suggested by the council, using the average for the period 2024 to 2029; or, as advised by other parties, taking the average for the period 2012 to 2029. These methods would result in the following:

All tenure housing figures for East Renfrewshire

	2012-2029 method	2024-2029 method
Annual HST	223 (3,790/17)	196 (980/5)
Plus 15% margin	33 (223*15%)	29 (196*15%)
Annual HLR	256 (223+33)	225 (196+29)
2029-2031 HST	446	392
2029-2031 HLR	512	450

Private housing figures for East Renfrewshire

	2012-2029 method	2024-2029 method
Annual HST	178 (3,020/17)	150 (750/5)
Plus 15% margin	27 (178*15%)	23 (150*15%)
Annual HLR	205 (178+27)	173 (150+23)
2029-2031 HST	356	300
2029-2031 HLR	410	346

Social (affordable) housing figures for East Renfrewshire

	2012-2029 method	2024-2029 method
Annual HST	45 (770/17)	46 (230/5)
Plus 15% margin	7 (45*15%)	7 (46*15%)
Annual HLR	52 (45+7)	53 (46+7)
2029-2031 HST	90	92
2029-2031 HLR	104*	106*

*Slight difference when adding separated social and private against all tenure figure due to rounding.

13. There is no standard or agreed method to calculate the period beyond 2029 and both methods presented are logical. However, as derived from the schedules in Clydeplan (and the table below), the annual average all tenure housing land requirement for East Renfrewshire falls from 269 homes in the period 2012-2024 ($3,230 \div 12$) to 224 homes in the period 2024 to 2029 ($1,120 \div 5$). This fall is also apparent in the annual average private housing land requirement falling from 218 homes ($2,610 \div 12$) to 172 homes ($860 \div 5$) over the same periods. The annual average requirement for social homes remains generally static at 52 homes. This trend for a falling requirement could be attributed to forecasting uncertainty in the later plan period but it, nevertheless, shows a declining housing need which could reasonably continue in the period to 2031. Therefore, in this case, I favour the methodology promoted by the council and, consequently, recommend use of extrapolated housing figures using the average 2024 to 2029 housing supply target and housing land requirement. The existing housing figures for 2012 to 2024 and 2024 to 2029 from Clydeplan together with the extrapolated figures for 2029 to 2031 for East Renfrewshire are shown in the table below.

East Renfrewshire - existing and extrapolated housing figures 2012 to 2031

	Housing Supply Target				Housing Land Requirement			
	2012-24	2024-29	2029-31	2012-31	2012-24	2024-29	2029-31	2012-31
Private	2,270	750	300	3,320	2,610	860*	346	3,816
Social	540	230	92	862	620	260	106	986
All tenure	2,810	980	392	4,182	3,230	1,120	452	4,802

*Note: Taken from Clydeplan schedule 10.

Housing land supply to 2031

14. In order to identify the current contribution towards meeting the housing land requirement I agree with parties that the number of completions from the established supply since 2012 should be removed – a figure of 1,812 homes (as taken from the agreed 2019 housing land audit). I note that 21 social homes were demolished in the period 2012 to 2019. However, these were vacant properties and it is unclear at what point they became vacant; and, furthermore, these were part of the existing housing stock rather than the established supply. Consequently, I find the loss of this stock should not be, in these circumstances, accounted for in calculating the contribution towards meeting the housing land requirement. Therefore, the outstanding housing land requirement for East Renfrewshire in the period 2012 to 2024 is 1,418 homes (3,230 minus 1,812 completions). The housing land requirement for the period 2024 to 2029 is as stated in Clydeplan as 1,120 homes with an extrapolated housing land requirement of 452 homes for the period 2029 to 2031.

15. To understand whether the outstanding housing land requirement for the remainder of the 2012 to 2024 period, and periods beyond, would be met I turn to the advice within Scottish Planning Policy that “the housing land requirement can be met from a number of

sources, most notably sites from the established supply which are effective or expected to become effective in the plan period, sites with planning permission, proposed new land allocations, and in some cases a proportion of windfall development”.

16. The council has opted not to rely on any windfall to meet the housing land requirement. However, as identified in paragraph 8 above, if taken into account this source would account for some 57 homes per year.

17. The agreed 2019 housing land audit programmes the delivery of 2,547 effective (or expected to be effective) homes from 2019/20 to 2025/26 (with 1,954 in the period 2019/20 to 2023/24 and 593 in the period 2024/25 to 2025/26).

18. Parties are in dispute over the programming of housing delivery beyond 2026. The council assumes continued delivery on sites programmed to deliver in the period up to, and beyond, 2025/26 together with contributions from other allocated sites which are not programmed to deliver until beyond 2026 but are expected by the council to deliver. This contrasts with Geddes Consulting and others whom only extend the programming of sites due to deliver in the period up to 2025/26 and beyond.

19. The council suggest that the level of programming assumed by Geddes Consulting is low compared to annual build rates (129 homes compared to 259 homes per year) and takes no account of local knowledge or discussions. In further written submissions the council also confirms that in its programming beyond 2026 some 86% of the housing sites have developer interest with the council in active discussion with the landowners of the remaining sites about delivery; argues that Homes for Scotland has not objected to the inclusion of these sites as non-effective; and provides a detailed site update indicating progress on sites. Ultimately, the council argue that there is no evidence why the sites identified could not deliver post 2026.

20. Geddes Consulting is critical of the council’s approach questioning the assumptions of delivery on 10 sites presumed by the council to deliver 342 homes, specifically in terms of effectiveness and whether programing is agreed with a relevant house-builder.

21. I appreciate that Geddes Consulting acts on behalf of a consortium of house-builders and others share its view on programming. However, anticipating housing delivery beyond the effective period of five years is a prediction rather than a guarantee. Scottish Planning Policy refers to the allocation of sites which are “effective or expected to become effective in the plan period to meet the housing land requirement” and suggests that “in allocating sites, planning authorities should be confident that land can be brought forward for development within the plan period” (paragraph 119). In this case, the council is confident that the allocated sites could deliver post 2026; the majority of allocations are in the hands of house-builders or willing landowners; and the council has provided a detailed update on each site proving a sound basis to support the notion that these sites would deliver in the period beyond 2026. In addition, the programming from the council aligns with the average annual build rates across the authority. For these reasons, I find favour with the council’s programming of sites beyond 2026.

22. The table below shows the housing situation using the council’s extrapolation method and its programming (with the Geddes Consulting programming in brackets). It is notable that despite a shortfall in the 2029 to 2031 period both figures would result in a surplus all tenure and private housing land supply; and, as indicated below, would likely ensure the maintenance of a five year effective housing land supply.

East Renfrewshire housing land supply 2012-2031 - Council (Geddes Consulting) figures

	2012-2024			2024-2029			2029-2031		
	All tenure	Private	Social	All tenure	Private	Social	All tenure	Private	Social
HST	2,810	2,270	540	980	750	230	392	300	92
HLR	3,230	2,610	620	1,120	860	260	452*	346	106
Completions	1,812	1,507	305	0	0	0	0	0	0
Outstanding	1,418	1,103	315	1,120	860	260	452	346	106
Established Supply**	1,954	1,608	346	1,420 (1,150)	1282 (1,107)	138 (43)	162 (90)	162 (90)	0 (0)
+/-	+536	+505	+31	+300 (+30)	+422 (+247)	-122 (-217)	-290 (-362)	-184 (-256)	-106 (-106)
Clydeplan period 2012-2029	+836 all tenure / +927 private / -91 social (+566 all tenure / +752 private / -186 social)								
LDP period 2012-2031	+546 all tenure / +743 private / -197 social (+204 all tenure / +496 private / -292 social)								

* 2029-2031 figures derived from the council's extrapolation method (average of the 2024-2029 HLR).

** Established supply taken from the agreed HLA 2019 with programming to 2025/26. Programming beyond 2025/26 taken from the council's figures in its background report; or from the Geddes Consulting Report.

23. I agree with parties that the housing supply targets and housing land requirement set by Clydeplan are not caps. There is scope to allocate more land for housing where circumstances allow. That is evident from the fact that in East Renfrewshire there are sufficient housing allocations to meet, and exceed, the all tenure and private housing land requirement for the period 2012 to 2029 and to meet the extrapolated all tenure and private requirements to 2031. I appreciate that the supply of social housing is in deficit compared to the requirement from 2024 onwards. The allocation of additional housing land could bolster the provision of social housing through the policy position of requiring 25% affordable housing on private sites. However, paragraph 6.60 of Clydeplan states that “new housing provided in any tenure will contribute to meeting the overall Housing Supply Targets”. In addition, I note from page 94 of the proposed plan that there is uncertainty over the delivery of social housing beyond 2021 as the last funding from the Scottish Government to East Renfrewshire was to run until 2021 with the council's Strategic Housing Investment Plan 2020-25 only able to assume that similar funding would continue beyond 2021. This indicates the potential for additional delivery once funding is confirmed. Consequently, in this case, I do not consider it necessary to release further housing through the examination to meet the social housing deficit.

24. There is a predicted reduction in housing delivery in the period 2024-2031, primarily in the period beyond 2026, but delivery in this period and clarity on the effectiveness of sites should come from future agreed housing land audits. In addition, these calculations do not account for a windfall allowance (which at 57 homes per year is significant). Furthermore, a review of the local development plan should occur in advance of 2031 allowing further housing allocation if required at that stage. In the meantime, I am satisfied from my conclusions that the plan makes provision for a five year effective land supply. Therefore, I am not persuaded that allocation of additional housing land through the proposed plan would be appropriate or reasonable.

25. As promoted by the council in its response above, and through written submissions, it is agreed that the proposed plan should reflect the fact that the plan period is until 2031 not 2029. Consequently, references to the plan period being until 2029, and associated changes to housing schedules, should be updated as recommended below.

Housing market and sub-market areas

26. Scottish Planning Policy suggests that plans “should set out the housing supply target (separated into affordable and market sector) for each functional housing market area”.

27. Paragraph 6.45 of Clydeplan explains that “different analytical approaches have been developed to reflect the different geographical frameworks for private and social sector housing. The social sector is based on Local Authority boundaries, which is the geography within which this housing need generally presents and is met. The private sector is based on a Housing Market Area framework (Diagram 5) which reflects how housing choices are exercised across administrative boundaries”. Diagram 5 shows three tiers of housing market areas: (tier 1) the Glasgow conurbation covering the entire strategic plan area; (tier 2) an eastern conurbation and a separate central conurbation (within which East Renfrewshire is located); and (tier 3) 11 housing sub-market areas (two of which cover East Renfrewshire – Greater Glasgow South and Renfrewshire). In these circumstances, I consider that the “functional housing market area” differs depending on housing tenure with the social sector covering the local authority boundary and the private sector falling to housing sub-market areas. This basis was endorsed by parties in further written submissions.

28. Identification of the social sector housing figures at a local authority level is simple as Clydeplan sets that data out in schedule 7 (all tenure housing supply targets by local authority) and schedule 8 (all tenure housing land requirement by local authority). However, as indicated in my findings below, it is not possible to align the functional housing market areas of the private and social sectors. Yet, it is possible to illustrate the housing figures at the local authority level (as promoted by the council).

29. Clydeplan sets out the housing supply targets and housing land requirement for the private sector by housing sub-market area; and policy 8 stipulates that local authorities should “make provisions in Local Development Plans for the all tenure Housing Land Requirement by Local Authority set out in Schedule 8, for the Private Housing Land Requirement by Sub-Market Area set out in Schedule 9 and for the Private Housing Land Requirement by Local Authority set out in Schedule 10”.

30. The private housing sub-market areas do not all follow local authority boundaries. In East Renfrewshire there are two housing sub-market areas: Greater Glasgow South (incorporating parts of East Renfrewshire, Glasgow City and South Lanarkshire); and Renfrewshire (including parts of East Renfrewshire and Inverclyde and all of Renfrewshire). To be consistent with the strategic development plan there is an onus on local development plans to make provisions to meet the private housing land requirement by housing sub-market area. This indicates to me a responsibility on individual authorities to meet a share of the requirement. However the exact nature is not defined in Clydeplan nor any precise indication as to whether or how the figure could be split. Clydeplan does not assist with this as it does not disaggregate the housing sub-market area figures to particular local authorities.

31. The identification of a proportion assigned to East Renfrewshire of the private sector housing supply targets and housing land requirement by housing sub-market areas (and whether that proportion could be met by housing allocations) would involve making assumptions and coming to a judgement on how much each local authority within each housing sub-market area should be assigned.

32. In their further written submissions, Homes for Scotland and Geddes Consulting provide a break-down of the private sector housing land supply for the Renfrewshire and Greater Glasgow housing sub-market areas with figures given at the local authority level. However, it is unclear as to how this data was derived or amalgamated. There is nothing to suggest the figures provided at this level are agreed with the respective local authorities as accurate. The council suggests that background documentation to Clydeplan provides a break-down of housing figures at local authority levels which were used as geographical building blocks to inform decisions regarding housing. However, those figures are not established in Clydeplan. In this case the council presents no method for disaggregating the Clydeplan figures into a specific requirement. In these circumstances and given the evidence provided, the specific disaggregation of a housing requirement is not something on which I consider this examination can reasonably conclude. Nevertheless, as stated above, the sub-market area requirement is not set aside and Clydeplan requires it to be met by the constituent authorities.

33. On that matter I have considered whether there would be sufficient provision to meet the private housing land requirement for the housing sub-market areas overall. I agree with the council that, in general, monitoring of these figures is best achieved at the regional level through Clydeplan and the future Regional Spatial Strategy for the area. Based on 2013 data schedule 9 of Clydeplan identifies a predicted surplus in the Renfrewshire housing sub-market area of 1,650 private homes for the period 2012 to 2029; and a surplus of 2,090 private homes in the Greater Glasgow South housing sub-market area. In compiling an update based on agreed 2018 housing land audit data (as set out in the updated background report and within the council's response above), East Renfrewshire Council identify that across the administrative boundaries there would continue to be a surplus in private housing to meet the Clydeplan 2012-2029 housing land requirement for Renfrewshire and Greater Glasgow South housing sub-market areas.

34. Within their further written submissions, Geddes Consulting and Homes for Scotland provide amalgamated data from housing land audits and extrapolated completions which show the private housing land supply 2012-2031 position in both the Renfrewshire and Greater Glasgow housing sub-market areas. These show a surplus in the private housing land supply 2012-2031 for Renfrewshire housing sub-market area; a surplus in the Greater Glasgow housing sub-market area 2012-2029; but a shortfall in the Greater Glasgow housing sub-market area in the period 2029 to 2031 (some 696 homes). The analysis from these parties confirms the council's position that the private housing land requirement at housing sub-market areas would be met for the 2012-2029 period. Policy 8 only refers to the requirement to 2029 and not an extrapolated period to 2031. Consequently, whether a deficit would occur in the period beyond 2029 is not pertinent to compliance with the provisions of policy 8.

35. Pulling the above findings together, evidence submitted to this examination does not indicate clearly how housing figures could be disaggregated to housing sub-market areas. In any event, monitoring gives confidence that the requirement for the housing sub-market areas would be met in consistency with Clydeplan. Although it is not possible to illustrate the proportion of the private housing land requirement allocated to each housing sub-market area, the proposed plan would promote housing that would contribute to meeting the private housing land requirement as presented in schedule 9 of Clydeplan. I consider that this approach would be sufficient to accord with policy 8 of Clydeplan. Illustrating within the proposed plan how the all tenure and private housing land requirement would be met at the local authority level would align with schedules 8

and 9 referred to in policy 8. Consequently, in this case, I do not recommend inclusion of a specific sub-market area requirement in the plan.

36. In the context of my conclusions, and the evidence submitted to this examination, I find it reasonable for the proposed plan to identify the housing supply targets and housing land requirement at a local authority level and how the requirement is predicted to be met in a single table as is currently shown in table 2 (monitoring of the housing land supply 2012-2029) of the plan with slight revisions recommended to show the extrapolated period to 2031.

37. In further written submissions parties requested various typographical changes to the table and footnotes to be inserted. I have agreed with many promoted by the council in relation to headings and footnotes. However, I have opted to retain reference to “established supply” as that term is used in Scottish Planning Policy (rather than “established land supply” promoted by the council). The request from Geddes Consulting to rename this row to refer to programmed supply is overcome by reference to programming in the footnotes. I have also retained reference to the “LDP period 2012-2031” as opposed to “LDP monitoring 2012-2031” suggested by the council as this is the period covered by the proposed plan.

5-year land supply

38. Geddes Consulting and Mactaggart and Mickel submitted a recent court decision – *Graham’s the family dairy (property) and Mactaggart and Mickel Homes Limited v the Scottish Ministers [2021] COSH74* – very late in the examination proceedings. I understand that this decision means that subject to any further legal process the 2020 revision to Scottish Planning Policy and the accompanying Planning Advice Note 1/2020 are now quashed. I have not sought further information on this matter as the original representations refer to Scottish Planning Policy (2014) and I did not require any response in relation to the decision’s application to development planning. Both the revised 2020 and 2014 versions require that local development plans within city regions should “provide for a minimum 5 years effective land supply at all times”.

39. The council states in its response above that parties object to its approach to calculating whether a five year effective housing land supply would be maintained. However, no unresolved representation to the proposed plan is made on this point instead parties question the effective supply methodology shown in the council’s housing background report rather than the content of the plan itself.

40. Gladman questions whether a five year effective housing land supply would be maintained within the Levern Valley area which I deal with below. I note that the response from Geddes Consulting suggests that “it is expected that the proposed development strategy will maintain a five year effective land supply at all times”. That response was given in the context of Scottish Planning Policy (2014). The council’s background report refers to both the average and compound methods to calculate the five year effective housing land supply demonstrating that an effective supply would be maintained. In applying the compound method it uses the housing supply target to calculate whether a five year effective supply would be maintained. Substituting the housing land requirement would still result in a five year effective housing land supply being maintained for the periods 2019-2024, 2020-2025 and 2021-2026. I have taken these findings into account. My conclusions would continue to align with the provisions of Scottish Planning Policy (2014). From the above, I consider that an adequate housing

land supply would be demonstrated in both the 2014 and 2020 Scottish Planning Policy contexts. No change to the proposed plan is required in relation to this matter.

Policy SG1: Housing supply, delivery and phasing

41. Clydeplan policy 8 states that “local authorities should take steps to remedy any shortfalls in the five-year supply of effective housing land through the granting of planning permission for housing developments, on greenfield or brownfield sites, subject to satisfying” set criteria. In addition, Clydeplan policy 1 (placemaking) requires proposals to take account of placemaking principles including supporting “the ‘compact city’ model with priority given to brownfield locations”. This principle aligns with that stated in Scottish Planning Policy that decisions should be guided by, amongst other matters, “considering the re-use or re-development of brownfield land before new development takes place on greenfield sites”. In this context, I agree with the council that the approach taken in policy SG1 (housing supply, delivery and phasing) of the proposed local development plan to give preference to brownfield sites before considering the release of greenfield sites, where a shortfall exists, is appropriate and reasonable. This finding is supported by the fact that Clydeplan policy 8 does not preclude prioritisation. I find that the text referring to brownfield preference should be retained in proposed policy SG1. Furthermore, my recommendation in Issue 8 (green belt) to insert a housing release statement into policy D3 (green belt and countryside around towns) explicitly makes reference to the provisions of policy SG1 to ensure cross-referencing when assessing greenfield housing proposals.

42. Decisions on whether to release land for housing and grant planning permission where a housing shortfall is established would be assessed against Clydeplan policy 8. However, it does not necessarily follow that the release policy with the proposed local development plan must repeat or mimic exactly the criteria stated within Clydeplan policy 8 as that would result in unnecessary repetition of development plan provisions. What is required in the Town and Country Planning (Scotland) Act 1997 (as amended) is that the local development plan is “consistent” with the strategic development plan. Scottish Planning Policy also requires that development plans are consistent with the policies set out in it. I find that the wording of proposed policy SG1 relating to development being of an appropriate scale; demonstrating positive social, economic and environmental benefits; and ensuring no prejudice to the delivery of allocated housing sites is appropriate and not inconsistent with the provisions of Clydeplan or Scottish Planning Policy. Consequently, I disagree with parties which request that these parts of policy SG1 are deleted.

43. However, I agree with parties (and the council) that it would be appropriate for the text of policy SG1 to refer to the plan period to 2031; to remove reference to the provision of a minimum number of homes; and to clarify the relationship with Clydeplan. This would improve the clarity of the policy. Yet, the wording suggested by parties could imply that the Clydeplan housing land requirement extends to 2031 when that is not the case as it runs from 2012 to 2029 with an extrapolated period (to align with Scottish Planning Policy) to 2031. To ensure clarity on this matter, I recommend that reference to the requirements of Scottish Planning Policy are also inserted into policy SG1. This change was endorsed by parties through further written submissions.

44. Parties also ask for changes to the wording of the supporting text relating to policy SG1. As concluded above, I agree that the wording should reflect the plan period to 2031 and recommendations are provided to modify these entries. I also agree that

specific reference to the housing land requirement stated in brackets in the second paragraph on page 93 is repetitive and being unnecessary should be deleted. The word “continuous” in the third paragraph on this page where it states that a “continuous 5 year effective housing land supply is maintained” aligns with the statement in Scottish Planning Policy (paragraph 119) that plans should provide a 5 year effective land supply “at all times” and, therefore, that word should remain. The reference to the requirements of Scottish Planning Policy, and not Clydeplan, in the third paragraph is appropriate and should be retained as it refers directly to what national policy states. Further minor amendments to the third paragraph on page 93 are recommended following suggestions from parties to aid readability. The directness in relation to the findings of the background report and education situation on page 94 of the proposed plan are appropriate as statements of the council’s findings and do not need to be caveated as requested by parties.

Levern Valley (and Eastwood)

45. I recognise that the council and other parties have provided housing land requirement information for the defined areas within East Renfrewshire of Eastwood and the Levern Valley. The council indicates in written submissions that it did this only in response to the submissions from parties. While the information submitted suggests a private housing shortfall in the Levern Valley area (99 homes) to 2024 the council identifies that there would be a surplus in the period to 2031 (the period covered by the plan). Consequently, there is insufficient justification on this basis to release land for housing within the Levern Valley area. No shortfalls have been identified for the Eastwood area.

46. In any case, and fundamentally in relation to consistency with the strategic development plan, there is no requirement within Clydeplan to meet a housing land requirement for the Levern Valley or Eastwood parts of East Renfrewshire. I have set out my conclusions above as to the assumptions involved in seeking to disaggregate the housing numbers and the lack of evidence provided in this case to support such an approach. Levern Valley is not a functional housing market area but a refined part of the wider Renfrewshire housing sub-market area where the housing land requirement is due to be met from the housing land supply in East Renfrewshire, Renfrewshire and Inverclyde. Consequently, as stated above, there is no basis to identify a shortfall in the smaller defined Levern Valley and, in any event, it is clear from the submissions that there is a supply of land from this area to contribute to the wider housing sub-market area. No additional allocations are required in response to this unresolved matter.

47. Following my conclusions in paragraph 8 above, and those in Issue 2 (development strategy) and Issue 13 (community and education facilities and infrastructure), I further agree with the response from the council that there is insufficient education capacity at present to entertain any further allocations in the Levern Valley area or Uplawmoor. However, as concluded in my findings within Issue 2, housing could be accommodated on windfall sites (or others should a shortfall in the five year effective housing land supply be established) where impacts on infrastructure were sufficiently addressed. At present, additional allocations over those promoted in the proposed plan could not be readily accommodated and are not required to meet the housing land requirement. For the reasons above, I do not agree that further allocations in Levern Valley area are necessary or would alleviate pressure on house building in the Eastwood area of East Renfrewshire.

Housing mix and affordable housing

48. The matter of “affordability” is dealt with in paragraph 6 above. Furthermore, I agree with the council that the proposed plan provides a suitable framework to allow the allocation and delivery of affordable housing throughout the authority. There is no justification to increase private housing allocations in order to promote additional affordable provision.

Economic benefits of housebuilding

49. As concluded in my findings in paragraphs 6 and 7 above, the non-allocation of additional housing sites would not restrict economic growth and would not be in violation of the provisions of Scottish Planning Policy to support economic growth. The argument to provide additional housing to further support the economy is not justified in this case.

Reporter’s recommendations:

Modify the proposed local development plan by:

1. Replacing the first paragraph of Policy SG1: Housing Supply, Delivery and Phasing on page 96 as follows:

“To deliver housing needs across all tenures up to 2031 the Proposed Plan provides a range and choice of housing sites and supports the delivery of sustainable mixed communities. Provision is made for the housing land requirement (set out in Table 1) and associated infrastructure to be delivered between 2012 to 2031 to comply with Clydeplan, the requirements of Scottish Planning Policy and in accordance with Strategic Policy 1.”.

2. Replacing the first sentence within the first paragraph on page 94 with the following:

“The Background Report and Table 1 clearly show that there is sufficient land supply to meet the Housing Land Requirement of Clydeplan to 2029 and the extrapolated requirement to 2031.”.

3. Replacing references to “2029” with “2031” in:

- The supporting text on page 24 (paragraphs 2, 3 and 4).
- The supporting text on page 35 (paragraph 1).
- Policy M2.2: M77 Strategic Development Opportunity – Barrhead South – Springhill, Springfield, Lyoncross on page 40 (criterion 1a).
- Policy M3: Barrhead North – Strategic Development Opportunity – Shanks/Glasgow Road, Barrhead on page 43 (criteria 3a, 4ci, 4cii, 5a and 5b).

4. Replacing the title on page 93 with “How Many New Homes are Needed by 2031?”.

5. Deleting the text “(4350 units 2012-29)” from the second paragraph on page 93.

6. Removing the word “also”, and replacing the word “is” with “are”, in the first sentence of the third paragraph on page 93.

7. Replacing tables 1 and 2 on pages 93 and 95 respectively with the following Table 1:

Table 1: East Renfrewshire Housing Land Supply 2012-2031

	2012-2024			2024-2029			2029-2031		
	All tenure	Private	Social*	All tenure	Private	Social*	All tenure	Private	Social*
a) HST	2,810	2,270	540	980	750	230	392	300	92
b) HLR	3,230	2,610	620	1,120	860	260	452	346	106
c) Completions	1,812	1,507	305	0	0	0	0	0	0
d) Outstanding HLR (b-c)	1,418	1,103	315	1,120	860	260	452	346	106
e) Established Supply	1,954	1,608	346	1,420	1,282	138	162	162	0
+/-	+536	+505	+31	+300	+422	-122	-290	-183	-106
Clydeplan period 2012-2029	+836 all tenure / +927 private / -91 social								
LDP period 2012-2031	+546 all tenure / +743 private / -197 social								

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

Notes to Table 1:

a) Housing Supply Targets (HST) (Schedule 7 Clydeplan).

b) Housing Land Requirement (HLR) (HSTs +15% generosity) (Schedule 8 Clydeplan) and 2029-2031 figures derived from the council's extrapolation method (average of the 2024 to 2029 HLR).

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

* Comprises sites allocated for 100% social rent/below market rent under schedule 16 and where social sector capacity known for sites with planning consent.

8. Amending the headings in Schedule 15: Housing Sites on pages 100-103, and Schedule 16: Affordable Housing and Housing for Particular Needs on page 104, to read "Established Land Supply 2019-31" and "Land Supply Post 2031".

9. Replacing the Established Land Supply 2019-31 from "144" to "192" and Land Supply Post 2031 from "136" to "88" for site SG1.9 (Springfield Road, Barrhead) in Schedule 15: Housing Sites on page 101.

10. Replacing the Established Land Supply 2019-31 from "376" to "400" and Land Supply Post 2031 from "24" to "0" for site SG1.10 (Shanks Park, Barrhead) in Schedule 15: Housing Sites on page 101.

11. Replacing the Established Land Supply 2019-31 from "622" to "672" and Land Supply Post 2031 from "50" to "0" for site SG1.25 (Maidenhill, Newton Mearns) in Schedule 15: Housing Sites on page 102.

Issue 15	Housing Supply Barrhead	
Development plan reference:	Policy SG1: Housing Supply, Delivery and Phasing	Reporter: Alison Kirkwood
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Emma Holliday (10/1) David Reid (18/1) SEPA (492/4)</p>		
Provision of the development plan to which the issue relates:	<p>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</p>	
Planning authority’s summary of the representation(s):		
<p><u>(a) Schedule 15 - Proposal SG1.10 Shanks Park</u></p> <p><u>Support</u></p> <p><u>SEPA (492/4)</u></p> <ul style="list-style-type: none"> • Support for deculverting the Bridgebar Burn in site SG 1.10 Shanks Park. <p><u>Objections</u></p> <p><u>David Reid (18/1)</u></p> <ul style="list-style-type: none"> • The proposed housing development backs right onto the rear of property. • 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? • 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? • 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? <p><u>(b) Schedule 15 - Proposal SG1.11 North Darnley Road</u></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 fom 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 appropraite time.
- It is not proposed to modify the Plan based on the above.

Objections

David Reid (18/1)

- The site forms part of the Shanks/Glasgow Road master plan area SPG under Policy M3 (CD/07). The site is a large brownfield former industrial area and forms an essential element of the future growth and regenerataion of Barrhead.
- The site was allocated for residential development in the adopted LDP1 (CD/01) 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 (2017/0756/TP) (CD/60). 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

Emma Holliday (10/1)

- 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:

Schedule 15 - Proposal SG1.10 Shanks Park

1. The Scottish Environment Protection Agency's support for the opening up of the culverted Bridgebar burn, as part of proposal SG1.10 at Shanks Park, is noted. This does not require any modification to the proposed plan.
2. The issues raised by Mr Reid relate to the details of how the Shanks Park site will be developed and the implications for residents at Victoria Place, which is located to the west of the site. The council has referred to planning application 2017/0756/TP, which seeks planning permission in principle for residential development on the site. I note that the council is minded to grant permission, subject to conditions and a legal agreement to secure planning obligations. Some of the matters included in Mr Reid's questions are covered in the proposed conditions listed at the end of the report of handling (core document CD/60). Further detailed applications would be required covering matters such as site layout, access and landscaping and there would be an opportunity for Mr Reid and other interested parties to submit representations on these.
3. Pest control is not a planning matter. The council's environmental health service may be able to assist with Mr Reid's concerns.
4. No modifications to the plan are required in response to this representation.

Schedule 15 - Proposal SG1.11 North Darnley Road

5. The proposed housing site at North Darnley Road is not covered by any of the environmental designations included in schedule 5 (natural environment) of the proposed plan. In its response to a further information request, the council has confirmed that there is not a local biodiversity site designation next to the site. An ecological appraisal would therefore not be required as part of a future planning application for housing development.
6. Ms Holliday is concerned that there is only a limited amount of wild green space left in Barrhead. Land to the north and east of the site lies within the green belt and forms part of the green network. However, this site was removed from the green belt in the previous local development plan and continues to be promoted in the proposed plan.
7. The council has explained that the site is identified as a smaller scale housing development opportunity that would contribute to the wider aims of the Barrhead North master plan (policy M3). The site is programmed in the post 2031 period because there is no active developer interest and it is not a council priority for affordable housing

funding. Due to its programming post 2031, the site does not contribute to meeting the housing land requirements of the strategic development plan (Clydeplan, 2017) and strategic policy 1 in the proposed plan. However, in the event of a shortfall in the five year effective housing land supply, sites such as this which are programmed in the longer term, could be brought forward.

8. Policy D8 (sustainable transport networks) in the proposed plan states that the council will support the implementation of the proposals listed in schedule 6 (sustainable transport networks and access projects). It also states that proposals will be required to connect to existing walking, cycling and green networks. There is a core path (proposal D8.1 in schedule 6) and a right of way (proposal D8.2 in schedule 6) running through the site, which connect with the wider green network. Archway features at the entrances to the site on Darnley Road and Dovecothall Street indicate that these routes form part of the Lavern Walkway.

9. Future housing proposals would be expected to address the requirements of policy D8, which may also provide the opportunity to retain features of natural and biodiversity value associated with the existing footpaths. To ensure future developers are aware of the relevance of policy D8, a cross reference to this policy in schedule 15 (housing sites) is recommended.

10. I agree with the council that the impact of development on high quality trees and protected species could be mitigated at planning application stage through the requirement to undertake appropriate surveys and an arboriculture assessment. Given its overgrown nature and proximity to the green network to the north and east, I am not surprised that foxes and deer have been seen on the site. However, these are not protected species and their presence on the site would not in itself justify the deletion of a longstanding housing proposal.

11. The site forms part of the established housing land supply and none of the matters raised in Ms Holliday’s representation would justify removal of the allocation.

12. The council has indicated that a cross reference to policy M3: Barrhead North in schedule 15 would be helpful to explain that proposal SG1.11 is part of this strategic development opportunity. As the North Darnley Road site is specifically mentioned in policy M3, I consider this to be a minor editing change which the council would be entitled to make itself following the examination. The same principle would apply to proposals SG1.12 and SG1.13.

13. With the exception of a minor addition to schedule 15, no modifications are necessary in relation to housing proposal SG1.11.

Reporter’s recommendations:

Modify the proposed local development plan by:

1. Adding the words “Policy D8” to the notes column for site reference SG1.11 in schedule 15 (housing sites) on page 101.

Issue 16	Housing Supply, Busby	
Development Plan reference:	Policy SG1: Housing Supply, Delivery and Phasing	Reporter: Gordon S Reid
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Catherine Doherty (3/1) Raymond Doherty (4/1) Darren Doherty (5/1) Paul Doherty (6/1)</p>		
Provision of the development plan to which the issue relates:	<p>Schedule 16: Affordable Housing and Housing for Particular Needs. SG4.2 – Easterton Avenue Page 104</p>	
Planning authority's summary of the representation(s):		
<p><u>Schedule 16 - Proposal SG4.2 - Easterton Avenue, Busby</u></p> <p><u>Objections</u></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"> • Traffic implications (including parking, junction/access concerns). • Health concerns next to electricity sub-station • Loss farmland and wildlife. • Brownfield land on Main St. Busby to be developed in preference. • Health and education facilities at full capacity. • Increased crime 		
Modifications sought by those submitting representations:		
<p><u>Schedule 16 - Proposal SG4.2 - Easterton Avenue, Busby</u></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"> • Remove SG4.2 from Schedule 16: Affordable Housing and Housing for Particular Needs and on the associated Proposals Map. • Re-designate the site as Green Belt under Policy D3. 		
Summary of responses (including reasons) by planning authority:		
<p><u>Schedule 16 - Proposal SG4.2 - Easterton Avenue, Busby</u></p> <p><u>Objections</u></p>		

Catherine Doherty (3/1), Raymond Doherty (4/1), Darren Doherty (5/1), Paul Doherty (6/1)

- 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/01) 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 programming set out in the Housing Land Audit (2019) (CD/51) and the Action Programme (CD/29). Funding has not been assigned to the site in the latest Strategic Housing Investment Plan (CD/46).
- There is a significant pressure for affordable housing throughout the Council area. The current Strategic HNDA (CD/81) 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/45) 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:

Site SG 4.2 Easterton Avenue

1. The allocated affordable housing site lies adjacent to the southern boundary of the settlement of Busby and is a relatively self-contained triangular shaped area of agricultural land within the designated green belt. In terms of the impact on the green belt, I note from the council's 'Green Belt Landscape Character Assessment Report' that the site is within Landscape Character Area ULF2 (Busbyside) an area of low landscape sensitivity, medium visual sensitivity and moderate green belt sensitivity. I consider that the development of the site would form a small but logical extension to the settlement boundary without any significant loss to the designated green belt. In addition, I am satisfied that there would be minimal impact on the visual quality of the area and no significant encroachment between Busby and Thorntonhall (which lies some 500 metres to the south-east). The proposed access to the site would be taken from Station Road, which serves the existing residential area and connects directly to East Kilbride Road. Although there is some on-street parking the existing road and junctions appear to be of an appropriate standard to accommodate the additional 20 houses proposed.

2. Representations from residents contend that brownfield land on Main Street, Busby

should be developed for affordable housing in preference to this green belt site. I note that a site is already allocated within the proposed plan on Main Street (proposal SG 4.3) for 20 affordable homes. As identified in Issue 14 (housing supply, delivery and phasing), there is a requirement for affordable housing across the plan period to 2031 which both these allocated sites would contribute to meeting. The presence of the allocated site in Main Street would not remove the need for the development of the site (SG 4.2) at Easterton Avenue. In addition, as the site is allocated in the proposed plan account has been taken of the likely education and healthcare requirements, which can be accommodated.

3. In terms of the matters raised in relation to the potential for increased crime and the impact on existing wildlife I am satisfied that through the careful design of the layout and the use of landscaping to reinforce the existing hedgerows these matters can satisfactorily addressed. Concerns in terms of health implications relating to the location of the electricity switching station would be more appropriately addressed at the detailed planning permission stage and do not prevent allocation of the site.

4. I am satisfied that proposed site SG 4.2 Easterton Avenue should remain in the proposed plan for the allocation of 20 affordable homes, with the green belt status retained until the site is developed.

Reporter's recommendations:

No modifications.

Issue 17	Housing Supply Giffnock	
Development plan reference:	Policy SG1: Housing Supply, Delivery and Phasing	Reporter: Alison Kirkwood
Body or person(s) submitting a representation raising the issue (including reference number):		
Hazel Smyth (1/1) Mactaggart & Mickel (461/1) SEPA (492/7)		
Provision of the development plan to which the issue relates:	Schedule 15: Housing Sites Schedule 16: Affordable Housing and Housing for Particular Needs. SG1.21 Robslee Drive, Giffnock SG4.4 Burnfield Road Giffnock	
Planning authority's summary of the representation(s):		
<p><u>(a) Schedule 15 - Proposal SG1.21 - Robslee Drive, Giffnock</u></p> <p><u>Objections</u></p> <p><u>Mactaggart & Mickel (461/1)</u></p> <ul style="list-style-type: none"> • The site is allocated for residential development in the adopted LDP under site ref. SG1.15. Mac&Mic continue to support the allocation of the site for residential development under site ref. SG1.15 in the Proposed LDP2. • Remain committed to bringing forward a planning application for residential development over this site as soon as possible. • 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. • 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. • 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. • 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. 		

SEPA (492/7)

- 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 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 16 – SG4.4- Burnfield Road, Giffnock

Objections

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, Giffnock

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 16 - SG4.4 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 associated Proposals Map.

Summary of responses (including reasons) by planning authority:

(a) Schedule 15 - Proposal SG1.21 - Robslee Drive, Giffnock

Objections

Mactaggart & 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/05).

- The Proposed Plan and 2019 Housing Land Audit (HLA) (CD/51) 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 16 – SG4.4 - Burnfield Road, Giffnock

Objections

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/51). Funding has not been assigned to the site in the latest Strategic Housing Investment Plan (CD/46).
- There is a significant pressure for affordable housing throughout the Council area. The current Strategic HNDA (CD/81) 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/45) and the Proposed Plan continue to address this issue.

- The Council's view is that Site SG4.4 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 and shown in the revised site plan (CD/87).

Reporter's conclusions:

Schedule 15 - Proposal SG1.15 - Robslee Drive, Giffnock

1. The reference number for the housing proposal at Robslee Drive in the proposed plan is SG1.15, not SG1.21 as stated in the above sections.
2. Robslee Drive is a longstanding housing proposal, the boundaries of which were amended following the previous local development plan examination, in response to a representation from the Scottish Environment Protection Agency (SEPA). An area of land identified as being at risk from flooding was removed from the site, which resulted in a housing allocation comprising two separate parts. The same boundaries have been rolled forward into the proposed plan.
3. The representation from Mactaggart and Mickel seeks to amend the site boundaries to include the area of land which was removed following the previous examination. The wider site was included in the housing site evaluation assessment (site CS030).
4. Site CS030 is bound to the north by the railway line and the south by existing development, and is bisected by a core path which runs in a north – south direction along Robslee Drive. The western part of site CS030 (including part of proposal SG1.15) is included in the green network and a local biodiversity site on the proposals map of the proposed plan.
5. On my site inspection, I could see no obvious features on the ground which mark the delineation between the parts of site CS030 which are covered by proposal SG1.15 and those which are excluded.
6. In response to a further information request, the council provided an extract from the SEPA river flooding map relevant to this site. This confirms that the part of site CS030 which has been excluded from proposal SG1.15 coincides with the area of high flood risk shown on the SEPA map. This means that the annual probability of flooding is 10% (1 in 10 years). No evidence has been provided to suggest that there are any other reasons for excluding this land from the housing allocation.
7. Paragraph 263 of Scottish Planning Policy indicates that land of medium to high risk of flooding (greater than 1 in 200 years or 0.5% annual probability) may be suitable for residential development within built up areas, where flood protection measures exist or are planned. In this case, there are no flood protection measures on the site and I am not aware of any scheme in the pipeline. SEPA's position that no development should

take place within the 1 in 200 year floodplain is therefore consistent with Scottish Planning Policy.

8. I recognise that the approach taken in the adopted local development plan to managing flood risk on the site was one way of addressing this matter. However, it is my understanding that the SEPA flood maps are indicative and of a strategic nature, and are not intended to be used to identify the exact extent of land at risk of flooding.

9. I agree with Mactaggart and Mickel that widening the extent of the allocated site would not prejudice the full consideration of matters relating to flood risk. Regardless of whether the site boundaries are amended or not, a detailed flood risk assessment would be required as part of a planning application for proposal SG1.15. The flood risk assessment would identify the exact area of the 1 in 200 floodplain, on which built development would not be permitted. It may also need to identify measures to protect against or manage flood risk. This assessment would inform the layout and design of the development, alongside other relevant considerations such as the core path, local biodiversity site and green network designations.

10. The council suggests 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. However, until a detailed flood risk assessment is undertaken, the exact boundaries of the flood risk areas would not be known.

11. I consider that amending the boundaries of proposal SG1.15 to cover the wider site CS030 would result in more efficient use of the land and provide greater flexibility to address the flood risk constraint and meet the requirements of policy D1 (placemaking and design).

12. A modification to the proposed plan is recommended to amend the site boundary of proposal SG1.15 on the proposals map to align with site CS030 in the site evaluation report. To ensure future developers are aware of the flood risk constraint, it is recommended that text is added to proposal SG1.15 in schedule 15 (housing sites) to explain that no development shall take place within the 1 in 200 year floodplain, the extent of which shall be identified through a detailed flood risk assessment.

13. SEPA has commented that the indicative capacity of proposal SG1.15 in schedule 15 of the proposed plan has increased from 60 in the adopted local development plan to 126. The council has indicated that this figure reflects the developer's intentions. I note that an indicative capacity of 126 is also shown in the housing land audit 2019 and the site evaluation report.

14. No information has been submitted to justify a change to the capacity figure shown in the proposed plan. However, the flood risk assessment may have implications for the extent of developable land and, as a result, the site capacity. It is recommended that text is added to proposal SG1.15 in schedule 15 (housing sites) to explain that the outcome of the detailed flood risk assessment may have implications for the overall capacity of the site.

Schedule 16 – SG4.4 - Burnfield Road, Giffnock

15. This site lies to the south of the railway line in a predominantly residential area, with a care home located to the east and two small business/industrial premises to the south.

16. I note that the council agrees that there is a minor error in the mapping of the boundary of the site. I consider that the boundary should be adjusted to exclude the area of land which forms part of the garden ground at 5 Torburn Avenue. The correct boundary is shown on the revised site plan provided by the council.

17. Given the existing use of the site for car storage purposes, the nature of Burnfield Road and character of the surrounding area, the principle of redeveloping the site for housing is unlikely to raise any issues in terms of traffic, noise or pollution. Any impact on neighbouring properties in relation to the loss of privacy, daylight or sunlight could be suitably addressed at planning application stage.

18. I find no reason to remove housing proposal SG4.4 from the plan. Allocation of this site will help meet the all tenure housing land requirement as presented in Issue 14 (housing supply, phasing and delivery). With the exception of a minor adjustment to the site boundary, no modifications are recommended.

Reporter's recommendations:

Modify the proposed local development plan by:

1. Adjusting the boundary of proposal SG1.15 on the proposals map to align with the site shown as CS030 in the site evaluation report.

2. Adding the following sentences to the notes column of SG1.15 in schedule 15 (housing sites) on page 101:

“No built development should take place within the 1 in 200 year floodplain, the extent of which will be identified through a detailed flood risk assessment. This may have implications for the overall capacity of the site.”.

3. Adjusting the boundary of proposal SG4.4 on the proposals map to align with the revised site plan provided by the council.

Issue 18	Housing Supply Neilston	
Development plan reference:	Policy SG1: Housing Supply, Delivery and Phasing	Reporter: Alison Kirkwood
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>SportScotland (7/1) 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) (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 Lambje (282/1) Maureen Lambie (283/1) Ryan Stewart (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) Roslyn Taylor (309/1)</p>		

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)

<p>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 McInally (566/1) Margaret Kennedy (567/1) Scott Jordan (568/1) G Donnelly (569/1) Kaleb Queer (570/1)</p>	
<p>Provision of the development plan to which the issue relates:</p>	<p>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</p>
<p>Planning authority's summary of the representation(s):</p>	
<p><u>(a) Schedule 15 - Proposal SG1.16 - Crofthead Mill, Neilston</u></p> <p><u>Objections</u></p> <p><u>SEPA (492/3)</u></p> <ul style="list-style-type: none"> • Site fully within the 1:200 year flood plain. A surface water flood hazard exists. A culvert runs under the site. <p><u>(b) Schedule 15 - Proposal SG1.17 - Neilston Juniors, Neilston and Schedule 8 - D12.8 - Kingston Playing Field, Neilston</u></p> <p><u>Objections</u></p> <p><u>SportScotland (7/1)</u></p> <ul style="list-style-type: none"> • 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'.

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 Stewart (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

- Support for community sports hub for all the community to use.
- 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

Objections

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

Objections

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 Stewart (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 McInally (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

Objections

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/01). 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

Objections

SportScotland (7/1), 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) (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 Stewart (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 McLroy (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 Mccnicol (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 (BR1) (CD/25). 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

Objections

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 SG1.18. 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

Objections

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) 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.
- 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/20) (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/16) 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:

Schedule 15 - Proposal SG1.16 - Crofthead Mill, Neilston

1. A proposal for housing as part of a mixed use development at Crofthead Mill was included in the adopted East Renfrewshire Local Development Plan (2015). Further details, including support for housing as enabling development in conjunction with the refurbishment of the listed mill building, is provided in the council’s Neilston Infill Development Strategy Supplementary Guidance (2015).

2. The council has indicated that the reference to the need for a flood risk assessment for this site in the adopted local development plan was to address an objection from the Scottish Environment Protection Agency (SEPA).

3. SEPA has indicated that the Crofthead Mill site is fully within the 1 in 200 year floodplain. This is consistent with the extract from the SEPA river flooding map, provided by the council, which shows a significant proportion of the site as being at medium risk of flooding (1 in 200 years or 0.5% annual probability). The north east and south west corners of the site are shown as being at high risk of flooding (1 in 10 years or 10% annual probability).

4. Since the adoption of the existing local development plan, SEPA has published updated guidance on land use planning and flood risk, including its ‘Land Use Vulnerability Guidance’ (2018). This guidance, a copy of which was provided by SEPA, includes a classification of different uses of land and buildings, based on flood risk vulnerability.

5. The current uses at Crofthead Mill site are classed as “water compatible” (nature conservation and biodiversity site) and “least vulnerable” (industrial uses). Housing would result in the introduction of a “highly vulnerable” use. SEPA’s objection to housing development on the site is on the basis that its guidance does not support an increase in vulnerability to flood risk on land in areas of medium to high flood risk.

6. SEPA accepts that there are material considerations other than flood risk to take into account in considering the suitability of future uses on the site. It states that a flood risk assessment would provide a site specific understanding of the existing and future flood hazard, which could help inform any land use planning decision. But any re-development

would need to ensure a neutral effect on flooding, safe access/egress and appropriate and sustainable flood management measures, with an appropriate consideration of climate change.

7. The council considers that the risk of flooding can be mitigated through the requirement for a flood risk assessment. It states that the approach taken in the proposed plan aims to balance the flooding issues, the difficulties with restoration of a listed building with the potential for some enabling mixed use development to assist with unlocking the development potential of the site.

8. In response to a further information request, the site owner indicates that there have been no known recorded flooding incidents since the building was built in 1880. Land to the west of the site is in the same ownership and could be made available to help address any issues raised in the flood risk assessment.

9. Paragraph 263 of Scottish Planning Policy indicates that land of medium to high risk of flooding (greater than 1 in 200 years or 0.5% annual probability) may be suitable for residential development within built up areas, where flood protection measures exist or are planned. In this case, there are no flood protection measures on the site and I am not aware of any scheme in the pipeline. SEPA's position that no residential development should take place on the site is therefore consistent with Scottish Planning Policy.

10. It is my understanding that the SEPA flood maps are indicative and of a strategic nature, and are not intended to be used to identify the exact extent of land at risk of flooding. A detailed flood risk assessment would provide this information and could be used to inform the site layout and extent of the developable area. However, in this instance, the area shown on the SEPA flood map covers the majority of the site and therefore the potential for development to avoid the 1 in 200 flood-plain would appear to be limited. It is therefore far from certain that any residential development would be supported on the site.

11. I recognise the benefits that housing on the site could bring, as a potential alternative use of the listed building and to cross-subsidise restoration works. However, given SEPA's objection, it would be misleading for the local development plan to imply that the principle of housing on the site would be acceptable. I therefore recommend that housing proposal SG1.16 should be deleted from schedule 15 (housing sites) in the proposed plan. As the proposal is programmed in the period post 2031, its removal would have no implications for meeting the plan's housing land requirements.

12. This modification would however not rule out the possibility of housing forming part of the mix of uses on the site, if this can be justified through the submission of detailed supporting information. Crofthead Mill is located within the urban area where policy D2 (general urban areas) would apply. This policy would support residential development, subject to the considerations listed and compliance with other appropriate policies. Furthermore, strategic policy 1 (development strategy) in the proposed plan supports the re-use of brownfield and vacant sites.

13. Reference to housing proposal SG1.16 should be removed from the other proposals for Crofthead Mill in the proposed plan - D20.1 in schedule 14 (environmental protection proposals) and SG6.4 in schedule 18 (business proposals). However, in recognition of the benefits that housing could bring in terms of the restoration of the listed mill buildings, it is recommended that a reference to the potential for housing as part of mixed use

development (subject to a detailed flood risk assessment) is added to proposal D20.1 in schedule 14 and proposal SG6.4 in schedule 18.

Schedule 15 - Proposal SG1.17 - Neilston Juniors, Neilston and Schedule 8 - D12.8 - Kingston Playing Field, Neilston

14. The context for these two related proposals has changed since the publication of the proposed plan. The council has indicated that, as a result of Neilston Juniors football club signing a long term lease on its existing ground at Brig O'Lee, the site is likely to remain in recreational use until at least 2045. I agree with the council that, in these circumstances, it would not be appropriate to continue to identify the Neilston Juniors site as a housing proposal. The reporter's findings in relation to Issue 14 (housing supply, delivery and phasing) demonstrate that the removal of housing proposal SG1.17 from the proposed plan would have no implications for meeting the plan's housing land requirements.

15. The proposal to create a new community/sports hub at Kingston Playing Field was linked to the relocation of the football club. As the football club no longer wishes to relocate, there are now no plans to implement proposal D12.8. The removal of this proposal from the plan would have no implications for the policy designations which cover the site. It would still be identified as an area of urban greenspace and form part of the green network. Given the change in circumstances, I agree with the council that proposal D12.8 should be removed from the proposed plan.

16. A modification to the proposed plan to delete proposal SG1.17 from schedule 15 (housing sites) and D12.8 from schedule 8 (community facilities) and the proposals map is recommended.

Schedule 15 - Proposal SG1.18 - Holehouse Brae, Neilston

17. Robert Winning seeks further details on proposal SG1.18 at Holehouse Brae. Schedule 15 (housing sites) in the proposed plan provides indicative information on the proposed number of houses and development timescales. The other questions asked by Mr Winning relate to detailed matters which would be addressed through the planning application process. No modifications are proposed in response to this representation.

Schedule 15 - Proposal SG1.20 - North Kirkton Road, Neilston

18. The site at North Kirkton Road is identified as a housing proposal in the adopted local development plan. It was taken out of the green belt, along with two other greenfield sites in order to meet housing needs, across all tenures, over the plan period and beyond.

19. Objections to housing development on this site were considered through the examination for the adopted plan. That examination concluded that in principle, the release of green belt land for additional housing was justified and could benefit the implementation of the Neilston regeneration process. It was considered that any potential technical or environmental constraints could be addressed through a planning application.

20. The site now forms part of the established housing land supply and will contribute towards meeting the housing land requirement set out in Clydeplan 2017 (the strategic development plan for Glasgow and the Clyde Valley). The site no longer forms part of

the green belt and is not covered by a green space or any other environmental designations.

21. As the site lies within the urban area, its development would accord with the development plan strategy set out in strategic policy 1 (development strategy) in the proposed plan. The council has confirmed that the educational infrastructure needs associated with the development of the site are included in its calculations.

22. A planning application for housing development on the North Kirkton Road site was submitted in 2019. The council has indicated, in an update provided in April 2021, that the planning application has not been determined yet. It will be required to take account of matters raised in objections submitted to the application. This is a separate process from the preparation of the local development plan.

23. The principle of housing development on the site is already established through the adopted local development plan. None of the matters raised in representations would justify the deletion of the housing proposal from the proposed plan and therefore no modification is recommended.

Reporter's recommendations:

Modify the proposed local development plan by:

1. Deleting proposals SG1.16 (Crofthead Mill, Neilston) and SG1.17 (Neilston Juniors, Neilston) from schedule 15 (housing sites) on page 102 and the proposals map.

2. Deleting proposal D12.8 (Kingston Playing Field, Neilston) from schedule 8 (community facilities) on page 82 and the proposals map.

3. Amending the description column for proposal D20.1 in schedule 14 (environmental protection projects) on page 88 to read:

“Restoration of Crofthead Mill with potential for a mixed use development of employment and community use (proposal SG6.4). Housing may also be acceptable as part of a mixed use development, subject to the submission of a flood risk assessment and supporting information in relation to the restoration of the listed mill buildings.”.

4. Amending the description column for proposal SG6.4 in schedule 18 (business proposals) on page 109 to read:

“Restoration of Crofthead Mill with potential for a mixed use development of employment and community use (proposal D20.1). Housing may also be acceptable as part of a mixed use development, subject to the submission of a flood risk assessment and supporting information in relation to the restoration of the listed mill buildings.”.

Issue 18 – Housing Supply Neilston

(b) Schedule 15 - Proposal SG1.17 - Neilston Juniors, Neilston and Schedule 8 - D12.8 - Kingston Playing Field, Neilston

Appendix 1 – Common Objections

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 Stewart (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)

Marie Victoria Wood (59/1)

- Neilston Juniors are active on the site identified. Council does not have an ownership interest in the site. Neilston Juniors football club received funding to improve sporting facilities on the site. Situation in relation to use of the site should be clarified.

Karen Lappin (122/1)

- Disagree with removal of Neilston Juniors at Brig O'Lea stadium for housing. Club & location an important part of Neilston's history. If club relocated to Kingston Park it would have an adverse impact on the greenspace (D5) designation

Thomas Guild (132/1)

- Neilston has very little in the way of recreational areas and additional housing development would have an impact upon this. Neilston Juniors recently signed a lease until 2045 and are in talks to extend this to seventy years for the stadium and want to develop it and also Kingston Fields for the local community. The loss of recreational facilities is against Policy D13 for protecting sports facilities and football pitches. Also the village is already struggling to cope with the present population, there is not a good enough infrastructure as it is without adding more demand on it. There is a waiting list to join the Doctors

Robert Mould (137/1)

- Understand that that the council had offered a 75 year lease on this ground to the Neilston Juniors /Sports Hub.

Allan Paterson (203/1)

- Dependant on Neilston Juniors relocation which is not planned. Conflicts with Scottish Government targets for sport. No need for housing as over target by year (2029). More housing puts increased pressure on schools. Neilston Juniors wish to remain and develop the ground. Neilston Juniors secured long-term lease from Council (until 2045) & in discussion to extend to (70 yr.) lease. Housing development (SG1.17) would be contrary to Policy (D13).

Joyce Wallace (207/1)

- Current home of Neilston Juniors who have no wish to relocate to Kingston playing field. Neilston Juniors received extended lease from Council (until 2045) with possible extension to 2070, thus allowing club to apply for funding. No need for additional housing Kingston playing field has village history and is already well used (relocation) would impact on recent improvements (well-used skate park/new playpark & planting).

Ian Davidson (210/2)

- Object to relocation of Neilston Juniors to Kingston playing fields as they are already a well-used asset.

John Scott (247/1)

- Object to housing development on Brig O'Lea Stadium. The members of the Sports Hub, with encouragement from the Leisure Trust and others have long term plans regarding the development of the stadium so it can be used all year round for a range of activities. Having secured a 25 year extension to their lease, the Juniors have now spent in excess of £ 12k on basic improvements and are in the process of applying to a variety of funders to enable the installation of an all-weather pitch. The appearance of housing on this site in LDP2 has put these funds in jeopardy.

Gary Lambie (259/1)

- Severe lack of football and sports facilities in Neilston. Removing Brig O' Lea stadium would only make these matters far worse, with Neilston juniors representing the heart of the community sports hub in the local area.

Andrew Whiteford (261/1)

- Object to the building of 35 houses at Brig O'Lea Stadium in Neilston. This land was gifted to the community to be used for recreational purposes. Neilston Community Sports Hub have plans to improve the facilities at Brig O'Lea so that it can be used in a much better way by the community.

Steven Galbraith (271/1)

- Object to housing Site should be retained as a recreational space which has village history.

Mrs Susie Stewart (273/1)

- Object to housing on the longstanding historical home of Neilston Juniors (gifted by Crofthead Mill owners for recreational purposes). Brig O'Lea (Neilston Juniors) site is a valued and longstanding part of the fabric of the village.

Christopher Hearn (274/1)

- Object to housing on the longstanding historical home of Neilston Juniors Brig O'Lea (Neilston Juniors) site is a valued and longstanding part of the fabric of the village. Supportive of improvements to sport facilities not their removal.

Kevin Robertson (276/1)

- Object to housing of Brig O'Lea site. Facility is well used community facility (especially the 200 member Neilston Juniors Youth academy).

Lewis Pollock (277/1)

- Object to housing. There is a long history of the club at this site with lease until 2045. Neilston Juniors should continue at this location.

Stephen Fox (279/1)

- Object to housing Brig O'Lea (Neilston Juniors) are an important part of community contributing to all ages within the village.

James Lawn (281/1)

- Object to building houses at Brig O'Lea stadium.

Stephanie Lambje (282/1)

- Object to building on a well-used football park for which a lease has been secured for and which brings together the community.

Maureen Lambie (283/1)

- Park should be kept for sports, young village children are part of Neilston Juniors set-up.

Ryan (285/1)

- Draws attention to Neilston Juniors contract at site running until 2045. Believes this contact should be honoured, it represents the future of grassroots football at a historical site.

Martyn Robertson (287/1)

- Opposed to development at Neilston Juniors, Brig O'Lea stadium. Football club movement away from historic roots has not proven successful nationally. Believes movement away from the ground would kill the soul of the club.

Allan Gray (288/1)

- Oppose the proposed use of the land at Brig O'Lea home of Neilston Juniors Football Club for the use of building houses.

1st Neilston Boys Brigade (289/1)

- Brig O'Lea grounds should be kept as sports facilities for the wider community.

Debi Ward (290/1)

- This facility should be kept as a sports facility for the young people of the village.

Brian Tait (291/1)

- I would rather see the Neilston Junior's stadium stay where it is. The Kingston playing fields looks nicer as an open space.

Lynsey McLaren (292/1)

- No more houses, leave it as a community sports ground.

Louise McAdam (293/1)

- Brig O'Lea must stay as a community sports venue.

John O'Donnell (294/1)

- This should remain as a sports facility for the area.

Sonja Millar (295/1)

- Object to more houses in a green belt area. If Neilston juniors move to Kingston where do the younger football groups play on sat morning/afternoon.

Eunan McColgan (296/1)

- It is vital to the local community that this development does not go ahead. This site should remain as a sports facility for the community.

Natalie (297/1)

- This would not be the correct move for the club or fans.

Sean Taylor (298/1)

- Would like to see the sports ground stay. No new houses on this land.

Neil Wilson (299/1)

- This land should be kept as a sports ground for the local team, Neilston Juniors, and other youth groups to use.

Hannah (300/1)

- Lovely grounds for the football academy... let's not take away every part of Neilston.

Mrs Fiona Taylor (301/1)

- Keep Brig O'Lea as a sports ground.

Elaine Ross (302/1)

- Keep as a football ground and public facility.

Sarah Aird (303/1)

- Keep as a football ground and public facility.

Anne Forrest (304/1)

- Need the football ground more than houses.

Emma Murdoch (305/1)

- It is vital to our community to retain Brig O'Lea as a community sports ground. It would be harmful to the village if efforts to maintain a communal and active common area for residents to enjoy were ignored and proposals to develop this land go ahead.

Matt Drennan (306/1)

- Keep Neilston's Brig O'Lea as a sports hub and stadium - no houses on site.

Sam (307/1)

- Object.

Roslyn Taylor (309/1)

- Don't want to see more houses being built in Neilston. Need Brig O'Lea football ground for the future children and all sports which is very important in a small village & for a healthy lifestyle.

John Taylor (310/1)

- The football ground is part of the village's history and a vital part of the village. There is absolutely no need to utilise this for housing when there are already new houses being built elsewhere in the village.

Catrina Broadhurst (312/1)

- This facility should remain as a sports ground and the housing proposal scrapped.

George Boyce (313/1)

- Keep this as a playing field. The kids in Neilston need this.

David Todd (315/1)

- Objection to proposed council expansion of housing in Neilston Local Area Brig O'Lea Stadium.

Claire Whelan (316/1)

- Brig O'Lea be retained as a sporting facility especially for children who wish to remain active. Too many houses in Neilston already with adverse impact on roads & parking with increase in congestion.

Kim Allan (317/1)

- Against house building at Brig O'Lea stadium. This facility is used by children which complements Government thinking.

Andrew McIlroy (318/1)

- Keep Brig O'Lea as a football stadium.

Lorraine McLaughlin (319/1)

- Leave as sports venue.

Thomas Guild (320/1)

- Object to building houses on the Brig O'Lea stadium. House building would take away one of only two spaces in the village where sports can be played outside. This goes against Council policy.

Karyn Shields (321/1)

- Do not want houses built on football stadium as it's an important part of community particularly for children and sports development.

Karen Jardine (322/1)

- The football stadium belongs to the people of the village and should not be demolished.

Colin Whiteford (323/1)

- Taking a much needed lifeline away from youngsters. Would squeeze as many houses as possible into a small village which is already overcrowded.

John shields (324/1)

- No more houses for neilston. We must maintain the infrastructure for the residents we have.

Kirsty Hutchinson (325/1)

- This ground is a community stronghold and an invaluable resource to the children of Neilston.

Helen Fergus (326/1)

- Poor site choice for new housing - keep it as a sports facility for our local football teams.

Jill keys (328/1)

- Football ground should be kept as used for community and children's football.

Karen Guild, Select (329/1)

- Stadium stood for 70 years and is valuable part of village of Neilston. Move to Kingston Park would in turn mean less playing space for children of Neilston. Proposals would tear the heart out of beautiful village and make it soul-less. Appreciates peaceful quiet village with countryside on doorstep this housing proposal and others would deny these benefits. Objects to housing and cannot see need for more. Houses not needed especially at expense of the villages community

& history. Increased traffic especially heavy vehicles would be risk to pedestrians & cause disruption to villagers.

Jim Miller (330/1)

- Object to proposed plans for building on the site of Neilston juniors football ground. This ground has been part of village history for many decades and it should be given grants to develop not destroyed for houses.

Dawn Haddow (331/1)

- Land has been home to neilston juniors for years is good for the local community and land should not be developed into yet more houses.

Gareth Toner (332/1)

- Object to the proposal to build on Brig O'Lea Stadium, a vital centre of the village's community.

Nairn Manson (333/1)

- Object to more housing on greenspace. Neilston Juniors supporter for many years and see how well it is working for the youth community. Ground is being used to keep young people interested in sport and fit & healthy. Current lease on the site has not expired.

Karen McNaughton (334/1)

- Should be retained as sports ground Neilston becoming a town rather than village Neilston doesn't have many facilities. This sports facility helps bring the village together.

Jonathan Turner (335/1)

- Object to housing no need for more housing. Landmark to community that dates back decades. Retain local football team.

Amelia Henderson (339/1)

- Wishes site to remain as a sports stadium.

Amelia Henderson (340/1)

- Continue as a sports stadium with plans for housing removed.

Helen Boyce (342/1)

- Keep our sports ground for future generations. Object to more houses being built in Neilston.

Joanne Gardner (343/1)

- Object to unnecessary housing at the stadium (Brig O'lea) Stadium should be used to support football in local area.

William Bannister (344/1)

- Object to Brig O'Lea Stadium being used for housing development.

Euan walker (347/1)

- Brig O'Lea to remain as recreational ground for the benefit of the village.

Lesley Finnigan (348/1)

- Keep as a sports stadium, do not want more houses.

Suzanne Sinclair (349/1)

- Object to housing at the site. Supports sports at the Brig O'Lea site.

Linda King (350/1)

- Football stadium to remain and the ground not used for any future housing.

Alan Hay (351/1)

- Object to building of housing at Brig O'Lea stadium where Neilston Juniors currently play.

Joan Waygood (352/1)

- Object to any proposed housing development at the Brig O'Lea, Neilston. This land was gifted to the village for recreational, therefore should not be built on. The infrastructure of the village will struggle to support much more housing in the village.

Gordon Turnbull (353/1)

- Proposed development of houses at Brig O'Lea stadium be removed from the development plan.

Mrs Yvonne Parker (356/1)

- Object to houses being built on Brig O'Lea stadium, should remain as a sports facility for local youth.

Irene Turnbull (357/1)

- Football stadium should be retained. Brig O'Lea stadium provides an important sporting facilities resource, which is being developed further for people.

Jean McGarvie (358/1)

- Facility is a much needed resource in village more housing is not sustainable in the village. Neilston Juniors FC have over 200 young footballers and have a lease until 2045.

Heather Deane (359/1)

- Object to the proposed move of Brig O'Lea Stadium in Neilston to build more houses.

Angeline McSorley (361/1)

- Object to houses being built on the site of Brig O'Lea stadium should stay as a sports facility. This would be more beneficial to the community.

Gordon Kilburn (363/1)

- Keep Brig O'Lea as sports stadium.

Nicola Peacock (364/1)

- Against the current sports facility at Brig O'Lea being used to site a new housing development.

Maria Parker (365/1)

- Object to the plan for further housing. Community need a sports and leisure area.

Thomas Sanderson (366/1)

- Object to proposed plan to use home of Neilston Juniors (FC) for housing. Club represents part of Neilston's history contribution to Scottish football. This club provides long-term social and recreational benefits to young and old in the community. These benefits far outweigh the short-term gain (profit) from the sale of the land for private development.

Jacqueline Drennan (367/1)

- Keep this as a sports hub - no housing.

Jacqueline Tait (368/1)

- Neilston Juniors ground needs to be maintained without turning it into a residential area. Kingston Park is also well used.

Scott McMillan (369/1)

- Object.

David Scougall (370/1)

- Object to building on local sporting facilities/ football ground.

Kenneth Fulton (372/1)

- Object to the Brig O'Lea football ground (site SG1.17 on proposal map 2: Ivern valley) being developed into housing and think it should be kept as football grounds.

Lynn McNicol (373/1)

- Objecting to the relocation of Neilston Juniors.

Stephanie McInnes (374/1)

- Leave Brig o Lea as a sports facility and not more housing.

Maura Rome (378/1)

- Brig O'Lea Football Grounds should be retained as a Sports Stadium.

Anne MacLeod (379/1)

- Neilston is a small thriving town with large number of families with children. Neilston does not need more houses. It needs facilities for them for the future. It needs a hub for football and more.

William McLatchie (394/1)

- Strongly object to the proposal to build houses on the ground currently occupied by Neilston Juniors fc.

Margaret Pettigrew (396/1)

- No houses should be built at Brig O'Lea stadium, it should be kept as a sports venue for the community to use.

Alan (408/1)

- No household development on Brig O'Lea Stadium, Neilston.

Cecilia Garry (411/1)

- Object to housing, sports area should remain for community.

Robert R. Cameron (424/1)

- Loss of historic ground and long-term lease pressure on schools pressure on infrastructure.

Margaret Cameron (426/1)

- Loss of sports facilities historic club should stay remain in historic home pressure on schools.

Jim Sheriff (442/1)

- Pressure on school rolls Neilston juniors do not want to move loss of sports facilities.

Robert Dock (451/1)

- Object to development of Brig O'Lea Stadium for 35 houses. The Stadium is an integral part of the community and should remain as is.

Neilston Juniors (452/1)

- Loss of recreational facilities.
- Neilston Juniors hold lease.

Neilston Development Trust (454/1)

- Objection to designation for housing at Brig O'Lea plan to build 35 houses is in conflict with Scottish Government targets as there will be an excess of 1300 houses over target by 2029 (Table 2). Pressure on school rolls football club wish to remain at Brig O'Lea loss of sports facilities contrary to D13.

Stuart Hamilton (465/1)

- Objects to the planned proposal to build houses on the current site. The loss of the site to houses would be a detriment to the local community.

Issue 19	Housing Supply Newton Mearns	
Development plan reference:	Policy SG1: Housing Supply, Delivery and Phasing	Reporter: Malcolm Mahony
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Mrs Alison Gilchrist (113/1) Alexander Newall (121/2) 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) 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 & Mickel (458/1) Newton Mearns Flood Group (480/2) SEPA (492/2) Mrs Anne Lewis (502/1)</p>		
Provision of the development plan to which the issue relates:	<p>Schedule 15: Housing Sites SG1.23: Broom Park Drive, Newton Mearns SG1.30: Crookfur Cottage Homes, Newton Mearns Schedule 16: Affordable Housing and Housing for Particular Needs. SG4.5: Barrhead Road, Newton Mearns</p>	
Planning authority's summary of the representation(s):		
<p><u>(a) Schedule 15 - Proposal SG1.23 - Broompark Drive, Newton Mearns</u></p> <p><u>Objections</u></p> <p><u>Full list of representations set out in Appendix 1 with summarised key points set out below.</u></p>		

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), 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 (480/2)

- 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 (492/2)

- Proposal is fully within the 1:200 year flood plain.

(b) Schedule 15 - Proposal SG1.30 - Crookfur Cottage Homes, Newton Mearns

Objections

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 16 - Proposal SG4.5 - Barrhead Road, Newton Mearns

Objections

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 (121/2)

- Removal of site SG1.30 from Schedule 15 Housing Sites and on the associated proposals map.

(c) Schedule 16 - 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

Objections

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/01) 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/05). 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/28) 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/51) 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

Objections

Alexander Newall (121/2)

- The site has planning permission (2016/0794/TP) (CD/62) for 136 units and involves the demolition of 95 existing units with a net increase of 41. The application was granted by the Council’s planning committee August 2017 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 16 - Proposal SG4.5 - Barrhead Road, Newton Mearns

Objections

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 Fairweather park entrances.
- There is a significant pressure for affordable housing throughout the Council area. The current Strategic HNDA (CD/81) 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/45) 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/29).
- 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/46). 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:

Schedule 15 – Proposal SG1.23 – Broompark Drive, Newton Mearns

1. Site SG1.23 at Broom Park Drive/Windsor Avenue is a proposed housing site in a

residential suburb of Newton Mearns, whose capacity is given as 5 units. It comprises a 2.1 hectare grassed area with trees, the southern half of which was formerly a school playing field. The Broom Burn runs through the site.

2. The proposals map is confusing. It illustrates the northern half of the site shaded brown (housing) and the southern half shaded green (urban greenspace). But in its response to representations, the council explains that both designations are intended to apply to the whole site (along with a green network designation). The graphics require to be amended to clarify the council's intentions.

3. The entry under proposal SG1.23 requires a flood risk assessment to determine the developable extent of the site and to ensure that the proposal is consistent with flood risk framework within Scottish Planning Policy. The entry comments that the vast majority of the site is within the 1 in 200 year fluvial flood extent of the Broom Burn, and that development proposals should provide "an area of urban greenspace at least equal to that of the former playing field that forms the southern part of the site". The council considers that the playing field is likely to act as a natural flood alleviation/storage area.

4. In the adopted East Renfrewshire Local Development Plan (2015) the site is allocated for housing/urban greenspace/green network with a capacity of 8 residential units. The council states that the reduction in site capacity in the proposed plan reflects site constraints, the character of the surrounding area, where large detached houses predominate, and the site owner's proposed programming for the site as set out in the agreed Housing Land Audit 2019.

5. The land is in the ownership of the house-builders Mactaggart and Mickel, who are seeking an allocation for housing with the same area and capacity as in the adopted plan. They question the rationale for the changes in the proposed plan. They express concerns regarding the site area, but these have been resolved by the council's clarification (see paragraph 2 above). In their original representation, they state that they are close to submitting a planning application for 8 houses on the full site supported by technical work which demonstrates that flooding, drainage, greenspace and other policy requirements can be satisfied.

6. However, I have been informed more recently that Mactaggart and Mickel have submitted a planning application for 5 houses on the site, accompanied by a Flood Risk Assessment. As they point out, their application is under a separate procedure from my examination, and falls to be assessed against the current development plan. They argue that flood risk to this site was considered at the examination into the 2015 plan, but that it was not regarded as an insurmountable obstacle to development on at least part of the site. Whilst conceding that Scottish Planning Policy promotes the avoidance of development on functional flood plans and states that land raising should be accepted only in exceptional circumstances, they point out that it does not place an embargo on either of these activities. Rather, they can be allowed in exceptional circumstances. Mactaggart and Mickel argue that their planning application for a lower number than the indicative capacity of 8 units given in the adopted plan demonstrates that material considerations have been taken into account, and urge me to support the council's position that the site should be allocated for housing.

7. The Newton Mearns Flood Group provides information on a recent flood incident affecting the site and draws attention to the recently enhanced climate change allowance, arguing that the flood risk has now increased.

8. The Scottish Environment Protection Agency (SEPA) objects to the housing allocation of proposal SG1.23 as lying fully within the 1 in 200 year (0.5%) floodplain of the burn and requests its deletion. In fact, the SEPA River Flooding map shows nearly all of the northern part of the site and most of the southern part of the site with a 1 in 10 year (10%) annual chance of flooding rather than a 1 in 200 year (0.5%) chance.

9. I note that the allocation of this site for housing was considered and accepted at the 2010 local plan and 2015 local development plan examinations, despite SEPA's serious concerns at the latter (a claim of participation which has been challenged). SEPA has confirmed that its flood map has not changed substantively since 2015, although a subsequent climate change flood extent update has shown that the site will likely be subject to further flooding from that cause. Moreover, records of multiple local flood events, such as that referred to by the flood group, have provided verification of the flood map.

10. Whilst the climate change update is of concern, it has not been quantified and therefore I can place only limited weight on it.

11. In terms of any mitigation proposed by a flood risk assessment, SEPA accepts that an engineering solution for housing development on the site may be feasible, as is the case, they say, in the majority of instances where flooding is a major issue. However, they maintain that the most sustainable flood management approach is one of avoidance, in line with Scottish Planning Policy.

12. Scottish Planning Policy policies on development within flood plains have not changed since the 2014 edition, which was current when the council's existing allocation of the site was made. The local development plan policies on flooding in both the existing and the proposed plan adopt the risk framework contained in Scottish Planning Policy. That framework states that for medium and high risk areas residential development may be acceptable within built-up areas subject to appropriate flood protection measures and other provisos.

13. The council is satisfied that it can assess any future planning application against policies E6 (water environment); E7 (flooding); and E8 (water management) of the proposed plan together with the information on developable areas and appropriate mitigation provided by a flood risk assessment and consultation comments from SEPA.

14. The site has formed part of the established housing supply for many years. Site SG1.23 (5 units) is included in the Housing Land Audit for 31 March 2019 with programmed build dates of 2023/24/ and 2024/25. The same programming is shown in the council's recent Housing Background Report Update.

15. With regard to Mactaggart and Mickel's argument to retain the indicative site capacity at 8 units, I consider that the new information reported by SEPA in paragraph 9 above adds support to the council's proposal to reduce the indicative capacity of the site to 5 units.

16. With reference to other representations, development of part of the site would represent some loss of greenspace, albeit this has been accepted in previous housing allocations on the site indicating more dwellings. The presence of grey herons and other wildlife on the site would be protected by policies D4 (green networks and infrastructure) and D5 (protection of urban greenspace) of the proposed plan. There is no indication

that traffic impacts could not be addressed, and this would be a matter for detailed consideration at planning application stage. I consider, therefore, that these are not matters which would justify deletion of the allocation for housing.

17. The council's reassessment of the site since the current plan was adopted in 2015 has resulted in retaining its allocation for housing and a requirement for flood risk assessment, but reducing its indicative capacity. I find that this is a judgement which it is entitled to take in the context of the site history and within the terms of Scottish Planning Policy, and I have insufficient grounds to change it. I conclude that proposal SG1.23 should remain in the proposed plan with a capacity of 5 units.

Schedule 15 – Proposal SG1.30 – Crookfur Cottage Homes, Newton Mearns

18. Alexander Newall is concerned that the proposed conservation area at Crookfur Cottage Homes is a plan to destroy the homes. The estate comprises retirement housing run by a charitable trust, which includes a variety of supported living arrangements and some communal facilities. The original designs were commissioned from Sir Basil Spence. It comprises one of two conservation areas which the plan proposes to identify. The council intends to prepare an appraisal to guide future development in the area. These actions do not preclude changes to the area.

19. In this instance, the council has already granted permission for a number of additions and further buildings, the most recent of which, in 2017, involves demolition of 6 blocks of flats and the erection of additional accommodation. As the work has permission and is under construction, I have no capacity to recommend any amendment to this aspect of the proposed plan. Proposal SG1.30 should remain allocated.

Schedule 16 – Proposal SG4.5 – Barrhead Road, Newton Mearns

20. In relation to Sean Deakin's concerns, this site is currently allocated for affordable housing in the adopted local development plan. The council cites evidence in its Strategic Housing Needs and Demand Assessment and Local Housing Strategy of the continued significant pressure for affordable housing in the area. In the 2019 Housing Land Audit and the Action Programme, the site is programmed to deliver approximately 20 units in the period 2019 to 2024. It is included in the latest Strategic Housing Investment Plan and funding has been assigned for its development. There is therefore adequate justification for the proposed plan to carry that allocation forward.

21. The council has undertaken some initial transport assessments which demonstrate that the site can be safely accessed. It also proposes to create a new safe pedestrian crossing point on Barrhead Road together with improvements to the entrances at Fairweather Park. There is no indication that the site is unsuitable in principle and the council's suggestion that more detailed matters, including the effect on the character of the area and loss of informal greenspace, be dealt with in the development management process should a proposal come forward is reasonable.

22. The council has confirmed that it has title to the land and that it is not listed on the common ground register.

23. There is therefore no basis for me to recommend removal of the site from the plan.

24. Sean Deakin criticises the council's consultation arrangements for the local development plan. These are addressed in Issue 1 (general) and have also been the subject of a separate examination into conformity with the council's participation statement and found to be satisfactory. Our report on that examination will be available on the council's website.

Reporter's recommendations:

Modify the proposed local development plan by:

1. Amending the graphics on the proposals map to clarify that housing, urban greenspace and green network allocations apply to the whole of site SG1.23 – Broompark Drive, Newton Mearns.

Issue 19 – Housing Supply Newton Mearns

(a) Schedule 15 - Proposal SG1.23 - Broompark Drive, Newton Mearns

Appendix 1 – Common Objections

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)

Mrs Alison Gilchrist (113/1)

- Development would be vulnerable to flooding.
- Development would threaten greenspace and biodiversity.
- Development would increase traffic congestion on local roads.

Steve Brockie (134/1)

- SG1.23: Broom Park Drive is vulnerable to flooding and could increase flood risk.
- Development would impact on biodiversity and protected species: badger and grey heron.

Michael Maccorquodale (136/1)

- Development will increase flood risk to neighbours.
- 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.
- 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.
- There is a discrepancy in the LDP2 plan and the neighbour notification letter.
- New development would result loss of privacy to existing residents.

Mr and Mrs Brooks (140/1)

- Development will increase flood risk to neighbours.
- 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.
- 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.
- There is a discrepancy in the LDP2 plan and the neighbour notification letter.
- New development would result loss of privacy to existing residents.

Alan Gow (153/1)

- Development will increase flood risk to neighbours.
- 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.
- 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.
- There is a discrepancy in the LDP2 plan and the neighbour notification letter.
- New development would result loss of privacy to existing residents.

Douglas McCaig (164/1)

- Development will increase flood risk to neighbours.
- 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.
- 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.
- There is a discrepancy in the LDP2 plan and the neighbour notification letter.
- New development would result loss of privacy to existing residents.

Bhupinder Singh Lalli (165/1)

- Unacceptable flood risk.
- 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.

Fiona Watson (188/1)

- Development will increase flood risk to neighbours.
- 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.
- 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.
- There is a discrepancy in the LDP2 plan and the neighbour notification letter.
- New development would result loss of privacy to existing residents.

Melvyn Gaya (195/1)

- Development will increase flood risk to neighbours.
- 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.
- 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.

- There is a discrepancy in the LDP2 plan and the neighbour notification letter.
- New development would result loss of privacy to existing residents.

Steve Brockie (208/1)

- Building on floodplain
- Existing flooding/sewage overflow serious problems will be exacerbated
- Public health issues
- Wildlife also living in the vicinity (badgers & herons)

Andrew Beaumont (218/1)

- Loss of greenspace

Lindsey clothier (221/1)

- Discrepancy on housing site shown on the plan. 50% of this land needs to be kept green so why is it showing the meadow side on plan.
- Loss of greenspace.
- Lead to increased traffic problems.
- High flood risk within area.
- Loss of recreational area.
- Loss of protected wildlife.
- Disturbance during works.

Robert & Lynda Roddie (327/1)

- Adverse impact on standard of living, community and environment.
- Discrepancies on site area on proposals map/webpage.
- Impact on views and privacy would be lost.
- Impact on value of house & neighbouring house.
- Increased volume of traffic.
- Known flooding concerns, within floodplain, drainage problems will be exacerbated.

Peter Kewin (338/1)

- Designated flood area & site floods, further housing will exacerbate this and are there measures to mitigate this.
- Site has open space and is a natural habitat with wildlife interests (e.g. herons)
- Site used as recreational area for residents
- If developed all the assets of the site will be permanently lost which will affect value of surrounding houses
- Existing traffic problems will be increased substantially during works and thereafter.
- Site used as a walking route by children to (Belmont & Kirkhill) schools.
- Already poor road surface will deteriorate further.

Sylvia Black (341/1)

- Area has a history of flooding.

- More building on the site would increase the risk.
- The area is a natural habitat for birds and animals (some protected by law).
- Already is very busy traffic and more cars would cause pollution & danger to residents/children.
- Concerns about access arrangements from new development.
- Loss of greenspace and against climate change.

Lynne Swan (346/1)

- Discrepancies on site area on proposals map/webpage, needs clarification
- Area has always been high flood risk, due to adjacent burn & high water table.
- Further construction would make flooding more frequent & severe.
- Windsor Avenue is currently a quieter road with limited traffic, development would increase traffic & hazards for pedestrians.
- Currently provides greenspace/recreation area for residents with a variety of wildlife (e.g. Herons & bats)
- Would reduce privacy and have detrimental effect on house values

Nicola Docherty (415/1)

- There is a discrepancy in the area shown in the plan in Ldp2 which requires clarification
- Loss of privacy to neighbouring property
- Increase in traffic congestion
- Site is at risk from flood
- Loss of recreational open space
- Impact on protected species (Heron) and loss of biodiversity
- Disturbance during construction phase

Susan Robertson (421/1)

- Loss of greenspace.
- Impact on protected wildlife (heron).
- Cumulative impact of loss of green spaces (Whitecraigs bowling club closure nearby).
- Pressure on local facilities: schools.

Sheraz Ramzan (447/1)

- Development will increase flood risk to neighbours.
- 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.
- 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.
- There is a discrepancy in the LDP2 plan and the neighbour notification letter.
- New development would result loss of privacy to existing residents.

Mrs Anne Lewis (502/1)

- Flood risk - increase in flood risk to neighbouring properties.

- Loss of biodiversity: protected species inhabit the site.
- Adequate exiting housing supply.
- Loss of green space.

Issue 20	Submitted Housing Supply Barrhead	
Development plan reference:	Policy SG1: Housing Supply, Delivery and Phasing Schedule 15: Housing Sites	Reporter: Alison Kirkwood
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>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)</p>		
Provision of the development plan to which the issue relates:	<p>Chapter 4: Promoting Sustainable and Inclusive Economic Growth Alternative Housing Development Proposals:</p> <ul style="list-style-type: none"> • LDP2-01 Glasgow Road Salterland Road, Barrhead (CS003) • LDP2-10 Springhill Road West, Barrhead (CS044) • LDP2-24 Fereneze, Barrhead (CS026) • LDP2-25 Blackbyres Farm, Barrhead (CS040) <p>Supporting documents:</p> <ul style="list-style-type: none"> • Site Evaluation • Strategic Environmental Assessment 	
Planning authority's summary of the representation(s):		
<p><u>Objections</u></p> <p><u>(a) LDP2-01 Glasgow Road Salterland Road, Barrhead (CS003)</u></p> <p><u>L Mackay & Saurin (135/1)</u></p> <ul style="list-style-type: none"> • 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. <p><u>(b) LDP2-10 Springhill Road West, Barrhead (CS044)</u></p> <p><u>Miller Homes (463/1) (463/5) (463/8)</u></p> <ul style="list-style-type: none"> • Objects to the non-allocation of land at Springhill Road West Barrhead (CS044) for residential development 280 homes including 25% affordable. • 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. • 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. • 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 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 Lavern 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 Lavern 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 Lavern 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 Lovern 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/68) and Clydeplan (2017) (CD/80) 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, as further explained under Tables 9 and 10 of the Education Background Report (BR4) (CD/28).

Site Evaluation and Strategic Environmental Assessment

- Representations for sites (b) and (d) objected to the scoring and findings of the Site Evaluation (CD/34) and Strategic Environmental Assessment (CD/33) with site (c) objecting to the Site Evaluation scoring only.
- 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.

Objections

(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 Green Belt Landscape Character Assessment (CD/42a) (CD/42b) 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 Green Belt 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/41). 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. 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/05) 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 Green Belt 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 3rd May 2018 (2017/0784/TP) (CD/63). 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:

Housing Context

1. As expressed in Issue 14 (housing supply, delivery and phasing) the proposed plan provides sufficient housing to meet the housing land requirement without the need for further housing allocations. There is therefore no numerical justification to allocate further sites for private housing.

Site Evaluation and Strategic Environmental Assessment

2. This examination is concerned with unresolved issues to the proposed plan. The site evaluation and strategic environmental assessment scoring of sites are separate but informative to plan preparation. Consequently, revision of scoring is not within the remit of this examination. Furthermore, as there is no requirement for additional housing land to be identified in this local development plan, the scoring of one potential site relative to another is not a relevant consideration. Where parties have raised issues which apply directly to a site, then I have responded to those matters below.

LDP2-01 Glasgow Road Salterland Road, Barrhead (CS003)

3. The triangular shaped brownfield site promoted for housing at Glasgow Road is physically separated from the main built-up area of Barrhead by the railway line which runs along its southern boundary.

4. The site lies within landscape character area IRV2 (The Hurllet) in the 'East Renfrewshire Green Belt Landscape Character Assessment Update' (2016), which has an overall green belt sensitivity of moderate to strong. I agree with the council that the railway line to the south of the site establishes a strong defensible green belt boundary. Development on this site would have an adverse impact on the green belt as it would result in an extension of the urban area into the green belt corridor which separates Barrhead and Nitshill.

5. I note that the implementation of proposals D8.3 (strategic cycle corridor) and D8.4 (Levern walkway) in the proposed plan would improve pedestrian and cycle links between the site and neighbouring urban areas. However, the main access to the site is from Salterland Road which is narrow with no footways, raising road safety concerns. Due to its location, character and access arrangements, housing development on this site would not integrate well with the main built up area of Barrhead.

6. The current condition and appearance of the site do not make a positive contribution to the green belt, in terms of landscape setting or providing countryside access opportunities. However, this in itself would not justify residential development on the site, particularly when there is no strategic need for additional housing land to be identified. Policy D3 (Green Belt and Countryside around Towns) identifies a range of other uses which are supported in principle in the green belt and may provide an opportunity to bring this derelict site back into beneficial use.

7. In these circumstances, I do not consider the site to be suitable for housing purposes and I find no reason to remove it from the green belt. No modification to the plan is recommended.

LDP2-10 Springhill Road West, Barrhead (CS044)

8. The promoted site at Springhill Road lies to the west of the Barrhead South master plan area, a strategic greenfield expansion of the town identified in the adopted local development plan and carried forward into the proposed plan. The agreed 2019 housing land audit indicates that there is considerable remaining capacity in the allocated housing sites that form part of the Barrhead South master plan area.

9. The 'East Renfrewshire Green Belt Landscape Character Assessment Update'

identifies the site within landscape character area ULF7 (Newhouse/Springhill). This area of undulating lowland farmland has an overall green belt sensitivity of moderate to strong. Development on the site would have an adverse impact on the green belt as it would detract from the landscape setting of Barrhead when approaching from the west and would encroach into the green belt corridor between Barrhead and Neilston.

10. The development framework submitted by Miller Homes demonstrates that the site could form an extension to the Barrhead South master plan area, with good connections to the existing built up area and strategic planting to create a new inner green belt boundary. However, the site currently makes a positive contribution to the green belt and there is no strategic need for additional housing sites to be released through this plan. Consequently, I find that the site should not be recommended for inclusion in the proposed plan.

LDP2-24 Fereneze, Barrhead (CS026)

11. I note the planning history of the promoted site, in relation to its inclusion as a local plan housing proposal in 2010 and its deletion from the adopted local development plan in 2015. I have reviewed the relevant extracts from the previous examination reports in relation to this site.

12. Gladman Developments have indicated that the site was removed from the adopted local development plan due to landownership issues, which no longer apply. However, my understanding of the examination report is that the site was considered to make a valuable contribution to the setting and character of Barrhead, a conclusion which I continue to find reasonable.

13. The 'East Renfrewshire Green Belt Landscape Character Assessment Update' identifies the site within landscape character area NSF4 (Fereneze Slopes). This area of northern scarp farmland has an overall green belt sensitivity of moderate to strong. On my site inspection, I observed dog walkers on the site which suggests it provides opportunities for informal recreational access.

14. The site is physically contained by existing residential development to the east and the wooded Fereneze slopes to the north, south and west. The main adverse impact of development would arise as a result of the site's high visual sensitivity. The gradient of the site rises from its boundary with existing rear gardens and given its open character, the further encroachment of development onto the Fereneze slopes would be visible from the wider area.

15. Gladman Development's illustrative master plan layout shows that the site could be developed to continue the existing street pattern from Brownside Avenue, avoid intrusion onto the local biodiversity site, and provide additional planting and paths on the upper slopes to the west of the site. Despite these benefits, the site currently makes a positive contribution to the landscape setting of Barrhead.

16. Given that there is no requirement for additional housing land, there is no reason to remove the site from the green belt. Therefore, no modification to the plan is recommended to include the promoted site.

LDP2-25 Blackbyres Farm, Barrhead (CS040)

17. Avant Homes consider that the promoted site at Blackbyres Farms would be an effective housing proposal for 700 homes, if there is a requirement to allocate additional housing land.

18. The 'East Renfrewshire Green Belt Landscape Character Assessment Update' identifies the site within landscape character area LF1 (West Hurllet). It states that this area is of comparatively high landscape character and quality, is highly visible to people travelling along road corridors in the area and forms a key link in the network of undeveloped land separating settlements in the area. Given the open character and undulating topography of the land to the north east of Blackbraes Road, I consider that the site would be sensitive to development, even with the proposed boundary planting. Housing at this location would encroach into the area of green belt which separates Barrhead from Paisley to the northwest and Nitshill to the north east.

19. The addition of 700 homes would be a strategic allocation representing nearly 15% of the extrapolated housing land requirement to 2031 of 4,802 homes (as presented in Issue 14 – housing supply, delivery and phasing). While the promoter of the site has provided supporting environmental information, release of housing at the scale proposed would be substantial and has not been subject to public consultation or engagement with key agencies. In addition, as I have already indicated, there is no need for further land to be released from the green belt for housing development. The site makes a positive contribution to the landscape setting of Barrhead from the north east and there is no justification for removing it from the green belt. Therefore, no modification to the plan is recommended.

Reporter's recommendations:

No modifications.

Issue 21	Submitted Housing Supply Busby	
Development plan reference:	Policy SG1: Housing Supply, Delivery and Phasing Schedule 15: Housing Sites	Reporter: Gordon S Reid
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Mactaggert & Mickel (459/1) Eddie Casey (466/1) CALA Homes (West) and Lynch Homes (467/1) Romano Family (494/1) Taylor Wimpey (497/1)</p>		
Provision of the development plan to which the issue relates:	<p>Chapter 4: Promoting Sustainable and Inclusive Economic Growth Alternative Housing Development Proposals:</p> <ul style="list-style-type: none"> • LDP2-06 Hill Crescent, Busby (CS031) • LDP2-12 Westerton Lane, Busby (CS050) • LDP2-13 Easter Busby (CS051) • LDP2-21 Kittoch House, Carmunnock Road, Busby (SMIR01) • LDP2-22 Easterton Avenue (MIR7/CS063) <p>Supporting documents:</p> <ul style="list-style-type: none"> • Site Evaluation 	
Planning authority's summary of the representation(s):		
<p><u>Objections</u></p> <p><u>(a) LDP2-06 Hill Crescent, Busby (CS031)</u></p> <p><u>Mactaggert & Mickel (459/1)</u></p> <ul style="list-style-type: none"> • 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). • By way of relevant precedent Mac&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. <p><u>(b) LDP2-12 Westerton Lane, Busby (CS050)</u></p> <p><u>Eddie Casey (466/1)</u></p> <ul style="list-style-type: none"> • 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 Planning Statement 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 Planning Statement 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.
- The allocation of this strategic site will meet the aims of SPP and planning legislation by providing land for the sustainable development of new housing. This site is well connected and provides an appropriate location for settlement expansion which will be well integrated into the local community.

(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 Planning Document in support of their proposal. State that all issues including 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)

Mactaggert & 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/68) and Clydeplan (2017) (CD/80) 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, as further explained under Tables 9 and 10 of the Education Background Report (BR4) (CD/28).

Site Evaluation

- Representations for site (e) objected to the scoring and findings of the Site Evaluation (CD/34).
- 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.

Objections

(a) LDP2-06 Hill Crescent, Busby (CS031)

Mactaggert & 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/20) (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 Green Belt Landscape Character Assessment (CD/42a) (CD/42b) 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 Green Belt 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 Green Belt 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 (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 Green Belt 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:

Site Evaluation

1. This examination is concerned with unresolved issues to the proposed plan. The site evaluation and strategic environmental assessment scoring of sites are separate but informative to plan preparation. Consequently, revision of scoring is not within the remit of this examination. However, where parties have raised issues, which apply directly to a site, then I have responded to those matters below.

LDP2-06 Hill Crescent, Busby

2. The promoted housing site is located within the settlement of Busby and comprises an area of steeply sloping land of approximately 0.43 hectares to the north of Hill Crescent and to the south of Busby Road. The site is shown in the proposed plan as an undeveloped area which, as noted on my site inspection, is covered in a dense mixture of trees and shrubs. There is a footpath running along the southern boundary with the only pedestrian access to the site from a flight of steps from Hill Crescent.

3. Although the development potential of the site appears to be constrained, due to the steep slope and limited access, the council confirmed that it granted planning permission (council reference 2020/0440/TP) subject to conditions for three houses within the site on the 21 January 2021.

4. Mactaggert and Mickel refer to an example of a small site allocated in the proposed plan at Whitecraigs Bowling Club (proposal SG1.33) for six houses and contend that as their site is similar it should be included in the proposed plan. I note that the site at Whitecraigs had the benefit of planning permission when the proposed plan was being prepared and was included as an allocated site on the basis that it was already contributing to the housing land supply.

5. As it has been established in Issue 14 (housing supply, delivery and phasing) that there

is no requirement for further housing land allocations to meet the housing land requirement I am satisfied that it is not necessary to allocate the Hill Crescent site within the proposed plan. I find that the planning permission issued on the site for three houses would contribute to the housing land supply as a windfall site. In addition, I consider that the non-allocation of the site within the proposed plan would not prejudice the future development of the site in accordance with the planning permission granted by the council.

LDP2-12 Westerton Lane, Busby

6. The promoted housing site is a single field of approximately 1.37 hectares currently used for grazing horses and is located within the existing green belt on the southern edge of the settlement of Busby. The site is well contained on three sides with Westerton Lane to the north-east, a railway line and equestrian centre to the south-east and a wide belt of mature trees to the north-west. The boundary to the south-west is less defined with some hedgerows and individual trees. This boundary could be reinforced with additional landscaping to create a more defined and defensible edge. In addition, the land at this point rises steeply to the south-west, which would potentially limit further development in this direction. I established at my site inspection that given its location and appearance the site contributes positively to the setting of the existing settlement.

7. The council's 'Green Belt Landscape Character Assessment Update' (2016) identifies the site as being within Landscape Character Area ULF2 (Busbyside) which is an area described as moderate green belt sensitivity, medium visual sensitivity and a low landscape sensitivity. The site also forms part of the identified green network (protected through policy D4). Given the relatively small size of the site and its well-contained location, I consider that its loss would not significantly undermine the overall integrity of the green belt around the urban edge of Busby or result in any coalescence with adjoining settlements. In addition, I am satisfied that it would not compromise the objectives of proposal D8.9 to provide a core path and local access to Busby Station and Williamwood High School.

8. A planning statement (including an indicative layout and transport statement) has been submitted to demonstrate that the site could be developed for up to 20 homes (including affordable housing) and that a satisfactory access solution could be achieved. The proposed access would be from Westerton Lane, which I note narrows significantly when approaching the site and would likely need to be widened requiring land outwith the site. There are reasonably good links into existing active travel networks with public transport facilities including bus and rail services within a short walking distance. The council contend that the site may not be deliverable, as no active house builder has been identified as having an interest in the site.

9. I note that the site was identified by the council as a preferred housing site under Option 2A of the main issues report. However, the council did not progress the site as an allocation within the proposed plan as it opted to pursue a strategy of consolidation and regeneration without any further housing land release.

10. Notwithstanding that the site may have the potential to be developed for housing, it has been established in Issue 14 (housing supply, delivery and phasing) that there is no requirement for further housing land allocations to be released to meet the housing land requirement over the period of the proposed plan. Accordingly, I find that as the site makes a positive contribution to the visual and landscape setting of the existing settlement there is no justification for its removal from the designated green belt.

LDP2-13 Easter Busby

11. The promoted housing site of approximately 17 hectares is located on the eastern side of the settlement of Busby, within the designated green belt and would accommodate up to 200 homes, including provision for affordable housing and the later living market. The site is open countryside and extends from East Kilbride Road in the south to Carmunnock Road in the north. The western edge adjoins the rear boundaries of the residential properties of the existing settlement, which also forms the eastern boundary of the Busby Conservation Village conservation area.

12. The council's 'Green Belt Landscape Character Assessment Update' identifies the site as being within Landscape Character Area IRV1 (Busby) which is described as having moderate to strong green belt sensitivity, low visual sensitivity and medium to high landscape sensitivity. The site also forms part of the identified green network (policy D4) and there is a local biodiversity site (D7.3) immediately to the east. I observed during my inspection that the site is highly visible from the surrounding area and particularly when approaching Busby from the east along East Kilbride Road (A727) and from Carmunnock Road. I note the council's concerns that the allocation of this site would result in the loss of a significant area of both the green belt and the green network in a highly visible location. It would also bring the settlement edge up to the boundary of the local biodiversity site and the council's administrative boundary. I consider that if this site were to be fully developed for housing, it could potentially undermine the integrity of the green belt at this highly visible location.

13. Cala Homes (west) and Lynch Homes are jointly seeking to develop the site. As part of their submission a planning statement has been submitted which is based on a range of technical assessments undertaken to provide an analysis of the site's opportunities and constraints and includes a Landscape and Visual Assessment, a Transport and Access Appraisal, a Phase 1 Habitat Survey and a Civil Engineering Review. From this a design solution and phasing programme has been provided to demonstrate that housing could be accommodated within the landscape without having any adverse effect on the visual setting, existing habitat, the local biodiversity site, and the conservation area. Access to the site is to be taken from newly formed junctions onto East Kilbride Road and Carmunnock Road and it is contended that the site is within a convenient distance of existing facilities and services in Busby with good links to the existing public transport facilities.

14. While I acknowledge that the site could accommodate some level of development for housing, I agree with the council's concerns regarding the scale of the development, the loss of the designated green belt and potential adverse visual impact. In addition, it has been established in Issue 14 (housing supply, delivery and phasing) that there is no requirement for further housing land allocations to be released to meet the housing land requirement over the period of the proposed plan. Accordingly, I find that as the site makes a positive contribution to the visual and landscape setting of the settlement of Busby there is no justification for its removal from the designated green belt.

LDP2-21 Kittoch House, Carmunnock Road, Busby

15. The promoted housing site is located on the eastern side of the settlement of Busby and extends to some 17 hectares of undulating open countryside within the designated green belt. The council's 'Green Belt Landscape Character Assessment Update' identifies the site as being within Landscape Character Area IRV1 (Busby) which is described as having moderate to strong green belt sensitivity, low visual sensitivity and medium to high

landscape sensitivity. Part of the site is also within the identified green network (D4) and I note that the northern part contains a site of special scientific interest (D7.1) and a local biodiversity site (D7.3).

16. I note that the site would be separated from the existing settlement boundary to the west by agricultural land, which is also part of the designated green belt. Only a small section of the site would be adjacent to the existing settlement edge along Carmunnock Road. Accordingly, I do not consider that the site would integrate particularly well with the urban form of the existing settlement. Given the size of the site, its allocation would remove a significant area of land from the designated green belt. In addition, it would also leave an isolated wedge of green belt, which I agree with the council could come under pressure for further development in the future. Overall, I consider that the allocation of the site for housing would result in the fragmentation of the green belt at this location.

17. Whilst it is claimed in the submitted evidence that the site is within a single ownership, free from constraints and, therefore, effective I note that there is no active developer associated with the site. In addition, no indicative site layout has been provided or potential mitigation measures to demonstrate that the designated sites (site of special scientific interest and local biodiversity site) would be protected from any potential adverse effects from the development of housing.

18. I observed at my site inspection that only a narrow section of the site would have a boundary onto the existing public road network. The submitted technical note relating to accessibility sets out design options to support the use of a single point of access to serve the site. However, I note that there are still matters of principle to be resolved as to the suitability of forming a new access onto Carmunnock Road at this location and the scale of development that could be accommodated from a single point of access.

19. Overall, given its relatively isolated location I do not find that the site would form a logical extension to the urban edge of the settlement of Busby. In addition, I consider that it would also undermine the integrity of the wider green belt and the green network. Therefore, I do not consider that there is sufficient evidence to demonstrate that the site is suitable for residential development. Furthermore, it has been established in Issue 14 (housing supply, delivery and phasing) that there is no requirement for further housing land allocations to be released to meet the housing land requirement over the period of the proposed plan. Accordingly, I find that as the site makes a positive contribution to the visual and landscape setting of the settlement of Busby there is no justification for its removal from the designated green belt.

LDP2-22 Easterton Avenue, Busby

20. The promoted housing site is located on the southern edge of the settlement boundary of Busby and extends to some 12.9 hectares of undulating farmland within the designated green belt (policy D3). There are residential properties to the north with a railway line to the west, East Kilbride Road (A727) to the east and farmland and the settlement of Thorntonhall to the south. The council's 'Green Belt Landscape Character Assessment Update' identifies the site as being within Landscape Character Area ULF2 (Busbyside) which is an area described as moderate green belt sensitivity, medium visual sensitivity and a low landscape sensitivity. Given the topography of the site, the main visual impact would be from the west, which includes the railway line with only a limited visual impact from East Kilbride Road. Given the size of the site, I consider that it would result in a significant loss of designated green belt and the identified green network (policy D4). It would also lessen the distance

between Busby and Thorntonhall (to between 250 to 300 metres) potentially reducing the distance between the two settlements.

21. Taylor Wimpey has submitted supporting documentation seeking to address the issues of accessibility, loss of green belt, visual impact, ecology, flood risk, design, and sustainability. It is also highlighted that the site includes the allocated site for affordable housing (SG 4.2 Easterton Avenue) which Taylor Wimpey intend to deliver along with the affordable housing requirement for the wider development. I note from the supporting material that the development of the site would seek to form a new defensible boundary between the site and Thorntonhall with sensitive landscaping to address any concerns regarding coalescence. It is also proposed to include large areas of public greenspace along the new boundary that would add to the wider green network. Access is to be taken from East Kilbride Road and Station Road, which would provide convenient connections to existing to bus and rail services. Whilst, the council raises concerns regarding the loss of green belt and potential coalescence of Busby with Thorntonhall it recognises that these concerns could be potentially addressed through an appropriately designed layout and the use of landscaping and green open space to form a new defensible southern boundary.

22. I note that the site was identified by the council as a preferred housing site under Option 2A of the main issues report to assist with the delivery of the allocated site SG4.2. The council advises that the site was not progressed as an allocation within the proposed plan as it opted to pursue a strategy of consolidation and regeneration without any further housing land release.

23. Although the site may have the potential to be developed for housing, it has been established in Issue 14 (housing supply, delivery and phasing) that there is no requirement for further housing land allocations to be released to meet the housing land requirement over the period of the proposed plan. Accordingly, I find that the site makes a positive contribution to the visual and landscape setting of the settlement of Busby. There is no justification for its removal from the designated green belt.

Reporter’s recommendations:

No modifications.

Issue 22	Submitted Housing Supply Clarkston	
Development plan reference:	Policy SG1: Housing Supply, Delivery and Phasing Schedule 15: Housing Sites	Reporter: Alison Kirkwood
Body or person(s) submitting a representation raising the issue (including reference number):		
Mactaggert & Mickel (460/1) (490/1)		
Provision of the development plan to which the issue relates:	<p>Chapter 4: Promoting Sustainable and Inclusive Economic Growth Alternative Housing Development Proposals:</p> <ul style="list-style-type: none"> • LDP2-07 Land at Williamwood Golf Club, Clarkston • LDP2-20 Newford Farm, Clarkston (MIR03/CS023) <p>Supporting documents:</p> <ul style="list-style-type: none"> • Site Evaluation 	
Planning authority's summary of the representation(s):		
<p><u>Objections</u></p> <p><u>(a) LDP2-07 Land at Williamwood Golf Club, Clarkston</u></p> <p><u>Mactaggert & Mickel (460/1)</u></p> <ul style="list-style-type: none"> • The site has been subject of a planning application (ref. 2019/0442/TP) for the 'Erection of 14 flats. • 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. • 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. • 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. • By way of relevant precedent Mac & 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. <p><u>(b) LDP2-20 Newford Farm, Clarkston (MIR03/CS023)</u></p> <p><u>Mactaggert & Mickel Homes (490/1)</u></p>		

- Objects to the non-allocation of land at Newford Farm, Clarkston (CS023) 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 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, Clarkston
Mactaggert & 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)
Mactaggert & 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/68) and Clydeplan (2017) (CD/80) 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, as further explained under Tables 9 and 10 of the Education Background Report (BR4) (CD/28).

Site Evaluation

- Representations for site (b) objected to the scoring and findings of the Site Evaluation (CD/34).
- 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.

Objections

(a) LDP2-07 Land at Williamwood Golf Club, Clarkston

Mactaggert & 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)

Mactaggert & 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/20) (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 Green Belt Landscape Character Assessment (CD/42a) (CD/42b) 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:

Housing Context

1. At the main issues report stage of the proposed East Renfrewshire Local Development Plan 2, the council sought views on two options in relation to the plan's development strategy. The preferred option (2A) identified eight housing sites to be removed from the green belt within the context of a "controlled edge of settlement growth" strategy. The alternative option (2B) was not to promote any new development outwith the current urban areas and focus only on consolidation and regeneration.
2. To avoid major impacts upon existing education infrastructure, the development plan strategy of the proposed plan is in effect based on option 2B (consolidation and regeneration). None of the green belt housing sites, identified at the main issues report stage, are included in the proposed plan.
3. As expressed in Issue 14 (housing supply, delivery and phasing) the proposed plan provides sufficient housing to meet the housing land requirement without the need for further housing allocations. There is therefore no numerical justification to allocate further sites for private housing.

Site Evaluation

4. This examination is concerned with unresolved issues to the proposed plan. The site evaluation scoring of sites is separate but informative to plan preparation. Consequently, revision of scoring is not within the remit of this examination. Furthermore, as there is no requirement for additional housing land to be identified in the proposed plan, the scoring of one potential site relative to another is not a relevant consideration. Where parties have raised issues which apply directly to a site, then I have responded to those matters below.

LDP2-07 Land at Williamwood Golf Club, Clarkston

5. The promoted site is located on the west side of Clarkston Road, immediately to the south of a row of two storey dwellinghouses. It is covered in rough grass, with some bushes and trees and a metal fence along its eastern edge. The site lies within the boundary of Williamwood Golf Club, but does not form part of the course itself.

6. I note that an appeal, following the council's refusal of planning permission for 14 flats on the site, was dismissed in June 2020 on the grounds of scale, massing and streetscape impacts.

7. The site is identified in the proposed plan as urban greenspace and part of the green network. These designations are appropriate, given the character and appearance of the site and its position on the edge of the golf course. However, as the site is not used for recreational purposes and it lies next to and opposite existing housing, I consider that it may also be suitable for residential development. Indeed, I note that past decisions refusing planning permission have not dismissed the principle of development on the site and that Mactaggart and Mickel are in discussions with the council regarding an alternative form of residential development on the site. I also note that development of the site could potentially provide beneficial funding to improve the golf club.

8. However, as I have indicated above, there is no requirement to identify further housing sites in this local development plan. However, subject to the criteria in policies D4 (green networks and infrastructure) and D5 (protection of urban greenspace) in the proposed plan, and other relevant considerations, housing could come forward as a windfall proposal.

9. While there is no justification to identify the site as a housing proposal in the local development plan, its potential for residential development could be addressed through the planning application process. No modification to the plan is proposed.

LDP2-20 Newford Farm, Clarkston (MIR3/CS023)

10. The promoted site at Newford Farm was one of the eight green belt housing sites identified under Option 2A at the main issues report stage. As I have indicated above, the reason the site was not included in the proposed plan related to impact on education infrastructure and a change in the plan's overall development strategy.

11. The response submitted by Mactaggart and Mickel to the main issues report in February 2017 includes an illustrative masterplan. This was drawn to demonstrate how matters raised by the council in relation to green infrastructure, boundary landscaping and the creation of a defensible green belt boundary, could be addressed.

12. The detailed site analysis identifies two main developable areas, one immediately adjacent to Eaglesham Road and the other to the east, on lower ground next to the White Cart Water. I note the potential to maintain and enhance existing trees and hedgerows to create a strong, defensible green belt boundary, address flooding issues and provide improved road and pedestrian connections to Newford Grove.

13. The site's score of 18 in the site evaluation report and its identification as a preferred site in the main issues report indicate that the council considers this site to be suitable for housing. From the information available to me, I have no reason to disagree with this assessment.

14. However, the site is currently in the green belt and in agricultural use. The ‘East Renfrewshire Green Belt Landscape Character Assessment Update’ (2016) identifies the site within landscape character area ULF1 (Millerston), with an overall green belt sensitivity of moderate to strong. The site contributes to green belt objectives in providing an landscape setting for Clarkston from the south and maintaining separation between Clarkston and Waterfoot.

15. As stated above, the proposed plan provides sufficient housing to meet the housing land requirement without the need for further housing allocations. Therefore, there is no justification for removing the site from the green belt at this time.

Reporter’s recommendations:

No modifications.

Issue 23	Submitted Housing Supply Eaglesham	
Development plan reference:	Policy SG1: Housing Supply, Delivery and Phasing Schedule 15: Housing Sites	Reporter: Alasdair Edwards
Body or person(s) submitting a representation raising the issue (including reference number):		
Cala Homes (West) (464/1) (464/2) (464/8) Stewart Milne Homes (488/1)		
Provision of the development plan to which the issue relates:	<p>Chapter 4: Promoting Sustainable and Inclusive Economic Growth Alternative Housing Development Proposals:</p> <ul style="list-style-type: none"> • LDP2-11 Humbie Road, Eaglesham (CS061) • LDP2-18 Waukers Farm, Eaglesham (MIR02/CS016) <p>Supporting Documents:</p> <ul style="list-style-type: none"> • Site Evaluation • Strategic Environmental Assessment 	
Planning authority's summary of the representation(s):		
<p><u>Objections</u></p> <p><u>(a) LDP2-11 Humbie Road, Eaglesham (CS061)</u></p> <p><u>Cala Homes (West) (464/1) (464/2) (464/8)</u></p> <ul style="list-style-type: none"> • Objects to the non-allocation of land at Humbie Road, Eaglesham (CS061) for residential development of 100 homes including 25% affordable. • 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. • Representee submitted a development framework and housing land supply statement in support of their proposal. • 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. • 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). • The updated SEA Assessment also demonstrates that the proposal will have an overall positive impact on the environment. <p><u>(b) LDP2-18 Waukers Farm, Eaglesham (MIR02/CS016)</u></p> <p><u>Stewart Milne Homes (488/1)</u></p>		

- Objects to the non-allocation of land at Waulkers Farm, Eaglesham (CS016) for residential development.
- 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 Homes (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/68) and Clydeplan (2017) (CD/80) 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, as further explained under Tables 9 and 10 of the Education Background Report (BR4) (CD/28).

Site Evaluation and Strategic Environmental Assessment

- Representations for sites (a) and (b) objected to the scoring and findings of the Site Evaluation (CD/34) and Strategic Environmental Assessment (CD/33).
- 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.

Objections

(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 Green Belt Landscape Character Assessment (CD/42a) (CD/42b) 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' and also falls out with the settlement boundary within the Green Belt.

- 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 Homes (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/20) (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 Green Belt 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 off 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' and also falls out with the settlement boundary within

the Green Belt.

- 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:

Housing Context

1. As expressed in Issue 14 (housing supply, delivery and phasing) the proposed plan provides sufficient housing to meet the housing land requirement, and provides a sufficient range and choice, without the need for further housing allocations. There is therefore no numerical justification to allocate further sites for private housing.

Site Evaluation and Strategic Environmental Assessment

2. This examination is concerned with unresolved issues to the proposed plan. The site evaluation and strategic environmental assessment scoring of sites are separate but informative to plan preparation. Consequently, revision of scoring is not within the remit of this examination. Furthermore, as there is no requirement for additional housing land to be identified in this local development plan, the scoring of one potential site relative to another is not a relevant consideration. Where parties have raised issues which apply directly to a site, then I have responded to those matters below.

Humbie Road

3. The examination into the East Renfrewshire Local Plan in 2010 rejected the inclusion of land to the west of Humbie Road for 100% affordable housing. The steep slope increasing visibility of development; the well-established existing green belt boundary; and contribution of the site to an open and attractive setting on the approach to the north of Eaglesham led the reporter to conclude that the site should not be allocated.

4. Similarly, in the examination into the now adopted East Renfrewshire Local Development Plan (2015) the site at Humbie Road was promoted for 86 homes by Cala Homes but rejected by the reporter. The reporter concluding that development of the site would represent a "major incursion into a very visible section of the green belt and would undermine the open and rural setting of Eaglesham".

5. The grassed pasture site is now promoted for the allocation of 100 homes (including 25% affordable). I agree (as do the council) that over time a robust green belt boundary could be created with the implementation of a tree belt and structured planting, and that this could benefit biodiversity. I also note that the site may be effective with clear house-builder interest. However, there has been no change in circumstances which justify the site now being allocated for housing. There is no housing need to allocate the site. The

site continues to provide a defensible green belt boundary to the settlement providing an open and rural setting on the approach to Eaglesham from the north. I find that the site should be retained as green belt and not allocated for housing.

Waukers Farm

6. Land at Waukers Farm was previously sought for 24 homes through the now adopted East Renfrewshire Local Development Plan (2015). At that time the reporter accepted that an allocation in this location “would appear as a reasonable and logical squaring-off of the village, continuing eastwards the settlement boundary that already exists on the west side of Eaglesham Road”. However, the reporter rejected allocation as there was a sufficient housing land supply.

7. The site now sought for allocation is currently pasture grassland bound by Strathaven Road to the west, existing housing to the north and further fields to the east and south. There is a woodland strip to the far north of the site by The Old Kirkhouse and a pedestrian walkway adjacent to the south of the site (Eglinton Walk). The site slopes gently down from Strathaven Road easterly with a slight rise from the east at Eglinton Road before dipping.

8. The greenbelt designation covering the promoted site is judged overall in the council’s assessments to be of weak to moderate sensitivity but, as indicated by the council (and noted on my inspections), it provides an open and rural setting to the settlement. The submitted indicative layout demonstrates that the site could be integrated with adjoining housing with likely adequate provision for landscaping and open space. A mature tree belt is shown on the southern and eastern boundaries to provide a new defensible green belt boundary which (once mature) would provide a more robust boundary than the current open aspect. The site is accessible to bus services and local facilities. The site is also deemed to be effective with developer interest. However, there are education capacity issues which could impede development of land in this location. While I accept that there are some benefits to allocation of the site there is no need, at present, for additional housing land. Consequently, I find that the site should be retained as green belt and not be allocated for housing.

Reporter’s recommendations:

No modifications.

<p>Issue 24</p>	<p>Submitted Housing Supply Newton Mearns</p>	
<p>Development plan reference:</p>	<p>Policy SG1: Housing Supply, Delivery and Phasing Schedule 15: Housing Sites</p>	<p>Reporter: Malcolm Mahony [Alasdair Edwards]</p>
<p>Body or person(s) submitting a representation raising the issue (including reference number):</p>		
<p>Taylor Wimpey (172/1) (172/2) Persimmon Homes (382/1) (384/1) Mactaggert & 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 (487/1) Church of Scotland General Trustees (499/1) (499/3) Robertson Homes (506/1) (506/2) (506/3)</p>		
<p>Provision of the development plan to which the issue relates:</p>	<p>Chapter 4: Promoting Sustainable and Inclusive Economic Growth Alternative Housing Development Proposals:</p> <ul style="list-style-type: none"> • LDP2-02 Humbie Road/Mearns Road, Newton Mearns (CS025) • LDP2-03 Burnhouse Farm Parcel 2, Newton Mearns (CS065) • LDP2-04 Burnhouse Farm Parcel 1, Newton Mearns (CS064) • LDP2-05 Broomburn Drive, Newton Mearns (CS029/ MIR04) • LDP2-09 Barcapel, Newton Mearns (CS013) • LDP2-14 Land at Humbie Road, Newton Mearns (SMIR06) • LDP2-15 Ryatt, Newton Mearns (CS035) • LDP2-16 Pilmuir Quarry, Newton Mearns (CS045) • LDP2-17 Barrance Farm Newton Mearns (CS007& CS008/MIR01) • LDP2-23 Mearns Kirk Glebe, Newton Mearns (SMIR03) • LDP2-27 Humbie Road, Newton Mearns (CS046) • LDP2-29 Whitecraigs Golf Course, Newton Mearns (CS017 + new areas) <p>Supporting Documents:</p> <ul style="list-style-type: none"> • Site Evaluation • Strategic Environmental Assessment 	
<p>Planning authority's summary of the representation(s):</p>		
<p><u>Objections</u></p> <p><u>(a) LDP2-02 Humbie Road/Mearns Road, Newton Mearns (CS025)</u></p> <p><u>Taylor Wimpey (172/1) (172/2)</u></p> <ul style="list-style-type: none"> • Objects to the non-allocation of land at Humbie Road/Mearns Road, Newton Mearns (CS025) for residential development for 250 homes including 25% affordable. 		

- The site is also considered to be meet the tests of effectiveness set out in PAN 2/2010.
- Incumbent on the Plan to provide a range and choice of housing sites to meet housing needs.
- Representee submitted a Masterplan as detailed in an earlier 'Call for Sites' submission 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 2, Newton Mearns (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) LDP2-04 Burnhouse Farm Parcel 1, Newton Mearns (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.
- A proposed layout plan was submitted in support of the proposal.

(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, Newton Mearns (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, Newton Mearns (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.
- Newspaper Articles, Vacant & Derelict Land Correspondence, Screening Request and Screening Opinion, Remediation Costings and Indicative Concept were submitted

to support the proposal.

(i) LDP2-17 Barrance Farm, Newton Mearns (CS007 & CS008/MIR1)

Stewart Milne Homes (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.

(i) LDP2-23 Mearns Kirk Glebe, Newton Mearns (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 Egelsham 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, Newton Mearns (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 Nethererton 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 Humbie 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 2, Newton Mearns (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) LDP2-04 Burnhouse Farm Parcel 1, Newton Mearns (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, Newton Mearns (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, Newton Mearns (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 (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, Newton Mearns (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 Humble 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 Cours, Newton Mearns (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/68) and Clydeplan (2017) (CD/80) 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, as further explained under Tables 9 and 10 of the Education Background Report (BR4) (CD/28).

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/34) and Strategic Environmental Assessment (CD/33).
- 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.

Objections

(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 Green Belt Landscape Character Assessment (CD/42a) (CD/42b) 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 biodiversity. 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/62) for 85 houses was refused by the Councils planning committee December 2012.
- 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 2, Newton Mearns (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 Green Belt 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) (CD/06). 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) LDP2-04 Burnhouse Farm Parcel 1, Newton Mearns (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 Green Belt 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/20) (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/01) 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 Green Belt 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) within this Schedule 4 response 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, Newton Mearns (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 Green Belt 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 Green Belt 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/41) 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 Country Park SPG (CD/13). 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, Newton Mearns (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 Green Belt 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 (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 (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 Green Belt 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, Newton Mearns (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 as outlined under Issue 10. 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 Humbie 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 Humbie 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 Green Belt 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 Humble 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, Newton Mearns (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:

(a) LDP2-02 Humbie Road/ Mearns Road, Newton Mearns (CS025)

1. Taylor Wimpey seeks the allocation of site LDP2-02 Humbie Road/Mearns Road on the southern edge of Newton Mearns for a residential development of 250 homes, including 25% affordable, to be built over the plan period. It is a greenfield site in agricultural use and lies within the green belt. It is partly situated within the green network. A masterplan and a transport appraisal have been submitted to demonstrate how the development could be integrated into the locality. A planning application in 2012 for development of 85 houses on part of this site was supported by council planning officers but refused by the planning committee.
2. It is not contested that the site has good access to local services and facilities or that the site is effective or deliverable. The identified areas at risk of flooding are on the margins of the site and could be avoided by built development, as could the local biodiversity site in the same area.
3. However, the site has an unspoilt rural character, is widely visible to the south, and contributes both to the landscape setting of this part of the green belt and as a southern approach to Newton Mearns. I am satisfied that the existing green belt boundary in this location is robust.
4. Allocation of the site would involve releasing land from the green belt, which is not necessary as the examination has concluded in Issue 14 (housing supply, delivery and phasing) that the proposed plan would provide sufficient housing to meet the housing land requirement without the need for further housing allocations. Consequently, there is no justification for removing this site from the green belt or for adding it to Schedule 15: Housing Sites.

(b) LDP2-03 Burnhouse Farm Parcel 2, Newton Mearns (CS065)

5. Persimmon Homes seeks the inclusion in the proposed plan of a greenfield site at Burnhouse Farm on the southern fringe of Newton Mearns, lying within the green belt. The site is bounded by Waterfoot Road to the north, Burnhouse Farm to the west, a farm access track/core path to the east and a hedgerow to the south.
6. The company builds smaller, more affordable homes many of which are eligible for help-to-buy assistance. Over 25% (41) affordable homes could be provided whose benefits would include allowing existing owner-occupiers to downsize.
7. The site has good access to primary and secondary schools as well as to local services such as a new co-operative convenience store. I note that the council does not challenge the effectiveness or deliverability of the site.
8. The site has a pleasant rural character and provides a positive contribution to the landscape setting of this part of the green belt. Its visual impact on the wider landscape is

reduced by its location within a topographical bowl. However, it forms part of the wider green network protected under proposed local development plan policy D4.

9. Two primary schools have recently been constructed to the south of Waterfoot Road to meet an education need in relation to the ongoing Maidenhill residential development. I do not regard this as necessarily setting a precedent for housing development to the south of the road.

10. Allocation of the site would involve releasing land from the green belt, which is not necessary as the examination has concluded in Issue 14 that the proposed plan would provide sufficient housing to meet the housing land requirement without the need for further housing allocations. Consequently, there is no justification for removing this site from the green belt or for adding it to Schedule 15: Housing Sites.

(c) LDP2-04 Burnhouse Farm Parcel 1, Newton Mearns (CS064)

11. Persimmon Homes also seeks the allocation of a smaller site at Burnhouse Farm which is bounded by Waterfoot Road, Burnhouse Farm, a burn to the east and Mearns Cemetery.

12. The same considerations would apply as for site LDP2-03, other than that the landscape impacts would be reduced, but so also would be the size of the housing allocation and the number of affordable homes.

13. Allocation of the site would involve releasing land from the green belt, which is not necessary as the examination has concluded in Issue 14 that the proposed plan would provide sufficient housing to meet the housing land requirement without the need for further housing allocations. Consequently, there is no justification for removing this site from the green belt or for adding it to Schedule 15: Housing Sites.

(d) LDP2-05 Broomburn Drive, Newton Mearns (CS029 / MIR04)

14. Mactaggart and Mickel is seeking the allocation of a site at Broomburn Drive for housing. The site is currently in use as a car park serving the adjacent shops and neighbourhood centre, an open grassed amenity area and a children's play area. It forms the northern end of a corridor of amenity open space, which follows the Broom Burn and takes in Broomburn Park, through to Mearns Castle High School.

15. In the adopted East Renfrewshire Local Development Plan (2015), the northern part of the site is allocated as a neighbourhood centre and identified for development of a health centre/nursery school. However, there is no longer any interest in a health centre at this location. The council's Main Issues Report 2016 afforded the site preferred status for housing development. But the council explains that because of its concerns about the impact of new development on education infrastructure and the volume of objections lodged against allocation of the site at the Main Issues stage, the proposal was not carried forward to the proposed plan.

16. Mactaggart and Mickel state their intention to deliver 60 houses, being a mix of 50% private and 50% affordable, alongside new retail/commercial and community facilities. Their indicative layout incorporates replacement parking, retail and community units. These are features which were advocated in the council's commentary on this site in the Main Issues Report. The loss of green space would be mitigated by improving the

quality of provision, including improving the existing playspace or relocating it nearby.

17. In the proposed plan, the northern portion of the site is designated as a neighbourhood centre, and the balance as urban greenspace. The unbuilt areas form part of the wider green network. Tree preservation order and local biodiversity site designations apply and a core path runs through the site. The open space and children's play area are well maintained and, I noted at my lunchtime site inspection that the route through the park was well used by students from the high school heading towards Broom neighbourhood centre. In response to consultation on the Main Issues Report, Scottish Natural Heritage commented that the site provides a gateway to the park and play facilities, as well as contributing to the wider landscape setting and that it has clear value and function to the local community.

18. The provision of an enhanced proportion of affordable housing would clearly be desirable, particularly as there is a predicted deficit in the provision of affordable housing to meet the social sector housing land requirement beyond 2024 (as identified in Issue 14). However, on the other hand, the site plays a valuable recreational and amenity role, which would be reduced by the proposed development. Furthermore, as the examination has concluded in Issue 14 that the proposed plan would provide sufficient housing to meet the all tenure housing land requirement without the need for further housing allocations, there is no requirement for additional private housing.

19. Overall, I consider that there is insufficient justification for adding this site to Schedule 15: Housing Sites.

(e) LDP2-09 Barcapel, Newton Mearns (CS013)

20. Mactaggart and Mickel is seeking the allocation of a site for housing at Barcapel in the north-west of Newton Mearns and to the east of a recently completed residential development by Persimmon Homes. It lies between the Neilston to Glasgow railway line and Whitecraigs Golf Course, and is linked to wider proposals for reconfiguration of the course, which are further addressed in section (l) below. The land comprises agricultural fields and development is proposed for around 37 housing units on the northern part of the site only. The balance of the land would be used for an extension to the golf course.

21. Issues such as flood risk, drainage, and road access do not appear to present insoluble problems. And use of the southern part of the site as an extension to the golf course would be an acceptable use within the green belt and therefore not, in principle, contentious. As an enabling development for improvements to the golf course and facilities, the housing would help secure the club's longer term future would benefit sports provision in the locality. However, development of housing as sought would represent an incursion into the green belt and would adversely impact the wider green network. Moreover, limited information has been submitted on accessibility to public transport, services and facilities for residents in this location.

22. As the examination has concluded in Issue 14 that the proposed plan would provide sufficient housing to meet the housing land requirement without the need for further housing allocations, I consider that there is insufficient justification for removing this site from the green belt or for adding it to Schedule 15: Housing Sites.

(f) LDP2-14 Land at Humbie Road, Newton Mearns (SMRI06)

23. William Clifford is seeking the allocation of a 4.8 hectare site off Humbie Road for housing. It is in agricultural use and lies in open countryside roughly one kilometre south-east of Newton Mearns. It is being promoted for low density, large family homes, with an indicative capacity of 50 units.

24. The site is entirely detached from the main urban area of Newton Mearns. It has poor accessibility to services and facilities and to public transport. Currently, the land makes a positive contribution to this part of the green belt and forms a green gateway to Newton Mearns. It also forms part of the wider green network. Development in this location would represent a significant incursion into the green belt. I also note that the effectiveness and deliverability of the site has not been demonstrated.

25. For the above reasons and because the examination has concluded in Issue 14 that the proposed plan would provide sufficient housing to meet the housing land requirement without the need for further housing allocations, I consider that there is no justification for removing this site from the green belt or for adding it to Schedule 15: Housing Sites.

(g) LDP2-15 Ryatt, Newton Mearns (CS035)

26. Homeground Limited seeks the removal of land at Ryatt from the green belt and its inclusion in the plan for housing and/or mixed use development. The site would have a notional capacity of 250-300 dwellings. The land comprises open countryside in agricultural use to the west of the M77 motorway. The council's site location plan shows two parcels of land between Aurs Road and the Neilston to Glasgow railway line. However, the western parcel, which is mostly bounded by reservoirs, is not indicated for development in the report submitted by Homeground.

27. Homeground states that this is a brownfield site in that the landscape is man-made, the land is made ground as a result of historic waterworks and quarrying activity, and it is economically unviable for agriculture. The council maintains that it is a greenfield site. I have insufficient information to draw any conclusion on that dispute, but I do not regard it as determinative in this case.

28. Homeground maintains that allocation of the site would assist in the provision of a link from Barrhead to junction 4 of the M77, thereby reinforcing the aims of policy M2: M77 Strategic Development Opportunity by improving access to the Dams to Darnley Country Park and the regeneration and promotion of Barrhead as a strategic business and industrial location. However, the council explains that, at the local plan examination in 2010, Transport Scotland stated that they would only support improvements at Junction 4 if they related to development of national significance. As the proposed uses do not qualify as being of national significance, no junction improvements could be expected.

29. In the 2011 local plan, the land was allocated for industrial use in the form of a single user high amenity Inward Investment Site. The representation contends that this establishes the principle of development on this land. However, that allocation was for a very specific type of development to meet the strategic needs of that time. Now that the strategy has changed, that argument no longer holds.

30. The site lies within the Dams to Darnley Country Park, whose strategic objectives are to enhance the recreational, environmental and tourism value of the park. I consider that

the proposal would undermine those objectives.

31. The site is outside, and not well related to, the built form of Newton Mearns. The existing green belt boundary follows the line of the M77 providing a strong and very well defined urban edge. However, development in this area would represent a large and prominent incursion into the green belt and would erode the green wedge separating Newton Mearns from Barrhead and Darnley. Release of the area would be likely to increase development pressure on the wider green belt.

32. Homeground argues that lack of infrastructure, especially unresolved drainage problems have prevented housing sites in the adopted plan from being brought forward for development and therefore the site at Ryatt should be allocated as not having such problems. However, our examination has concluded that sufficient effective sites have been identified in the latest housing land audit, in which issues of infrastructure, including drainage, have been assessed.

33. In relation to other arguments raised by parties: no evidence of effectiveness and deliverability has been submitted; the site is not easily accessible to a primary school; other aspects of accessibility have not been demonstrated; in order to meet its plan strategy, the council has the discretion to release green belt land, which it has done at Lyoncross (SG1.5), but as this has not been the subject of an unresolved representation I have no locus to comment; the consent for a retirement village at Netherplace is for a specialised type of development rather than for mainstream housing; and it is not the function of our examination to adjust the council's site evaluation scoring, but I have addressed the relevant matters arising from the evaluation in my conclusions.

34. In addition to the above points, the examination has concluded in Issue 14 that the proposed plan would provide sufficient housing to meet the housing land requirement without the need for further housing allocations.

35. For all the above reasons, I consider that there is no justification for removing this site from the green belt, for adding it to Schedule 15: Housing Sites or for including it in the plan for mixed use development.

(h) LDP2-16 Pilmuir Quarry, Newton Mearns (CS045)

36. Highloch Limited seeks the inclusion in the proposed plan of some 17 hectares of land at Pilmuir Quarry for housing. The representation proposes enabling residential-led, mixed use development, including leisure uses, to cross-fund security, maintenance and environmental improvements to the site. Indicative plans show some 30-55 residential properties, leisure uses and amenity space.

37. This former quarry site, largely ringed by tree belts and other vegetation, is located in the green belt to the west of the M77. The representation describes how wastes and refuse tipped here have received no contamination capping and only superficial rehabilitation, resulting in a safety hazard to people and wildlife. Lack of natural supervision and the presence of precipices, deep water, etc. have resulted in anti-social behaviour and accidents. It should be recognised as a brownfield redevelopment opportunity which would remediate the site. It is argued that this proposal would remove pressure for landfill or other bad neighbour uses.

38. The site is not included in the council's vacant and derelict land assessment because

of its green belt location. As no information has been provided on accessibility to public transport, services and facilities, the sustainability of housing in this location has not been demonstrated. Neither have the effectiveness and deliverability of housing development on the site been demonstrated. The representation does not contemplate leisure or other mixed uses without enabling residential development, so those other uses cannot be considered in isolation.

39. The site lies outside, and is not well related to, the urban form of Newton Mearns. The proposal could extend the area of visible built development further west. The M77 forms a strong boundary for the existing green belt, and this boundary would be breached. The land also forms part of the wider green network protected under policy D4.

40. In addition to the above points, the examination has concluded in Issue 14 that the proposed plan would provide sufficient housing to meet the housing land requirement without the need for further housing allocations.

41. For all the above reasons, I consider that there is no clear justification for removing this site from the green belt, for adding it to Schedule 15: Housing Sites or for including it in the plan for mixed use development.

(i) LDP2-17 Barrance Farm, Newton Mearns (CS007 and CS008/MIR1)

42. Stewart Milne Homes seeks the allocation of two parcels of land at Barrance Farm for residential development. Together they comprise 17 hectares of agricultural land on the south-eastern edge of Newton Mearns and within the green belt. An indicative layout for the whole site has been prepared showing around 260 units.

43. The southern, triangular, parcel was identified as a preferred site in the Main Issues Report, but not carried through to the proposed plan because of the potential impact of major housing releases on the education infrastructure.

44. The northern parcel forms part of the green corridor between Newton Mearns and Clarkston. Development on this land would, to some extent, reduce the gap.

45. Both parcels have a rural appearance and contribute to the landscape setting of this part of the green belt. If released, they would extend the area of visible built development to the south and east and encroach into the wider green network.

46. As the examination has concluded in Issue 14 that the proposed plan would provide sufficient housing to meet the housing land requirement without the need for further housing allocations, I consider that there is no justification for removing this site from the green belt, or for adding this site, or either parcel, to Schedule 15: Housing Sites.

(j) LDP2-23 Mearns Kirk Glebe, Newton Mearns (SMIR03) [Alasdair Edwards]

47. Due to a potential conflict of interest, the unresolved issues related to Mearns Kirk Glebe have been assessed by a different reporter.

48. Land to the north-east and east of Mearns Kirk (B-listed) is promoted for housing and improved parking. This area currently accommodates an area of open space (the glebe); the kirk car park; and a 1960s manse and garden. The adopted East Renfrewshire Local Development Plan (2015) designates the open space as “protected urban greenspace” with

the manse and car park located within the urban area. This situation remains the same in the proposed plan with the greenspace protected under proposed policy D5 (protection of urban greenspace).

49. The promoters (the Church of Scotland Trustees) have provided an indicative layout which includes eight houses to the north-east of the site and the repositioning of the access from Eaglesham Road to serve the housing and an improved car park. In general terms, redevelopment of the existing car park within the urban area for an improved car park would be acceptable in principle and the provision of landscaping (as shown on the site layout) would be beneficial in softening the approach to Mearns Kirk (located to the west). The manse and garden are also located within the urban area where policy D2 (general urban areas) would support the principle of redevelopment for housing subject to design and amenity considerations and taking account of the proximity to the B-listed kirk. As an area of white land within the settlement boundary no change to the proposed plan is necessary in relation to these aspects.

50. The greenspace within the promoted site is part of a wider area of designated greenspace to the north, west and south of Mearns Kirk. The greenspace which would be lost contributes to open unimpeded views to and from the kirk. While I note that the greenspace is private (as a kirk glebe) there are no physical barriers to entry and, as identified by the promoters, it is used for recreational purposes associated with the kirk. In my view, the greenspace provides an area of amenity and relief from the traffic on Eaglesham Road (which is set down on lower ground to the north). Despite the promoters suggesting there is no value, I also consider that this area of greenspace provides some amenity value within the settlement and could have some, albeit limited, biodiversity value related to flora and habitat (particularly as there is no supporting tree survey). I appreciate that this area of urban greenspace would represent a marginal proportion of the overall greenspace protected. However, I find that on the basis of the information presented it has value and contributes to the wider protected area.

51. Mature pine trees are also located on the edge of the manse garden which are shown to be removed in the indicative layout. While the promoters argue that these are non-native and impede views to the kirk from Eaglesham Road they are, as confirmed by the council in further written submissions, covered by a tree preservation order. There is no tree survey or other sufficient evidence submitted to the examination which would allow me to conclude that the loss of trees would be acceptable.

52. I sought further written submissions from parties relating to the setting of the kirk. Historic Environment Scotland indicates that the kirk was historically set within a rural context and describes the current situation with the kirk being at a modest distance from modern housing meaning that it is mostly surrounded by open and semi-open greenspace which reflects the historic open setting. It concludes that “the relatively open setting of the church forms a contrast with the surrounding housing estates and is a respectful reminder of its historic context, allowing it to remain a modest landmark in the immediate area and to be understood as a historically rural church”.

53. The promoters note that the kirk occupies an elevated position surrounded by open greenspace but that buildings and the previously alignment of Eaglesham Road (to the east of the kirk) were in close proximity; and that, currently, there are modern houses at Newton Place and Newton Grove (west of the kirk) at a similar distance to that promoted by the Trustees. It is also argued that the creation of a new access from Eaglesham Road and removal of trees could be beneficial to the setting of the kirk. While the council agrees that

the kirk is set in open space on raised ground it refutes that a new cut embankment to provide access from Eaglesham Road would benefit the setting. Additionally, the council note a previous appeal decision refusing two houses at Newton Place to the west of the kirk from 2016 where, I note, the reporter refers to the dominating position of the kirk; the importance of views to and from the kirk; and that open space provides a strong and attractive setting for the listed building.

54. Reflecting on the above, and from my site inspection, I consider that the kirk sits in a relatively commanding position over its surroundings. The open and green space surrounding the kirk provides relief from the surrounding housing and activity on Eaglesham Road and allows it to continue to be recognised as a historically rural kirk. While there were buildings in closer proximity to the kirk in the past those have been demolished and a review of the historical mapping shows that land to the north and north-east of the kirk has remained open since the Roy map of 1755. Houses on Newton Place and Newton Grove are a similar distance to that promoted but there are intervening trees to those properties and these are located to the rear of the kirk rather than the more prominent northern gable where steps lead down to the urban greenspace. The 1960s manse, garden and trees block views to the kirk from Eaglesham Road and redevelopment could provide an opportunity to open up views to the kirk. However, the indicative plan provided shows a dense formation of housing suggesting that views, particularly open views, would not be readily available. The promoted new access from Eaglesham Road could also provide an opportunity for a new vista to the kirk. However, this would likely require the formation of a cutting (due to level changes) and the introduction of the road, footways and associated infrastructure would be at odds with the open outlook from the kirk at present. On the basis of the information submitted, I find that the introduction of housing promoted by the Trustees would likely affect the setting of the listed building.

55. The density of housing promoted is higher than that of the surrounding area with the indicative layout showing much smaller homes and gardens than those in the surrounding streets. That may be suitable in relation to the efficient use of land but also suggests potential overdevelopment. In addition, moving the access would involve cutting into an embankment to form a junction onto Eaglesham Road next to an existing bus shelter. There is insufficient detail on the matters of access and road safety for me to form a view as to whether moving the access road would be beneficial.

56. Release of the land for housing would contribute to the housing land supply and provision of affordable housing. However, as detailed in my conclusions in Issue 14 (housing supply, delivery and phasing) the proposed plan provides sufficient housing to meet the housing land requirement, and provides a sufficient range and choice, without the need for further housing allocations. In addition, while the promoters question the site evaluation and strategic environmental assessment scoring, this examination is only concerned with unresolved issues to the proposed plan. Consequently, revision of scoring is not within the remit of this examination. In any case, I have responded directly to the matters raised by the promoters in relation to scoring through my findings above.

57. I note that allocation of the site for housing would enable funding for the kirk's community hub and on-going kirk maintenance. Despite those benefits, I find that the information submitted is insufficient for me to conclude in favour of the Trustees. The harm to greenspace and impact on the setting of the B-listed kirk mean that I am not persuaded to include the site for housing or remove the protected urban greenspace designation from the proposed plan.

(k) LDP2-27 Humbie Road, Newton Mearns (CS046)

58. Robertson Homes seeks the inclusion of a site between Humbie Road and Waterfoot Road for housing in the proposed plan. The site is in agricultural use, extends to 5.7 hectares and lies on the southern edge of Newton Mearns. The land contributes to the rural character of the area. It slopes to the south, which increases its visibility in that direction.

59. A development framework report for the site proposes around 95 dwellings, including 25% affordable homes. The council has assessed the site as having good access to local services and facilities, and a potential pedestrian connection through Mearnscroft Gardens could improve accessibility. The examination report for the adopted local development plan found that the site had potential for housing development if there were a shortage of housing land in this part of East Renfrewshire.

60. However, the site would result in development projecting into open countryside. Moreover, allocation of the site would involve releasing land from the green belt, which is not necessary as the examination has concluded in Issue 14 that the proposed plan would provide sufficient housing to meet the housing land requirement without the need for further housing allocations. Consequently, there is no justification for removing the site from the green belt or for adding it site to Schedule 15: Housing Sites.

(l) LDP2-29 Whitecraigs Golf Course, Newton Mearns (CS017 + new areas)

61. Mactaggart and Mickel together with Whitecraigs Golf Club seek the inclusion of four sites (A to D) for housing in the proposed plan. These are located on or near Whitecraigs Golf Course and would be enabling developments as part of a scheme to improve that course. All four sites, along with the golf course itself, fall within the green belt and form part of the wider green network.

62. A masterplan indicates that Site A is part of the existing course adjacent to existing flats at Whitecraigs Court. As with sites B and C, it fronts onto Ayr Road. It is stated to have potential for 24 houses and 57 apartments in 3 blocks. Site B is also part of the existing course. It stands behind a line of conifers, and has potential for approximately 45 apartments in 3 blocks. Site C is again part of the existing course. It lies to the rear of the Barrhead Travel office, between Nethererton Road and Capel Avenue. It has potential for approximately 9 houses and 19 apartments in one block. A number of mature trees separate the site from adjacent properties. Site D at Barcapel, to the north-west, does not form part of the course and its merits are addressed separately as site LDP2-09 under (e) above. It has potential for approximately 37 detached and semi-detached houses.

63. The masterplan states that the four sites together would deliver, in round terms, about 200 units of which 50 would be affordable. It also promotes extension of the golf course onto the southern part of the land at Barcapel.

64. Sites A, B and C are situated within the built-up area in sustainable locations, a short walk from shops, bus stops and train stations at Whitecraigs and Patterton. As the Council acknowledges, improvements to the golf course and securing the club's longer term future would benefit sports provision, and golf is recognised as a recreational use compatible with green belt status. Nor does the council contest that the sites are effective and deliverable.

65. However, allocation of the site would involve releasing land from the green belt, which is not necessary as the examination has concluded in Issue 14 that the proposed plan would provide sufficient housing to meet the housing land requirement without the need for further housing allocations. Consequently, there is insufficient justification for removing these sites from the green belt or for adding them to Schedule 15: Housing Sites.

Reporter's recommendations:

No modifications.

Issue 25	Submitted Housing Supply Neilston	
Development plan reference:	Policy SG1: Housing Supply, Delivery and Phasing Schedule 15: Housing Sites	Reporter: Alasdair Edwards
Body or person(s) submitting a representation raising the issue (including reference number):		
Lynch Homes (505/1) (505/2) (505/3) Barratt Homes West (511/1) (511/2)		
Provision of the development plan to which the issue relates:	Chapter 4: Promoting Sustainable and Inclusive Economic Growth Alternative Housing Development Proposals: <ul style="list-style-type: none"> • LDP2-26 Uplawmoor Road, Neilston (CS048) • LDP2-31 Nether Kirkton Farm, Neilston (CS010) Supporting Documents: <ul style="list-style-type: none"> • Site Evaluation • Strategic Environmental Assessment 	
Planning authority's summary of the representation(s):		
<p><u>Objections</u></p> <p><u>(a) LDP2-26 Uplawmoor Road, Neilston (CS048)</u></p> <p><u>Lynch Homes (505/1) (505/2) (505/3)</u></p> <ul style="list-style-type: none"> • Objects to the non-allocation of land at Uplawmoor Road, Neilston (CS048) for residential development of 80 homes. • 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. • 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. • Representee submitted a development framework in support of their proposal. • The site is in a sustainable location with an easy walk to bus services as well as local services and amenities. • 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). • The updated SEA Assessment also demonstrates that the proposal will have an overall positive impact on the environment. 		

(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 Development Framework diagrams and 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/68) and Clydeplan (2017) (CD/80) 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, as further explained under Tables 9 and 10 of the Education Background Report (BR4) (CD/28).

Site Evaluation and Strategic Environmental Assessment

- Representations for site (a) objected to the scoring and findings of the Site Evaluation (CD/34) and Strategic Environmental Assessment (CD/33).
- 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.

Objections

(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 Green Belt Landscape Character Assessment (CD/42a) (CD/42b) 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 closet 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) which was refused by the Council and on appeal (PPA-220-2022) (CD/64) 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' and also falls out with the settlement boundary within

the Green Belt.

- 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 Green Belt 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) (LDP2 Proposed Plan reference) 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' and also falls out with the settlement boundary within the Green Belt.
- 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.

Reporter's conclusions:

Housing Context

1. As expressed in Issue 14 (housing supply, delivery and phasing) the proposed plan provides sufficient housing to meet the housing land requirement, and provides a sufficient range and choice, without the need for further housing allocations. There is therefore no numerical justification to allocate further sites for private housing.

Site Evaluation and Strategic Environmental Assessment

2. This examination is concerned with unresolved issues to the proposed plan. The site evaluation and strategic environmental assessment scoring of sites are separate but informative to plan preparation. Consequently, revision of scoring is not within the remit of this examination. Furthermore, as there is no requirement for additional housing land to be identified in this local development plan, the scoring of one potential site relative to another is not a relevant consideration. Where parties have raised issues which apply directly to a site, then I have responded to those matters below.

Uplawmoor Road

3. Grassland to the north of Uplawmoor Road and west of an access route to the rear gardens on Lintmill Terrace is promoted for 80 homes. The 3.5 hectare site has been promoted several times for housing in the last decade. The examination into the finalised East Renfrewshire Local Plan in 2010 rejected the site and the subsequent examination into the now adopted East Renfrewshire Local Development Plan (2015) also concluded not to allocate the site due to issues of greenbelt and biodiversity impact. An application for planning permission in principle was also refused in 2012 with a following appeal dismissed in 2013 (DPEA reference PPA-220-2022).

4. The site is accessible to a range of facilities and sustainable transportation modes. There is also, as noted by the council and within past assessments, potential merit in utilising some of the eastern part of the site for housing tied to careful landscaping. The site is also considered effective and is within the control of an active house-builder. However, there have been no changes in circumstance since the conclusion of other assessments to reject the promoted site for housing. There is no housing need at present which is not being met elsewhere. The land remains entirely within a designated local biodiversity site; it is part of the green network; it retains a moderate to strong green belt sensitivity; and it continues provide an open and rural setting for Neilston on approach from the west. Furthermore, the site provides benefits for amenity and recreation with informal pathways leading to formal paths along the Lavern Water to the north and to a wetland/pond to the west. In these circumstances, I find that the site should remain in in the green belt and not be allocated for housing.

Nether Kirkton Farm

5. An extensive area containing two grass fields and an area of woodland east of Kirktonfield Road and south of Neilston Road is promoted for 120 homes (including 25% affordable). The site slopes considerably from east to west to the gardens of properties on Neither Kirkton Way as a single field before flattening further west into the second field.

Hedgerows and the Kirkton Burn are located within the site.

6. The site was previously considered and rejected for the allocation of 120 to 150 homes through the examination into the now adopted East Renfrewshire Local Development Plan (2015). At that time, the reporter concluded that development of the site would not naturally round-off Neilston being of a too large a scale; and found the site to be prominent where development would cause visual impact and harm to the landscape character.

7. I note the findings of the submitted transport and access appraisal and agree that the site is accessible to local facilities/services and sustainable transport modes. The development of housing on the opposite side of Neilston Road (proposal SG1.19) extends the built form of Neilston which the promoted site could align with to form a new settlement boundary. The edge of the site could be reinforced with landscaping and structured planting maturing over time. The upper western field adjacent to Kirktonfield Road is also less prominent with containment from housing on three sides and woodland on the fourth. Education capacity is noted as a constraint but one which the promoter considers could be addressed.

8. However, there have be no substantive changes of circumstance since the past examination findings. There is no need for additional housing land to be found. The eastern field continues to command a prominent position on rising land providing a green gateway entrance to Neilston from Barrhead with corresponding landscape and aesthetic value. It is located within the green network and contains part of a local biodiversity site, albeit that I note from the submitted development framework that this area would be retained and potentially enhanced. I find that, overall, the site should remain as designated green belt and not be allocated for housing.

Reporter's recommendations:

No modifications.

Issue 26	Submitted Housing Supply Uplawmoor	
Development plan reference:	Policy SG1: Housing Supply, Delivery and Phasing Schedule 15: Housing Sites	Reporter: Alasdair Edwards
Body or person(s) submitting a representation raising the issue (including reference number):		
Mactaggart & Mickel (507/1) (507/2)		
Provision of the development plan to which the issue relates:	Chapter 4: Promoting Sustainable and Inclusive Economic Growth Alternative Housing Development Proposals: <ul style="list-style-type: none"> • LDP2-28 Uplawmoor West (CS063) Supporting documents: <ul style="list-style-type: none"> • Site Evaluation 	
Planning authority's summary of the representation(s):		
<p><u>Objections</u></p> <p><u>(a) LDP2-28 Uplawmoor West (CS063)</u></p> <p><u>Mactaggart & Mickel (507/1) (507/2)</u></p> <ul style="list-style-type: none"> • Objects to the non-allocation of land at Uplawmoor West (CS063) for residential development. • 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. • 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. • Small infill site which could contribute positively to the village. • The site is effective. • Evaluation for this site should be 18 and not 11 as stated in the site evaluation. • Representee submitted a Development Framework in support of their proposal. • There are no significant education capacity constraints in the Lavern Valley sub-area within East Renfrewshire in any sector. No Education constraint affecting Uplawmoor. 		
Modifications sought by those submitting representations:		
<p><u>(a) LDP2-28 Uplawmoor West (CS063)</u></p> <p><u>Mactaggart & Mickel (507/1) (507/2)</u></p> <ul style="list-style-type: none"> • Inclusion of the site within Schedule 15 of the Proposed LDP2 for residential development and identification on the associated Proposals Map. • Removal of Policy D5: Open Space designation. 		

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/68) and Clydeplan (2017) (CD/80) 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, as further explained under Tables 9 and 10 of the Education Background Report (BR4) (CD/28).

Site Evaluation

- Representations for site (a) objected to the scoring and findings of the Site Evaluation (CD/34).
- 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.

Objections**(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/65).
- 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:

1. Protected urban greenspace to the south of Neilston Road within the urban area is promoted for 25 homes. An indicative layout (and supporting information) identify that the site would be accessed from Neilston Road with an integrated layout and sensitive landscape response. Housing and gardens are located to the west, north and east with Pollick Glen to the south of the site (a local biodiversity site with a core path running east to west along the edge of the promoted site). The site is covered by a tree preservation order.

2. The site has a long planning history with it being allocated for housing in the Renfrew County Development Plan (1955) and retained in the 1964 review of that plan. In the Renfrew District Rural Area Local Plan 1989 it was included within the settlement boundary and promoted for open space but with an allowance for infill development where water supply constraints were overcome. A reporter recommended allocation of the site for housing (25 units) following an inquiry into the East Renfrewshire Local Plan (2002) but the council refused to accept that recommendation and the site was retained as white land within the village boundary. A subsequent planning application for housing on the site in 2003 was refused with the resulting planning appeal dismissed in April 2004 (DPEA reference PPA-220-75). The land was also put forward for housing when the East Renfrewshire Local Development Plan (2015) was prepared but the report of examination into that plan concluded that the site remain as protected urban greenspace.

3. Development of the site presents some opportunities for enhancement. The site could improve connections between the village and the glen, enhance biodiversity and provide useable open space. Trees of value could be retained. Suitable access from Neilston Road could likely be provided. The site is also well contained by surrounding landscape and could integrate into the settlement with other houses/gardens on the east, west and northern boundaries. The site is also considered "effective" by the promoter, which is not disputed by the council.

4. However, the past examination report clearly concludes that the site “is an important open space which could be enhanced and warrants its designation as protected urban greenspace”. While I note that the site continues to be overgrown there is no change in circumstances that would support a reversal of this past conclusion. I consider that the site provides amenity value to the settlement and supports the provision of a diverse and multi-functional network of urban greenspace as referred to in proposed policy D5 (protection of urban greenspace). The site remains an important greenspace. I disagree with the promoter that the designation is inappropriate within a small settlement as it covers protected greenspaces within urban areas (those within settlement boundaries).

5. Allocation of the site for housing would contribute to the housing land supply and provision of affordable housing. However, as detailed in my conclusions in Issue 14 (housing supply, delivery and phasing) the proposed plan provides sufficient housing to meet the housing land requirement, and provides a sufficient range and choice, without the need for further housing allocations. The matter of education capacity is addressed in Issue 14 where it is noted that there is, based on the information submitted, insufficient education capacity to accommodate development within Uplawmoor at present.

6. In addition, while the promoters question the site evaluation and strategic environmental assessment scoring, this examination is only concerned with unresolved issues to the proposed plan. Consequently, revision of scoring is not within the remit of this examination. In any case, I have responded directly to the matters raised by the promoters in relation to scoring through my findings above.

7. Taking all of the above into account and despite some potential benefits of development, I find that there is insufficient justification to remove the urban greenspace designation and allocate the promoted site for housing within the proposed plan.

Reporter’s recommendations:

No modifications.

Issue 27	Submitted Housing Supply Waterfoot	
Development plan reference:	Policy SG1: Housing Supply, Delivery and Phasing Schedule 15: Housing Sites	Reporter: Alasdair Edwards
Body or person(s) submitting a representation raising the issue (including reference number):		
Wallace Land Investments (489/1) (489/2) (489/3) Robertson Homes (510/1) (510/2) Gladman Developments Ltd (571/1) (571/2)		
Provision of the development plan to which the issue relates:	Chapter 4: Promoting Sustainable and Inclusive Economic Growth Alternative Housing Development Proposals: <ul style="list-style-type: none"> • LDP2-19 Floors Farm, Waterfoot (CS049) • LDP2-30 Glasgow Road (south-west), Waterfoot (CS062) • LDP2-32 Glasgow Road, Waterfoot (CS039) Supporting documents: <ul style="list-style-type: none"> • Site Evaluation • Strategic Environmental Assessment 	
Planning authority's summary of the representation(s):		
<p><u>Objections</u></p> <p><u>(a) LDP2-19 Floors Farm, Waterfoot (CS049)</u></p> <p><u>Wallace Land Investments (489/1) (489/2) (489/3)</u></p> <ul style="list-style-type: none"> • Objects to the non-allocation of land at Floors Farm, Waterfoot (CS049) for residential development of 1340 homes. • Proposal will create a new village, improved public transport, and a new primary school. • 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. • 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. • Representee submitted a development framework in support of their proposal. • 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. • 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. • 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 (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 a Development Framework 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 Vision Document 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/68) and

Clydeplan (2017) (CD/80) 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, as further explained under Tables 9 and 10 of the Education Background Report (BR4) (CD/28).

Site Evaluation and Strategic Environmental Assessment

- Representations for site (a) objected to the scoring and findings of the Site Evaluation (CD/34) and Strategic Environmental Assessment (CD/33) and for sites (b) and (c) to the Site Evaluation only.
- 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.

Objections

(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 Green Belt Landscape Character Assessment (CD/42a) (CD/42b) 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 Green Belt 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’ and also falls out with the settlement boundary within the Green Belt.

- 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 Green Belt 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’ and also falls out with the settlement boundary within the Green Belt.
- An application from Gladman for residential development (2017/0367/TP) was appealed against the Council’s failure to issue a decision PPA-220-2042. This appeal was refused by Scottish Ministers on 1st February 2018 (CD/66).

- 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:

Housing Context

1. As expressed in Issue 14 (housing supply, delivery and phasing) the proposed plan provides sufficient housing to meet the housing land requirement, and provides a sufficient range and choice, without the need for further housing allocations. There is therefore no numerical justification to allocate further sites for private housing.

Site Evaluation and Strategic Environmental Assessment

2. This examination is concerned with unresolved issues to the proposed plan. The site evaluation and strategic environmental assessment scoring of sites are separate but informative to plan preparation. Consequently, revision of scoring is not within the remit of this examination. Furthermore, as there is no requirement for additional housing land to be identified in this local development plan, the scoring of one potential site relative to another is not a relevant consideration. Where parties have raised issues which apply directly to a site, then I have responded to those matters below.

Floors Farm

3. Wallace Land Investments promotes 76.2 hectares of farmland surrounding Floors Farm for 1,340 homes (44.6 hectares residential at 30 homes per hectare); a potential site for a primary school/community hub (4 hectares); open space (4.7 hectares); links to the strategic cycle corridor; and landscaping. The allocation is described as a self-sustaining village with active developer interest and a programme for housing delivery of 560 homes to 2029 and 780 homes beyond.

4. Details of a potential layout are provided in an indicative development framework which shows the retention of the existing Floor Farmhouse and cottage together with a house on the entrance to the farm at Floors Road. The land is bound to the west by Humbie Road and dissected north/south by Floors Road. A woodland (subject to a tree preservation order) is located within the site south of Floors Road (Floors Wood). Various drains and issues are located across the area together with the Earn Water flowing adjacent to, and just within, the site to the north; the Plumb Burn located within the site; and the Brackenrig Burn located within the site to the south of Floors Road. The land is located within the greenbelt and primarily used as grass pasture which, as identified by the promoter, is not prime agricultural land. Fields are separated by hedgerows, stone dykes and post and wire fencing.

5. Scottish Planning Policy suggests that “the creation of a new settlement may

occasionally be a necessary part of a spatial strategy, where it is justified either by the scale and nature of the housing land requirement and the existence of major constraints to the further growth of existing settlements, or by its essential role in promoting regeneration or rural development” (paragraph 53). The promoted site is some 600 metres west of Waterfoot and some 400-500 metres south of Burnhouse. Development at this location would represent an entirely new entity or “village” (as described by the promoters). The development strategy contained in the proposed plan sponsors a ‘compact city’ model following the strategy of Clydeplan (the strategic development plan for Glasgow and the Clyde Valley, approved 2017). The proposed plan does not put forward the creation of any new settlement(s) as part of the development strategy but endorses the sustainable growth and expansion of established urban areas continuing the strategy of the adopted East Renfrewshire Local Development Plan (2015). I find that there is no justification or necessity to support the creation of a village remote from existing settlements at this time.

6. Development on the scale envisaged would represent some 28% of the housing land requirement to 2031 (1,340 of the 4,802 homes required). Even if there was an unmet housing need, this equates to a substantial development which is only supported by a single annotated indicative layout drawing and a revised site evaluation and strategic environmental impact assessment (conducted by the promoter). There has been no community engagement, technical studies or consultation with key agencies to confirm that development on the scale envisage, in the location sought, would be suitable and free from constraints. I appreciate that the site is being promoted at an early stage in the planning process but the lack of supporting information and consultation means that there is limited justification to support allocation for development.

7. I note that the creation of a new village could provide opportunities to provide land for education which might alleviate education pressures, albeit that only the land is offered within the submission with no commentary on financing a new-build primary school on the site. Additionally, I am unaware if the location of a primary school in this location would be suitable in relation to the catchment and requirements of the education authority. I further note that a community hub could be provided on-site. There is no description of what amenities would be provided in the hub but I agree with the promoter that provision of any could be beneficial in relation to accessibility and reducing the need to travel.

8. The site is open and rural providing relief from nearby settlements, particularly when travelling along Humbie Road and the A726 to the west. The green belt retains a moderate to strong sensitivity. While development of the site could introduce landscaping and structured planting to screen the development (and enhance biodiversity) the loss of valuable green belt would be substantial. The creation of a village would also introduce a large urban area to the west of Waterfoot and south of Burnhouse (Newton Mearns) narrowing the gap between the settlements with only relatively narrow strips of green belt being retained between these settlements and the new village. The impact on the greenbelt would be significant and adverse.

9. The land is considered to be capable of delivering housing; it could be designed to link to existing sustainable transport networks; and it could potentially provide a new bus route. Despite these benefits I find that, overall, there is insufficient justification to allocate the land for housing. The land should remain as green belt.

Glasgow Road (south-west)

10. An 8.4 hectare area of grass farmland to the west of Glasgow Road (B767) and south

of East Brackenrig Road is promoted for 120 homes (including affordable). A supporting indicative spatial masterplan report (2019) further suggests some potential for commercial development. The report includes a detailed analysis of the site and context; a landscape and visual assessment; an ecological assessment; and a framework masterplan. The masterplan shows housing accessed from Glasgow Road with structured landscaping and woodland planting on the extremities; a sustainable urban drainage system on the south-western edge; a large play area to the south; a central area of public open space; and a potential area for commercial (retail) to the north-east of the site. Formal and informal walkways are shown along with tree-lined streets.

11. The site is part of the green belt and green network. It is bound by Glasgow Road to the east (with housing opposite on Glasgow Road and Low Borland Way). A post and wire fence provides the boundary to the north before an area of rough grassland, the Brackenrig Burn and the mature tree-lined East Brackenrig Road (a private access road to an electronics factory - Linn Products Limited). The southern boundary is open but marked by the Borland Burn before further grassland, a small cluster of buildings and the A726 dual carriageway. The western boundary abuts further fields marked with post and wire fencing. The site slopes from the southern boundary northwards.

12. The site is covered by a tree preservation order. However, only a few trees are located on the edges of the site and these are shown to be retained in the masterplan.

13. I agree with the council that the green belt in this location provides an open and rural setting to Waterfoot and retains a moderate to strong sensitivity to development. The topography of the site means that housing development would be highly visible, particularly approaching the settlement from the south. I appreciate that new woodland planting and landscaping could mitigate visual impact but this would likely take a long period to establish. I further note that development could have aligned with land east of Glasgow Road (promoted for housing by the council through the main issues report) to create a new settlement boundary to the south. However, this site was not progressed as an allocation in the proposed plan. I consider that the allocation of land to the west of Glasgow Road would create a harmful intrusion into the green belt without sufficient justification for its loss.

14. There are no shops or services within Waterfoot. Some form of retail/commercial development to support the neighbourhood could, potentially, be beneficial in providing for local needs, reducing the need to travel and job creation. However, without an indication of the floorspace and/or uses sought it is difficult to determine whether this aspect of the proposal is reasonable. Indeed, some forms and scales of commercial/retail development could be at odds with the sequential approach and detrimental to the maintenance of a network of town and neighbourhood centres. I realise that this is an optional addition so this aspect has not weighed heavily in my findings.

15. It is not a requirement of Scottish Planning Policy or Clydeplan to provide new housing sites in each and every settlement. I have found in Issue 14 that there is a sufficient range and choice of housing across the local authority. Therefore, I disagree with the promoter that housing in Waterfoot is required even if there is proven demand. There is no need for additional housing at this time. I note that the site is considered to be effective in the control of an active house-builder. I also note that development could provide economic benefits and enhance biodiversity. However, I find that the site provides a valuable setting to Waterfoot and contributes to the wider green network. Overall, I find that the site should not be allocated for housing. No change to the proposed plan is required on this basis.

Glasgow Road

16. An area of some 20 hectares of grassland south of Floors Road, west of Glasgow Road and north of East Brackenrig Road is promoted for a mixed-use development of 200 homes (including 30% affordable); a neighbourhood centre; and a primary school with nursery facilities. Development would also incorporate a new village green and improved cycle and core path facilities.

17. The promoted site is located within the green belt and the green network. The land was previously suggested for housing when the now adopted East Renfrewshire Local Development Plan (2015) was being prepared. The examination into that plan rejected the site for 100 homes as a “significant intrusion into the green belt and a major change to the landscape setting of Waterfoot”. An appeal against the non-determination of planning permission in principle for up to 200 homes (40% affordable) on the site was dismissed in 2018 (DPEA reference PPA-220-2042).

18. The site is primarily grassed pasture with four pockets of mature woodland and hillocks. The land generally falls in level from Floors Road southwards to East Brackenrig Road. A stone dyke runs along the Glasgow Road boundary providing a solid boundary with mature gardens of houses opposite. The northern boundary on Floors Road contains a low stone dyke with open front gardens of houses beyond to the north-east and further grassland to the north-west. The western boundary is not currently defined with the grass continuing from the promoted site into more grassland. Mature trees along East Brackenrig Road and the Brackenrig Burn form the southern boundary.

19. The site is open and rural with the mature trees providing a parkland appearance. While there are houses on the opposite of Glasgow Road the hedges and trees within their gardens mean that the houses are fairly concealed from view. I agree with the findings of the reporter into the planning appeal that this situation means that only a small area to the north-east of the site, in visual terms, has a close built form relationship with the promoted site. The site provides a valuable contribution to the setting of Waterfoot and retains a moderate to strong sensitivity to development. With its open connection to surrounding farmland the site also contributes to the wider green network.

20. Promotion of land for education could alleviate capacity issues and I note that the promoter and landowner are willing to work in partnership with the council to provide this resource. However, I am not aware if the location of a primary school in this location would be suitable in relation to the catchment and requirements of the education authority. I also agree that the provision of retail could be beneficial to the settlement but dependant on the scale envisaged (as addressed in paragraph 13 above). The creation of a village green, open space, improvement of cycle infrastructure and core paths, enhanced landscaping and the provision of additional affordable housing over the 25% normally sought would be beneficial to the populous, active travel and biodiversity. I also note that the site is considered to be effective and is in the control of an active promoter of housing development. However, I find that overall the loss of green belt and green network is not justified. The site should not be allocated for housing.

Reporter’s recommendations:

No modifications.

Issue 28	Housing Mix and Affordable Housing	
Development plan reference:	Policy SG2: Housing Mix Policy SG4: Affordable Housing	Reporter: Alasdair Edwards
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Persimmon Homes (397/5) Homes for Scotland (476/2) (476/3) Barratt Homes West (484/1) Scottish Government (486/8) Mactaggart & Mickel (493/1) (493/2) Robertson Homes (495/6)</p>		
Provision of the development plan to which the issue relates:	Section 4: Promoting Sustainable and Inclusive Economic Growth Meeting Housing Needs	
Planning authority's summary of the representation(s):		
<p><u>(a) Policy SG2: Housing Mix</u></p> <p><u>Objections</u></p> <p><u>Persimmon Homes (397/5), Homes for Scotland (476/3), Barratt Homes West (484/1), Robertson Homes (495/6)</u></p> <ul style="list-style-type: none"> • 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. • 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. • 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.

- 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

Objections

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), Barratt 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

Objections

Persimmon Homes (397/5), Homes for Scotland (476/3), Barratt Homes West (484/1), Mactaggart & Mickel (493/1), Robertson Homes (495/6)

- The Council's Local Housing Strategy (2017- 2022) (LHS) (CD/45) 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/81), 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/68) and Clydeplan (CD/80) 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

Objections

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/70) 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/09) 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/01) 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:

Policy SG2 (housing mix)

1. Paragraph 132 of Scottish Planning Policy requires local authorities, through a housing need and demand assessment, “to consider the need for specialist provision that covers accessible and adapted housing, wheelchair housing and supported accommodation”; and that “where identified, planning authorities should prepare policies to support the delivery of appropriate housing”.

2. Chapter 6 of ‘The Glasgow and the Clyde Valley Housing Need and Demand Assessment’ (May 2015), which covers East Renfrewshire, assesses specialist provision. It estimates demand from unmet need for some 5,600 to 5,900 accessible and wheelchair accessible homes across the strategic area but does not provide refined figures at the local authority level. I understand that the estimate includes adaptation of existing stock and new build. It concludes that mandatory building regulations include enhanced accessibility and adaptability standards for all new homes meaning that “there is a growing supply of mainstream properties that are equally suited for people with mobility, dexterity and/or sensory disabilities”; and that “the regulations are expected to make a significant impact on the profile of the housing stock. As a consequence, no further measures are recommended here with respect to accessible housing”. However, the assessment also concludes that “building standards do not meet the needs of all wheelchair users and other people with physical disabilities” and that local authorities may wish to draw on locally available information to respond.

3. The council’s publication ‘People. Homes. Brighter Futures – Our Strategy for Housing in East Renfrewshire (2017-2022)’ states that “enhanced accessibility standards for new build homes are expected to make a significant impact on the profile of the housing stock over time. We will also endeavour to ensure that at least 10% of new social rented homes are, or can be made accessible, through the LHS [local housing strategy] and LDP [local development plan]”. The need for substantial adaptations to meet needs within existing homes is also noted.

4. Drawing on the above, I find that there is a need and demand for accessible and wheelchair housing in East Renfrewshire but, from the evidence submitted, the actual or estimated level of need at the local authority level is not certain. Of significance is that the building standards include provision for new homes to be accessible and wheelchair accessible and the council is actively seeking to encourage adaptation and provision in social rented accommodation. The provision in proposed local development plan policy SG2 (housing mix) for proposals to include a minimum of 10% of all homes to be designed as wheelchair accessible or easily adaptable is, I find, in these circumstances unnecessary

with limited justification for inclusion. I therefore agree with parties that this provision should be removed. However, I agree with the council that there is a requirement to encourage adaptability and allow for designs that go beyond building standard requirements. Consequently, I find the text promoted by the council as a replacement to the 10% requirement is reasonable and acceptable. In addition, I find the slight revision to the first paragraph of policy SG2 to refer to both integration of housing types and sizes reasonable to provide clarity to developers reading the policy. These changes are recommended below.

5. Turning to the matter raised by the Scottish Government, the housing need and demand assessment identifies that there was no accurate estimate of Gypsy / Travellers and Travelling Showpeople in the strategic area. The 2011 census data identifies that some Gypsy/Traveller households were living in Glasgow (typically in settled accommodation) and the Lanarkshires/West Dunbartonshire (on sites) with most Travelling Showpeople living in the wider Glasgow area. According to the census data some 16 Gypsy/Travellers lived within East Renfrewshire in 2011 (0.02% of the local population). The assessment notes, at paragraph 6.12.6, that East Renfrewshire was, in partnership with others, investigating the requirement for a transit site for Gypsy / Travellers within their area but that no proposal had been taken forward. The council's local housing strategy indicates that there is no site provision or significant demand for this in East Renfrewshire. The response from the council in the section above demonstrates that consideration of Gypsy/Travellers and Travelling Showpeople has been undertaken. However, I consider that it would be prudent for the proposed plan to identify that the matter has been considered and refer to the council's commitment to understanding need in the area. Additional text, as suggested by the council, is therefore recommended.

6. The unresolved issue raised by Mactaggart and Mickel related to "affordability" is addressed in Issue 14 (housing supply, delivery and phasing).

Policy SG4 (affordable housing)

7. Proposed policy SG4 (affordable housing) requires residential proposals of four or more dwellings to provide a minimum 25% affordable housing contribution. While I appreciate that this could be onerous on some small-scale builders this threshold is not novel but the same as that contained within policy SG5 (affordable housing) of the adopted East Renfrewshire Local Development Plan (2015). I note that Scottish Planning Policy states that affordable housing contributions should be "as part of a viable housing development" (paragraph 129) and Clydeplan policy 9 (housing – affordable and specialist provisions) notes that any affordable housing contribution policies "are applied in a manner that enables the delivery of housing developments". The reasoned justification supporting proposed policy SG4 follows these provisions in stating that the council "will continue to apply a flexible approach to the provision of affordable housing and work actively with developers to find and apply appropriate solutions to affordable housing delivery on a case by case basis"; as well as noting that the policy "will maximise provision to meet identified local housing need without threatening the viability of sites". The council has also indicated in its response above that it would be willing to review contributions based on its affordable housing supplementary planning guidance – an approach which is likely to be adopted in the affordable housing supplementary guidance referred to in proposed policy SG4. I find that the threshold of four or more units is reasonable in these circumstances without the need to increase it to 12 units as promoted by Homes for Scotland. No change to the proposed plan is required to address this matter.

8. While promoted by Mactaggart and Mickel, the deletion of the affordable housing contributions policy would not be reasonable or appropriate. The general policy requirement for a minimum 25% contribution is supported by Homes for Scotland as being consistent with Scottish Planning Policy. Furthermore, as noted by the council, not all the sites allocated in the proposed plan have planning permission; there might be revisions/amendments to existing permissions; and there could be sites where the permission lapses and requires re-application. In addition, non-allocated windfall sites are also likely to come forward during the plan period. Inclusion of the policy is logical and it should remain in the proposed plan.

Reporter’s recommendations:

Modify the proposed local development plan by:

1. Inserting a new final paragraph on page 97 as follows:

“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 councils to increase our understanding of Gypsy/Traveller needs in the local area and our practice in line with national guidance.”.

2. Replacing the final sentence in the first paragraph of Policy SG2: Housing Mix on page 98 with:

“The different types and sizes of housing are required to be well integrated throughout the development.”.

3. Replacing the second paragraph of Policy SG2: Housing Mix on page 98 with:

“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.”.

Issue 29	Economic Development	
Development plan reference:	Policy SG5: Economic Development Policy SG8: Digital Communications Infrastructure Policy SG9: Tourism and Visitor Economy	Reporter: Gordon S Reid
Body or person(s) submitting a representation raising the issue (including reference number):		
<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>		
Provision of the development plan to which the issue relates:	Chapter 4: Promoting Sustainable and Inclusive Economic Growth Promoting a Successful Economy	
Planning authority's summary of the representation(s):		
<p><u>(a) Policy SG5: Economic Development</u></p> <p><u>Support</u></p> <p><u>Scottish Enterprise (250/1)</u></p> <ul style="list-style-type: none"> • 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. <p><u>Aldi Stores (474/3)</u></p> <ul style="list-style-type: none"> • 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. • Supports this position and the role retail plays in promoting economic development in centres. <p><u>Objections</u></p> <p><u>Scottish Enterprise (250/2)</u></p> <ul style="list-style-type: none"> • 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. 		

- Appreciates the need to have an Economic Development policy that takes a flexible approach to the use of safeguarded business and employment areas where 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 (serviced 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 Mearnskirik 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

Objections

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

General Comment

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.

Objections

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/68) 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/82) 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/06) 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 Malletshead 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

Objections

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 5th and 7th 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

General Comment

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:

Policy SG5: Economic Development

1. The general support in the representations from Scottish Enterprise and Aldi Stores for proposed policy SG5 (economic development) is noted but requires no examination.
2. Criterion 1 of proposed policy SG5 advises that the council will monitor changes to the business and employment land supply through the annual Business and Employment Land Audit. The council highlight, and I agree, that this approach is consistent with each of the other Clydeplan authorities and paragraphs 101 to 102 of the Scottish Government's 'Scottish Planning Policy'. In addition, criterion 2 does not seek to limit the range of business uses to particular use classes. Furthermore, in terms of proposals for non-employment generating development and the question of viability, I note that three criteria are provided in the final paragraph of the policy related to these matters. These set out what evidence is required including current and future demand, the demonstration that the site or premises are shown to be unviable and that it has been actively marketed for a

minimum period of 24 months. Overall, I am satisfied that the wording of proposed policy SG5 sufficiently covers the matters raised by Scottish Enterprise in its representation and find that no modification is, therefore, required to the policy.

3. I note that the council through proposed policy M2.1 (M77 strategic development opportunity - Maidenhill/Malletsheugh, Newton Mearns) supports the comprehensive redevelopment of the Maidenhill area in accordance with the approved master plan (June 2015). The redevelopment of the area encourages a wide range of uses including a neighbourhood centre, community/leisure facilities, green infrastructure and active travel routes in addition to new housing. While the Broom, Kirkhill and Mearnskirik Community Council suggest that past planning decisions have focussed on housing delivery I find that there is sufficient provision in the proposed plan to support the delivery and integration of local commercial enterprises. No change to the wording of the plan is required to respond to the community council's concerns.

Policy SG8: Digital Communications Infrastructure

4. I agree with Scottish Natural Heritage (now NatureScot) that a slight modification to paragraph 1 of policy SG8 (digital communications infrastructure), to include the additional words 'including cumulative', 'setting' and 'visual amenity', would help to provide clarity on the matters the council require to be taken into account in the consideration of proposals for new digital communications infrastructure.

Policy SG9: Tourism and Visitor Economy

5. The support in the representation by VisitScotland for the range of measures, within the proposed plan and policy SG9 (tourism and visitor economy), that aim to encourage new and repeat visits to the area and provide for further potential investment opportunities, is noted but does not require any examination.

Reporter's recommendations:

Modify the proposed local development plan by:

1. Amending the wording of paragraph 1 of Policy SG8: Digital Communications Infrastructure on page 111 to read as follows:

"The Council supports the provision and expansion of a digital and communications infrastructure network that provides high speed broadband for residents and businesses, provided they will not result in a detrimental impact, including cumulative, upon the setting, character or visual amenity of an area."

Issue 30	Town and Neighbourhood Centres	
Development plan reference:	Policy SG10: Town and Neighbourhood Centre Uses	Reporter: Gordon S Reid
Body or person(s) submitting a representation raising the issue (including reference number):		
Aldi Stores (474/1) (474/2)		
Provision of the development plan to which the issue relates:	Chapter 4: Promoting Sustainable and Inclusive Economic Growth	
Planning authority's summary of the representation(s):		
<p><u>Support</u></p> <p><u>Aldi Stores (474/2)</u></p> <ul style="list-style-type: none"> • Fully support the 'town centre first principle' set out within SPP and within the emerging LDP2. • Note that part 1 of Policy SG10 promotes new retail investment within LDP2's defined network of town and neighbourhood centres as a result. <p><u>Object</u></p> <p><u>Aldi Stores (474/1)</u></p> <ul style="list-style-type: none"> • 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. • 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. 		
Modifications sought by those submitting representations:		
<p><u>Aldi Stores (474/1)</u></p> <ul style="list-style-type: none"> • Policy SG10 requires to be revised to reflect SPP as follows: <ul style="list-style-type: none"> ○ 2.c: "Demonstrate that the proposal will help to meet proven qualitative and or quantitative deficiencies". ○ 2.d: "Demonstrate that there will be no unacceptable individual or cumulative impact on the vitality and viability of any town or neighbourhood centre" 		

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/68). It is acknowledged that paragraph 73 3rd 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 4th 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:

Policy SG10: Town and Neighbourhood Centre Uses

1. The support by Aldi Stores for the inclusion of both the ‘town centre first principle’ in the

proposed plan, and the promotion of new retail investment within the defined network of town and neighbourhood centres within policy SG10 (town and neighbourhood centres), is noted but does not require any examination.

2. I consider that the inclusion of the word ‘and’ rather than the word ‘or’ in criterion 2c of policy SG10 would not accurately reflect the requirements of bullet point three of paragraph 73 of Scottish Government publication ‘Scottish Planning Policy’ which supports proposals which help to meet qualitative or quantitative deficiencies. Therefore, I agree with Aldi Stores that the proposed wording would introduce a more onerous test than stated in Scottish Planning Policy. Accordingly, I consider that the wording of criterion 2c of policy SG10 be modified to more accurately reflect paragraph 73 of Scottish Planning Policy.

3. I agree with Aldi Stores that the wording of criterion 2d of policy SG10 varies from bullet point four of paragraph 73 of Scottish Planning Policy through the inclusion of the wording ‘no unacceptable individual or cumulative impact’ and ‘neighbourhood centres’. The council refers to the third sentence of paragraph 70 of Scottish Planning Policy to justify the inclusion of neighbourhood centres. I consider that paragraph 70 primarily relates to the impact of a new development within an existing centre. This is different to the requirements of paragraph 73 of Scottish Planning Policy which relates to the consideration of development in out-of-centre locations and seeks to take account of the effect on the vitality and viability of existing town centres. Therefore, I do not find that the inclusion of the wording ‘neighbourhood centres’ is justified by paragraph 70 of Scottish Planning Policy. In addition, I find that the inclusion of the phrase ‘no unacceptable individual or cumulative impact’ within criterion 2d would not accurately reflect the requirements of paragraph 73 of Scottish Planning Policy. I agree with Aldi Stores that the proposed wording would potentially introduce a more onerous test than that stated by Scottish Planning Policy. Accordingly, I consider that the wording of criterion 2d of policy SG10 be modified to more accurately reflect paragraph 73 of Scottish Planning Policy.

Reporter’s recommendations:

Modify the proposed local development plan by:

1. Amending the wording of criterion 2c of policy SG10: Town and Neighbourhood Centres on page 115 to read as follows: “Demonstrate that the proposal will help to meet proven qualitative or quantitative deficiencies;”.
2. Amending the wording of criterion 2d of Policy SG10: Town and Neighbourhood Centres on page 115 to read as follows: “Demonstrate that there will be no significant adverse effect on the vitality and viability of existing town centres;”.

Issue 31	Sustainable Design	
Development plan reference:	Policy E1: Sustainable Design	Reporter: Malcolm Mahony
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>R O'Brien (177/1) Scottish Natural Heritage (178/13) Broom, Kirkhill and Mearnskirk 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 (496/4)</p>		
Provision of the development plan to which the issue relates:	Section 5: Promoting a Low Carbon Place	
Planning authority's summary of the representation(s):		
<p><u>Support</u></p> <p><u>Scottish Natural Heritage (178/13)</u></p> <ul style="list-style-type: none"> • Support the emphasis given to sustainable site selection, sustainable transport, green infrastructure and the redevelopment of vacant and derelict land. • Welcome the intention to prepare Supplementary Guidance on Low and Zero Carbon Delivery. <p><u>Broom, Kirkhill and Mearnskirk Community Council (255/22)</u></p> <ul style="list-style-type: none"> • Strongly endorses East Renfrewshire's aim that delivering a low carbon future is central to the Proposed Plan's Development Strategy. <p><u>Objections</u></p> <p><u>R. O'Brien (177/1)</u></p> <ul style="list-style-type: none"> • LDP2 lacks ambition for tackling climate the climate and biodiversity emergency and meeting net zero carbon by 2045. • Strong headline policy in sustainable design should be front and centre in the LDP2. • Policy E1 is not strong enough and will be ineffectual in reducing carbon emissions to the degree required. • Section 6 (energy) - building standards set too low. 		

Broom, Kirkhill and Mearnskirk Community Council (255/23)

- All new build within East Renfrewshire should be encouraged to incorporate solar panel generating facilities on roofs.

Alison Lee (278/2)

- 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 Power Renewables (496/4)

- LDP2 should be future proofed and fully considers challenges that local communities are likely to face in the future.
- Welcome that the Plan acknowledges the need to "move towards a low carbon place and economy". LDP2 should do more to establish a positive policy and decision making framework for new renewable energy developments across East Renfrewshire, in particular, energy storage, solar and onshore wind.

Scottish Government (486/4), Scottish Power Renewables (496/4)

- 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 (496/4)

- 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

Scottish Natural Heritage (178/13), 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 Mearnskirk 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's Supplementary Planning Guidance (SPG) on Energy Efficient Design (CD/15), 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 intends 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 (496/4)

- 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, 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:

Supporting representations

1. The support expressed in representations for policy E1: Sustainable Design is noted but requires no examination.

Objections

2. R O'Brien's representation criticises the proposed plan (page 123, paragraph 6) for merely encouraging developers to look at options for providing combined heat and power and district heating in new developments. I consider that the wording in this particular sentence should be amended to align with the expectations set out in the rest of paragraph 6 where there is an onus of developers to consider heat and power options. This and the

next paragraph provide a hook for supplementary guidance which can set out more detailed requirements.

3. In relation to R O'Brien's broader objections, the council explains that the plan's response to climate change and biodiversity issues is spread across several policies, which include strategic policy 1: Development Strategy, policy D7: Natural Environment Features and policy D8: Sustainable Transport Networks as well as policy E1. The council's approach also extends beyond planning, including its corporate climate change strategy. I have not been referred to any assessment to support the claim that the policies proposed would fail to achieve sufficient reduction in carbon emissions. I therefore have no basis for recommending any amendment to the plan in that regard.

4. Using section 6 (Energy) of the Building Standards and the silver sustainability level as a minimum for new buildings is criticised as undemanding. The test used in local development plan examinations is whether the council's policies are sufficient and appropriate. In this case, I have no firm evidence that that standard is insufficient for the purposes of section 3F of the Town and Country Planning (Scotland) Act 1997 (as amended), as claimed, and therefore have no basis for recommending an amendment.

5. R O'Brien also criticises a lack of detail on monitoring and reporting of the energy and carbon footprint assessments required for major developments. However, this would normally be set out in the associated supplementary guidance which the council is to publish.

6. Broom, Kirkhill and Mearns Kirk Community Council wish to see encouragement for all new build development to incorporate solar panels on their roofs. The council considers this to be a matter for supplementary planning guidance rather than policy. I agree that such details are appropriate for guidance and that policy E1 contains a hook for such guidance under point 2.

7. Alison Lee is concerned about the selling off of natural greenspaces and suggests a carbon tax to prevent this. However, the proposed plan includes policies which seek to protect, enhance and increase the amount and quality of greenspaces. In particular, these are: Spatial Objective 1.4, Strategic Policy 1 (especially points 4 and 7) and policy D5: Protection of Urban Greenspace. I see no requirement to add to or amend these policies. Carbon taxation is outside the scope of this examination, which is confined to the proposed local development plan.

8. The Woodland Trust Scotland wishes to see the biodiversity and climate emergencies recognised as equally important and for them to be addressed together. It is not evident to me that there is inequality between treatment of the two issues in the proposed plan, and the council's approach of devoting separate chapters and policies to them does not seem to prevent co-ordination as the plan should be read and applied as a whole. The adaptation section on page 123 of the proposed plan, along with policy E1, do not confine the need for adaptation to our changing climate to the point where net zero emissions are achieved. Therefore, no amendments are required.

9. Homes for Scotland and Robertson Homes seek the removal of criterion 2 of the proposed policy to avoid duplication between planning control and building standards. There is, however, a requirement in section 3F of the Town and Country Planning (Scotland) Act 1997 (as amended) for local development plans to include policies to control greenhouse gas emissions from new buildings. As energy efficiency measurements are

currently carried out under the building regulations, it seems reasonable for the council to refer to these standards in its planning policy. Therefore, no amendment is required.

10. Scottish Power Renewables seeks future proofing of the proposed plan and a more positive policy for renewables. However, as I have been provided with no grounds for, or details of, such changes, I am unable to recommend any amendments.

11. The Scottish Government and Scottish Power Renewables both suggest that reference be made to the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, including its targets, and a correction to a date. The council agrees to this and I recommend a suitable amendment, in the interests of clarity and accuracy.

12. The Scottish Government seeks modification of policy E1 to fully take account of the requirements of section 3F of the Town and Country Planning (Scotland) Act 1997. The council agrees and has supplied similar text to that suggested by the Scottish Government. However, the council's text adds two categories, relating to technical constraints and impact on the historic environment, where other solutions would be considered. As those additions have not been justified, they are not included in my recommendation for textual amendment, which is required to comply with statutory requirements.

Reporter's recommendations:

Modify the proposed local development plan by:

1. Replacing the first paragraph of page 122 with the following:

“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.”.

2. Replacing the first sentence of the sixth paragraph on page 123 with the following:

“The Proposed Plan will expect developers to look at options for providing combined heat and power (CHP) and district heating in new developments.”.

3. Replacing criterion 2 of policy E1: Sustainable Design on page 124 with the following:

“2. Developments must incorporate sustainable and energy efficient design and construction methods and be built to meet a minimum of silver sustainability standard. All new buildings must 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-carbon and zero-carbon generating technologies. A statement will require 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:

- 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.”.

Issue 32	Renewable Energy	
Development plan reference:	Policy E2: Renewable Energy	Reporter: Alison Kirkwood
Body or person(s) submitting a representation raising the issue (including reference number):		
<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>		
Provision of the development plan to which the issue relates:	Section 5: Promoting a Low Carbon Place Pages 125 to 127	
Planning authority's summary of the representation(s):		
<p><u>Support</u></p> <p><u>Tarmac (491/2)</u></p> <ul style="list-style-type: none"> Strongly support identification of our client's land at Bannerbank Quarry as having strategic capacity for renewable energy development, shown as Appendix A of the submission. 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. <p><u>Objections</u></p> <p><u>Veronica Byrne (147/1)</u></p> <ul style="list-style-type: none"> Objection to wind turbines in vicinity of dwelling Objection on grounds wind turbines would be close to Glasgow airport radar. <p><u>Scottish Natural Heritage (178/11)</u></p> <ul style="list-style-type: none"> Generally, the content of this policy is supported. Consider that the criterion wording could be clarified. For example, wording should make it clear that development should have no landscape or visual impacts, including effects on wild land, and there should be no adverse effects on natural heritage, including birds. 		

- Whilst *Figure 15* 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 *Figure 15* appears to make no distinction. It would be helpful to clarify how the proposed areas in the Spatial Framework for 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 amending the wording of the criterion in *Policy E2: Renewable Energy* to provide clarification. Insert the following text:
"All proposals for low carbon and the Low and Zero Carbon Delivery Supplementary Guidance. They will also be required to demonstrate that there would be no significant adverse impact, either individually or cumulatively, on the following..."
- 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 2nd Para. change "Where appropriate, applications will be required to submit demonstrate satisfactory mitigation measures to alleviate any unacceptable

adverse effects".

- In Policy E2 2nd Para. change "negative" to "unacceptable" and "impacts" to "effects".
- In Policy E2 3rd 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 Scottish Planning Policy (SPP) (CD/68) 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 1st sentence should be amended to read (revised text italics):
Proposals for solar energy, wind ~~farm developments~~ energy, hydroelectric

Scottish Natural Heritage (178/11)

- The Council is of the opinion that the requirement for proposals to consider cumulative impacts are adequately covered by the Para 2 of Policy E2.
- It is not proposed to modify the Plan based upon the above.
- 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) (CD/44), 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 3rd 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 4th criterion of Policy E2 whereby the cumulative visual impacts can be assessed (see comments specifically on this 4th criterion below).
- SPR suggest that the Council should clarify the role that the Wind Energy Study (2012), the Clydeplan Landscape Capacity Study (2014) (as documented within Clydeplan Background Report 10 - Low and Zero Carbon Generating Technologies (CD/67)) 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. The approach in the Proposed Plan has been informed by the 2012 and 2014 local and regional studies. 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 1st 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 3rd 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 1st 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:

1. Tarmac’s support for the policy designation relating to Bannerbank Quarry and the comments from Broom, Kirkhill and Mearns Kirk Community Council that wind farms are not necessarily the best or only means of generating green energy are noted. These do not require any modifications to the plan.

The Need to Adapt to a Changing Climate (page 123)

2. Scottish Power Renewables seek to change the term “negative impacts” to “unacceptable effects” in the second paragraph on page 123 of the proposed plan. This suggested change relates to the supporting text and not the wording of policy E2 (renewable energy), as listed in the ‘modifications sought by those submitting representations’ section of this form.

3. Paragraph 169 in Scottish Government publication ‘Scottish Planning Policy’ and policy E2 in the proposed plan provide criteria against which energy proposals should be assessed. This would require the decision maker to consider a range of factors, including contribution to renewable energy generation targets and impacts on communities and environmental designations.

4. Given the nature and scale of wind energy developments in particular, it would likely be unrealistic to suggest that all negative impacts on the environment could be avoided or mitigated. This is reflected in paragraph 170 of Scottish Planning Policy, which states that “wind farms should be sited and designed to ensure impacts are minimised and to protect an acceptable level of amenity for adjacent communities”. Furthermore, the second

paragraph of policy E2 in the proposed plan refers to “unacceptable significant adverse effects”. Within this context, I consider that the use of the term “unacceptable effects” in the second paragraph on page 123 would more accurately reflect the aims of the plan, in relation to delivering a low carbon future. A slight modification is therefore recommended.

Spatial Framework for Wind Energy Development (pages 125 and 126)

5. The legend proposed by the council would provide the necessary clarification regarding the “group 2” and “group 3” areas shown on the spatial framework for wind energy development (Figure 15). Consequently, a modification to Figure 15 is recommended.

6. I note that diagram 6 in Clydeplan (the Strategic Development Plan for Glasgow and the Clyde Valley, approved in July 2017) provides an onshore wind spatial framework for the Glasgow city region and policy 10 requires local development plans to finalise the detailed spatial formwork for onshore wind in their areas. In response to a further information request, the council has confirmed that the spatial framework contained in the proposed plan was informed by Clydeplan and its supporting documents, including the Glasgow and Clyde Valley Landscape Capacity Study 2014 and Background Report 10.

7. I consider that the last sentence of the third paragraph on page 125 should be amended to indicate that the spatial framework has been prepared within the context of Clydeplan policy 10 (as well as making reference to the Council’s Wind Energy Study 2012) and that further information on relevant background studies will be provided in the supplementary guidance on low and zero carbon delivery.

8. Scottish Government Planning Circular 6/2013: development planning (paragraph 139) provides a list of suitable topics for inclusion in supplementary guidance, provided there is an appropriate context in the plan. This includes detailed policies where the principles are already established. I consider that the clarification sought by Scottish Power Renewables, in relation to previous and future studies and the weight to be given to these, would be more appropriately addressed through the supplementary guidance on low and zero carbon delivery.

9. The additional text suggested by the council, which explains that the group 3 areas shown on Figure 15 exclude land within two kilometres of the main settlements, sites of special scientific interest and peatland areas, is appropriate.

10. Scottish Power Renewables is also concerned that reference to remaining capacity in the fourth paragraph on page 125 is a negative statement. I consider the wording used in this paragraph is in line with paragraph 169 of Scottish Planning Policy, which recognises that the cumulative impact of existing and consented energy development may limit the capacity for further developments in some areas. Policy 10 in Clydeplan also requires local development plans to take account of landscape capacity.

11. Modifications to the third paragraph on page 125 are recommended to provide further explanation in relation to the spatial framework for wind farm development. A slight modification to the last sentence in the fourth paragraph is also recommended to clarify that the area mentioned is the whole council area and to refer to ‘onshore wind energy development’ not ‘onshore wind’.

Policy E2 (page 127)

12. The matters raised by Ms Byrne are valid planning considerations. However, it is not the role of the local development plan to determine the acceptability or otherwise of future wind energy proposals in the vicinity of individual properties. I agree with the council that potential impacts on dwellinghouses are covered by criterion 5 in policy E2 and potential impacts on airport radar systems are covered by criterion 12. The approach taken to the protection of individual properties is in accordance with paragraph 164 in Scottish Planning Policy. No modification is required to the proposed plan to address this matter.

13. I note that Scottish Natural Heritage (now NatureScot) is generally supportive of the wording of policy E2 but seeks clarification on the criteria wording. It suggests that the policy should make it clear that development should have no landscape or visual impacts. However, given the size and nature of wind energy developments, I consider that it would be unrealistic to expect proposals to have no landscape or visual impacts.

14. The alternative wording suggested by NatureScot would not make sense in the context of the wording of the proposed policy, as it would require proposals to demonstrate that there would be no significant adverse impacts on a list of impacts or effects. The requirement for proposals to demonstrate that they do not result in “unacceptable significant adverse effects”, taking account of a range of considerations, including cumulative impact, is already included in the second paragraph of policy E2. The criteria listed in the third paragraph of policy E2 are consistent with those set out in paragraph 169 of Scottish Planning Policy and include landscape and visual impacts, including effects on wild land and effects on natural heritage, including birds. These are to be considered in determining the acceptability of a proposal. No modification is required to the proposed plan to address this matter.

15. I agree that replacing the words “low carbon and renewable energy” with “low and zero carbon renewable energy” in the first and third paragraphs of policy E2 would provide a more accurate description of the proposals to which this policy would apply, within the context of the Scottish Government’s climate change targets and commitments. I also agree that the suggested change to the second paragraph of policy E2 to replace the word “submit”, with “demonstrate” in relation to mitigation measures would be appropriate. Slight modifications are therefore recommended.

16. Criterion 4 in policy E2 indicates that the cumulative impact of existing and consented energy development may limit the capacity for future development. Scottish Power Renewables seeks to caveat this statement and include reference to national renewable energy targets. I consider that the suggested additional text would be superfluous, as all proposals require to be considered on their individual merits. The need to take account of renewable energy generation targets is already covered in criterion 2 of policy E2. No modification is required to the proposed plan in relation to this matter.

17. The wording of criterion 16 in policy E2 is consistent with Scottish Planning Policy paragraph 169. I agree with the council that it is sufficiently clear and there is no justification to change it.

18. Paragraph 169 in Scottish Planning Policy identifies opportunities for energy storage as a potential relevant consideration, when assessing proposals for energy infrastructure developments. Within this context and given that the council accepts that energy storage can make a contribution to renewable energy proposals, I consider that “opportunities for

energy storage” should be added to the list of criteria in policy E2. A slight modification is therefore recommended.

19. I note that proposals for extensions and repowering of existing wind farms would also be assessed in terms of the policy E2. I consider that the detailed comments made by Scottish Power Renewables in relation to the evolving nature of the renewables industry and future proposals for repowering and life extension of existing sites would be more appropriately addressed through the preparation of supplementary guidance. No modification is required to the wording of policy E2 to address these matters.

20. I further note that the council seeks to correct the typo in criterion 12 of policy E2. This is a minor change which the council is entitled to make itself following the examination. The council has also suggested amending the first sentence in the second paragraph of policy E2 to refer to “wind energy” instead of “wind farm developments”. As there is no unresolved representation seeking such a change I have no remit to include this amendment. However, the council may consider this also to be a minor modification which it can rectify.

Heat networks and combined heat and power systems

21. Persimmon Homes are concerned that retrofitting connections to an adjacent heat network would not be feasible or financially viable for housing developments, where there will be a range of owners.

22. The fourth paragraph of policy E2 states that developments should be designed to allow future connections to an adjacent or proposed heat networks, where an immediate connection is not possible. I consider that this approach, which provides general encouragement rather than a mandatory requirement, is in accordance with Scottish Planning Policy (paragraphs 158-160) and Clydeplan policy 10. In further support of this position, I note that paragraph 160 of Scottish Planning Policy recognises that there are circumstances where heat networks are not viable, while policy 10 in Clydeplan includes caveats such as “where appropriate” and “identify opportunities”.

23. The supplementary guidance on low and zero carbon delivery provides the opportunity for the council to set out further information in relation to the implementation of policy E2, including where exceptions would be justified. No modification is required to the proposed plan to address this matter.

Reporter’s recommendations:

Modify the proposed local development plan by:

1. Replacing the words “negative impacts” from the second sentence of the second paragraph on page 123 with “unacceptable effects” to read:

“The overall aim is to ensure any unacceptable effects upon the environment are avoided or mitigated.”.

2. Replacing the last sentence of the third paragraph on page 125 with the following three sentences:

“The spatial framework was prepared within the context of policy 10 in Clydeplan 2017 and

informed by the Council's Wind Energy Study 2012. The 'Group 3' boundaries exclude land within two kilometres 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. Further information on relevant background studies will be provided in the Supplementary Guidance on Low and Zero Carbon Delivery."

3. Replacing the last sentence of the fourth paragraph on page 125 with: "This has resulted in a significant reduction in the remaining capacity for onshore wind energy development in East Renfrewshire."

4. Adding the following legend to Figure 15 (spatial framework for wind energy development) on page 126:

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.

5. Replacing the words "low carbon and renewable energy proposals" in the first and third paragraph of policy E2 on page 127 with "low and zero carbon renewable energy proposals".

6. Replacing the word "submit" in the last sentence in the second paragraph of policy E2 with "demonstrate" to read:

"Where appropriate, applications will be required to demonstrate satisfactory mitigation measures to alleviate any unacceptable adverse effects."

7. Adding an additional bullet point to the end of the existing list of 16 criteria in policy E2 on page 127 as follows:

"17. Opportunities for energy storage."

Issue 33	Soil and Noise	
Development plan reference:	Policy E4: Soil Policy E5:Noise	Reporter: Alison Kirkwood
Body or person(s) submitting a representation raising the issue (including reference number):		
Scottish Natural Heritage (178/12) James Bennett (234/3)		
Provision of the development plan to which the issue relates:	Chapter 5: Promoting a Low Carbon Place	
Planning authority's summary of the representation(s):		
<p><u>(a) Policy E4: Soil</u></p> <p><u>Objections</u></p> <p><u>Scottish Natural Heritage (178/12)</u></p> <ul style="list-style-type: none"> • Generally, support this policy. • However, the need to “minimise adverse impacts on soils, including the unnecessary disturbance of peat or other carbon rich soils” could be strengthened to ensure adverse impacts on soils are avoided. <p><u>(b) Policy E5:Noise</u></p> <p><u>Objections</u></p> <p><u>James Bennett (234/3)</u></p> <ul style="list-style-type: none"> • 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. 		
Modifications sought by those submitting representations:		
<p><u>(a) Policy E4: Soil</u></p> <p><u>Scottish Natural Heritage (178/12)</u></p> <ul style="list-style-type: none"> • Recommend amending the following wording: “Proposals will be required to minimise adverse impact on soil, avoiding the unnecessary disturbance of peat and other carbon rich soils...” 		

(b) Policy E5:Noise

James Bennett (234/3)

- 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.

Summary of responses (including reasons) by planning authority:

(a) Policy E4: Soil

Objections

Scottish Natural Heritage (178/12)

- The Council agrees with the suggested wording. 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.
- Policy E4 1st Para should be amended to read (revised text in italics):
Proposals will be required to minimise adverse impact on soil, including avoiding the unnecessary disturbance of peat and other carbon rich soils...

(b) Policy E5:Noise

Objections

James Bennett (234/3)

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

Reporter’s conclusions:

Policy E4: Protecting Soil Quality

1. I agree with Scottish Natural Heritage (now NatureScot) that replacing the word

'including' with 'avoiding' and the word 'or' with 'and' would be appropriate to protect peat and other carbon rich soils, in line with paragraphs 204 and 205 in Scottish Planning Policy. A slight modification is therefore recommended.

Policy E5: Noise Impacts

2. I note that the reason behind the requested change relates to construction noise arising from a major housing development. The aim of policy E5 (noise impacts) is to manage the impact of uses which, in operational terms, have the potential to generate noise levels which would have a detrimental impact. I consider that the policy wording provides an appropriate basis for the assessment of noise generating uses, including where these would be located next to noise sensitive uses.

3. It would not be reasonable to amend the policy wording to address a site specific complaint. I agree with the council's advice on the ways in which noise complaints can be addressed. No modification is required to the proposed plan to address this matter.

Reporter's recommendations:

Modify the proposed local development plan by:

1. Replacing the first sentence of policy E4 (protecting soil quality) on page 128 with the following: "Proposals will be required to minimise adverse impacts on soil, avoiding the unnecessary disturbance of peat and other carbon rich soils, and minimise the amount of land that is affected."

Issue 34	Water Environment and Flooding	
Development plan reference:	Policy E7: Flooding Policy E8: Water Management Policy E9: Waste Water Treatment	Reporter: Alison Kirkwood
Body or person(s) submitting a representation raising the issue (including reference number):		
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)		
Provision of the development plan to which the issue relates:	Chapter 5: Promoting a Low Carbon Place	
Planning authority's summary of the representation(s):		
<p><u>(a) Policy E7: Flooding</u></p> <p><u>Support</u></p> <p><u>SEPA (492/6)</u></p> <ul style="list-style-type: none"> • 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. • Support the requirement of a Flood Risk Assessment to identify appropriate land for development and to inform the use and design of projects. • Support the recognition that land raising should only be accepted in exceptional circumstances. • Welcome the reference to safeguarding the storage capacity of the functional floodplain. <p><u>Objections</u></p> <p><u>James Bennett (234/5)</u></p> <ul style="list-style-type: none"> • 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 www.hse.gov.uk/offshore/ed-sce-management-and-verification.pdf <p><u>Broom, Kirkhill and Mearnskirk Community Council (255/26)</u></p> <ul style="list-style-type: none"> • Requests that future determination of Planning Applications take flooding matters into 		

more detailed consideration than have been demonstrated in the past.

Newton Mearns Flood Group (480/1)

- Policy should be strengthened

(b) Policy E8: Water Management

Objections

Newton Mearns Flood Group (480/4)

- Policy should be strengthened

(c) Policy E9: Waste Water Treatment

Support

Broom, Kirkhill and Mearns Kirk 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

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/68)

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

Objections

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:

Policy E7: Flooding

1. I note that Broom, Kirkhill and Mearnskirk Community Council supports the wording of proposed policy E7 (flooding). Its comments in relation to the use of the policy in the determination of planning applications do not require any changes to the wording.
2. The strengthening of policy E7, requested by Newton Mearns Flood Group, relates to the requirement for flood risk assessments. I find that the approach to flood risk assessments in policy E7 aligns with the flood risk framework prescribed in paragraph 266 of Scottish Planning Policy and is supported by the Scottish Environment Protection Agency. Therefore, no modification is required to strengthen the wording of policy E7.

Policy E8: Water management

3. While the council has summarised Mr Bennett's points under policy E7, I find that they relate to proposed policy E8 (water management) and the supporting text on page 150. The strengthening of policy E8, requested by Newton Mearns Flood Group, relates to a requirement for technical information on water storage and runoff management.
4. Proposed policy E8 requires proposals to meet the requirements of the current edition of Sewers for Scotland, which provides the technical specification for the design and construction of sewerage infrastructure in Scotland. The most up-to-date version was published by Scottish Water in 2018. I consider the reference to this publication (in policy E8 and the supporting text) to be a reasonable and proportionate approach to addressing the technical specifications relating to sewerage infrastructure.
5. It is not the role of the local development plan to set verification and performance standards for environmental critical elements and equipment, as requested by Mr Bennett. It would also not be appropriate to refer to technical requirements set out in Environment Agency guidance (which applies to England and Wales), as suggested by Newton Mearns Flood Group. No modification to policy E8 or the supporting text is therefore required to address the points raised in representations.

Policy E9: Waste water treatment

6. Broom, Kirkhill and Mearnskirk Community Council's support for policy E9 (waste water treatment) and its comments in relation to the use of the policy are noted but require no examination.
7. The strengthening of policy E9, requested by Newton Mearns Flood Group, relates to a requirement for the submission of a development impact assessment. I understand that a development impact assessment is a document submitted to Scottish Water, in support of an application for new connections to the public water and waste network.
8. Scottish Water is a statutory consultee within planning legislation and is required to

comment on planning applications which are referred by a planning authority. Whilst this does not guarantee that there would be sufficient network capacity available for a development, it allows Scottish Water to make the planning authority aware of any known constraints. Applying for planning permission and submitting a development impact assessment are two separate processes and the time frame for applications for new water connections may be a number of years after planning permission is granted. Consequently, I find that it would not be reasonable or practical to make this a requirement of policy E9.

Reporter's recommendations:

No modifications.

Issue 35	Vacant, Derelict and Contaminated Land	
Development plan reference:	Policy E10: Vacant, Derelict and Contaminated Land	Reporter: Alison Kirkwood
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Scottish Natural Heritage (178/12) Woodland Trust Scotland (376/8) The Coal Authority (473/1)</p>		
Provision of the development plan to which the issue relates:	Chapter 5: Promoting a Low Carbon Place	
Planning authority's summary of the representation(s):		
<p><u>Support</u></p> <p><u>Scottish Natural Heritage (178/12)</u></p> <ul style="list-style-type: none"> Strongly support policy. In particular, the recognition of protected species and the biodiversity value of brownfield sites, and the emphasis given to temporary greening. <p><u>Woodland Trust Scotland (376/8)</u></p> <ul style="list-style-type: none"> 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. <p><u>Objection</u></p> <p><u>The Coal Authority (473/1)</u></p> <ul style="list-style-type: none"> Pleased to see the inclusion of the consideration of land instability. Recommend that this requirement is made more explicit in the wording of the policy. 		
Modifications sought by those submitting representations:		
<p><u>The Coal Authority (473/1)</u></p> <ul style="list-style-type: none"> 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. 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..... 		

Summary of responses (including reasons) by planning authority:

Support

Scottish Natural Heritage (178/12), Woodland Trust Scotland (376/8)

- 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:

1. The support within representations for proposed policy E10 (vacant, derelict and contaminated land), in particular the reference to biodiversity interests and temporary greening, is noted but requires no examination.

2. The matters raised in the Coal Authority's representations to proposed policies E10 and E12 (minerals) are closely related. Therefore, while matters raised by the representee are also summarised in Issue 36 (minerals), I deal with them in my conclusions below.

3. Proposed policy E12 seeks to safeguard mineral resources and sets the criteria for assessing proposals for mineral extraction. Apart from making the link to past mining activity, I do not consider there is any reason for the first paragraph on land stability to be included in the policy. I agree with the Coal Authority that it may result in confusion of users of the plan, who would not necessarily expect matters relating to unstable land to be found in the minerals policy.

4. I find that land instability, including as a result of past mining activity, is more closely related to the matters covered in policy E10 (vacant, derelict and contaminated land). Indeed, the second paragraph of this policy already makes reference to ground instability. Whilst the Coal Authority has suggested two potential ways that policy E12 could be amended to address its concerns, I find that a modification to policy E10 would be preferable. This would allow matters relating to potential public safety risks and the need for remediation of land or buildings to be covered in one policy.

5. The council has referred to other sections of the proposed plan which it considers address ground instability issues. Whilst I note that strategic policy 1 (development strategy) supports regeneration, consolidation and environmental enhancement, I can find no reference to land instability in this policy or policy D1 (placemaking and design). The council acknowledges the role of the Coal Authority as a statutory consultee in areas where there has been past coal mining (which includes East Renfrewshire) and the need for site investigations to be undertaken.

6. Within this context, I consider that the wording of policy E10 should include reference to the submission of ground conditions reports and coal mining risk assessments, to make developers aware that these may be required in support of their application.

7. It is also recommended that an additional paragraph is included in the supporting text for policy E10. Based on information provided in the Coal Authority's representation, this would explain the reason for the policy requirements in relation to unstable land and highlight the benefits that development can bring (similar to the existing wording in relation to vacant, derelict and contaminated land).

8. A slight modification to the heading of policy E10 and its supporting text, to include the word 'unstable' and an additional sentence in the supporting text for policy E12, to provide a cross reference to policy E10, are recommended in the interests of clarity.

Reporter's recommendations:

Modify the proposed local development plan by:

1. Deleting the first paragraph from Policy E12: Minerals on page 137.
2. Adding the following sentence to the end of the supporting text on page 137 (after "the criteria listed in policy E12"): "The requirement to take account of and mitigate the effects of past mining activity is set out in policy E10."
3. Adding the word "unstable" to the title of Policy E10 on page 134 to read as follows: "Policy E10: Vacant, Derelict, Contaminated and Unstable Land".
4. Adding the word "unstable" to the first paragraph of Policy E10 on page 134 to read as follows: "Proposals will be required to optimise the remediation and redevelopment of

vacant, derelict, contaminated and unstable land and buildings, where appropriate.”.

5. Adding the following sentence to the second paragraph of Policy E10 on page 134 to form a new second sentence (after “their application”): “Where instability of a development site is identified, including as a result of past mining activity, applicants will be required to submit a ground conditions report or coal mining risk assessment alongside their application.”.

6. Adding the word “unstable” to the title of the supporting text on page 134 to read “Vacant, Derelict, Contaminated and Unstable Land”.

7. Adding the following text in a new paragraph to the supporting text on page 134 (after “through Policy D4”): “Past coal mining activity can leave a legacy of unstable land, which poses a public safety risk. However, through the submission of supporting technical information and the identification of appropriate mitigation measures and remediation strategies, development provides the opportunity to address mining legacy matters and make unstable land safe for future generations.”.

Issue 36	Minerals	
Development plan reference:	Policy E12: Minerals	Reporter: Alasdair Edwards
Body or person(s) submitting a representation raising the issue (including reference number):		
The Coal Authority (473/2) Scottish Government (486/6)		
Provision of the development plan to which the issue relates:	Chapter 5: Promoting a Low Carbon Place	
Planning authority's summary of the representation(s):		
<p><u>Objections</u></p> <p><u>The Coal Authority (473/2)</u></p> <ul style="list-style-type: none"> • Pleased to see the policy sets out criteria against which proposal for mineral development can be assessed. • 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. • 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. <p><u>Scottish Government (486/6)</u></p> <ul style="list-style-type: none"> • 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. 		
Modifications sought by those submitting representations:		
<p><u>The Coal Authority (473/2)</u></p> <ul style="list-style-type: none"> • Option 1 – Split into two policies <ul style="list-style-type: none"> ○ Delete Para 1 from Policy E12. ○ 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 3rd 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:

Objections

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/80) 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/05) 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/68) (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:

1. The unresolved issues raised by the Coal Authority are addressed in Issue 35 (vacant, derelict and contaminated land) above.
2. Scottish Government publication ‘Scottish Planning Policy’ states, at paragraph 238, that “plans should support the maintenance of a landbank or permitted reserves for construction aggregates of at least 10 years at all times in all market areas through the identification of areas of search”. In addition, the paragraph notes that “as an alternative, a criteria-based approach may be taken, particularly where a sufficient landbank already exists or substantial unconstrained deposits are available”.
3. As explained by the council, Clydeplan (the strategic development plan for Glasgow and the Clyde Valley, 2017) identifies a single area of search covering the strategic geographical area (the market area); and the proposed East Renfrewshire Local Development 2 notes that no specific search areas are identified within East Renfrewshire. Paragraph 8.17 of Clydeplan identifies that there is sufficient hard rock operational reserves to meet demand but that consented sand and gravels supplies are forecast to be constrained beyond 2021.

4. Clydeplan policy 15 (natural resource planning – mineral resources spatial framework) requires the maintenance of “an adequate and steady supply of minerals” with a landbank of at least 10 years. Supplementary guidance on this matter is to be published. A series of criteria are also given in the policy requiring mineral extraction proposals to be assessed against the Clydeplan vision and spatial development strategy as well as provisions in local development plans. Further criteria include considering economic benefits against potential harmful environmental and community impacts.

5. In support of Clydeplan, the proposed East Renfrewshire Local Development Plan 2 includes a criteria-based approach to the release of land for mineral extraction through policy 12 (minerals).

6. I find that the development plan provisions contained within Clydeplan and the proposed East Renfrewshire Local Development Plan 2 sufficiently align with Scottish Planning Policy in allowing the consideration of minerals proposals to promote the maintenance of a 10 year landbank of construction aggregates. While there might be a forecast constraint in aggregate reserves across the market area (the Glasgow conurbation) East Renfrewshire is not identified within an area of search which could necessarily contribute. In any case, the criteria-based approach would allow for proposals to be assessed if required. In conclusion, no change to the proposed plan is required to address this matter.

Reporter’s recommendations:

No modifications.